



CIRO · OCRI

Canadian Investment
Regulatory
Organization

Organisme canadien
de réglementation
des investissements

Dual-Registration Questionnaire for Existing Members

Version Date: June 1, 2023

GENERAL INSTRUCTIONS

- This Dual-Registration Questionnaire is intended for existing Members of Canadian Investment Regulatory Organization (CIRO) who wish to become registered as both an investment dealer and a mutual fund dealer (i.e., a dual-registered).
- This Dual-Registration Questionnaire is not intended for firms that are applying for new membership with CIRO. Firms seeking new membership must complete and submit the Membership Application and supporting documents.
- Please complete this Dual-Registration Questionnaire in full. Enter requested details in the space provided. If there is insufficient space, provide the requested details in a separate attachment and label it with the relevant question number (e.g., Attachment B1).
- Refer to the Documentation Checklist at the end of this Questionnaire for a list of supporting documents that Members must submit along with the completed Dual-Registration Questionnaire.
- Incomplete responses or incomplete documentation will delay the review and processing of the Member's dual-registration request.
- Members are encouraged to contact CIRO staff at memberintake@ciro.ca to discuss the details of their application to become dual-registered before submitting their application package. This will facilitate an efficient application and review process.

Dual-Registered Questionnaire

Complete the questions for the applicable type of Dealer Member described below:

- **A/A** = A single legal entity is being formed through acquisition or amalgamation of an existing Investment Dealer(s) and Mutual Fund Dealer(s).
- **ID** = An existing Investment Dealer is adding Mutual Fund Dealer registration.
- **MFD** = An existing Mutual Fund Dealer is adding Investment Dealer registration.

Complete the Questions for the applicable Type of Dealer Member (DM)	Type of DM		
	A/A	ID	MFD
A. GENERAL INFORMATION			
A1. Type of Applicant Which best describes the firm that is seeking dual registration? A1.1. Single legal entity is being formed through acquisition or amalgamation of existing Investment Dealer(s) and Mutual Fund Dealer(s) <input type="checkbox"/> Yes <input type="checkbox"/> No A1.2. Existing Investment Dealer is adding Mutual Fund Dealer registration <input type="checkbox"/> Yes <input type="checkbox"/> No A1.3. Existing Mutual Fund Dealer is adding Investment Dealer registration <input type="checkbox"/> Yes <input type="checkbox"/> No	A/A	ID	MFD
A2. Investment Dealer Member Provide the legal name and NRD number for the existing Investment Dealer(s). <div style="border: 1px solid black; height: 20px; width: 100%; margin-top: 5px;"></div>	A/A		
A3. Mutual Fund Dealer Member Provide the legal name and NRD number for the existing Mutual Fund Dealer(s). <div style="border: 1px solid black; height: 20px; width: 100%; margin-top: 5px;"></div>	A/A		
A4. Member Firm seeking Dual Registration Provide the legal name and NRD number for the Member that is seeking dual registration. <div style="border: 1px solid black; height: 20px; width: 100%; margin-top: 5px;"></div> A4.1. Change in Legal Name Is the Member changing its legal name? <input type="checkbox"/> Yes <input type="checkbox"/> No <i>If 'Yes,' provide a copy of the Articles of Amendment evidencing the change in legal name.</i>		ID	MFD
A5. Requested Timing When is the Member requesting to begin operating as a dual-registered dealer? <div style="border: 1px solid black; height: 20px; width: 100%; margin-top: 5px;"></div>	A/A	ID	MFD
B. ACQUISITION OR AMALGAMATION			
B1. Details of Proposed Reorganization, Acquisition or Amalgamation Provide written notice and details of the proposed reorganization, acquisition or amalgamation, as required under the Corporation By-Law No. 1, Section 3.10.	A/A		
B2. Legal Name of Continuing Firm Is the continuing Member firm changing its legal name? <input type="checkbox"/> Yes <input type="checkbox"/> No <i>If 'Yes,' provide the Member's new legal name and a copy of the Articles of Amendment evidencing the change in legal name.</i> <div style="border: 1px solid black; height: 40px; width: 100%; margin-top: 5px;"></div>	A/A		

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<p>B3. Continuing Member Undertaking and Financial Statements</p> <p>For an amalgamation, the continuing Member must provide the following documentation in accordance with Section 2224 of the Investment Dealer and Partially Consolidated Rules:</p> <p>B3.1. An undertaking that it accepts responsibility for all liabilities of the Members that are amalgamating.</p> <p>B3.2. Pro forma financial statements of the continuing Member showing compliance with CIRO requirements relating to capital requirements for Investment Dealers.</p>	A/A		
<p>B4. Resignation of Existing Member(s)</p> <p>Provide the required letter of resignation and supporting documents for the Member(s) that is resigning its CIRO membership:</p> <ul style="list-style-type: none"> ▪ For resigning Investment Dealer(s), refer to Sections 2221, 2222, 2223, 2226 and 2227 of the Investment Dealer and Partially Consolidated Rules. ▪ For resigning Mutual Fund Dealer(s), refer to Section 8.3 of the Mutual Fund Dealer Rules. <p><i>Note: Firms should consult with the securities regulator in their principal jurisdiction on whether they need to apply to the securities regulator to surrender their registration.</i></p>	A/A		
C. INTEGRATION PLAN			
<p>C1. Organization of Investment Dealer and Mutual Fund Dealer business</p> <p>Provide a detailed description of how the Member plans to organize its operations as a dual-registered dealer. Include whether the Member will take:</p> <p>a) a "full integration" approach where its mutual fund business will be incorporated into existing Investment Dealer operations and the Member will follow the Investment Dealer and Partially Consolidated Rules (except where there is a Mutual Fund Dealer Rule and there is no corresponding requirement in the Investment Dealer and Partially Consolidated Rules); or</p> <p>b) a "divisional" approach where the Member will operate its Investment Dealer business and its Mutual Fund Dealer business as separate divisions within the single legal entity.</p> <p>Consider the following areas of the Member's business and operations:</p> <ul style="list-style-type: none"> ▪ The Member's corporate governance document that sets out the organizational structure and reporting relationships (i.e., the Member's chain of senior management, supervisory accountability and responsibilities). ▪ Client account opening processes and documents ▪ Advisor KYC, KYP and Suitability requirements ▪ Business activities (e.g., products and services offered) ▪ The Member's system(s) of books and records ▪ Client reporting (e.g., account statements, trade confirmations, annual performance reports) ▪ Regulatory reporting and/or financial reporting ▪ Back-office operations (e.g., trade execution, trade clearing and settlement, trade related cash and security custody, position reconciliations) ▪ The Member's supervisory framework (e.g., supervisory systems & processes, supervisory structure, supervisory personnel) 	A/A	ID	MFD
<p>C2. Mutual Fund-only Advisors and Supervisory Personnel</p> <p>For Members planning on a "divisional" approach, describe how the firm will clearly identify or delineate its Mutual Fund-only advisors and their related supervisory and compliance staff.</p> <div style="border: 1px solid black; height: 100px; width: 100%;"></div>	A/A	ID	MFD

Complete the Questions for the applicable Type of Dealer Member (DM)	Type of DM		
	A/A	ID	MFD
<p>C3. Mutual Fund Restricted RRs/IRs under the 270-Day Upgrade Period</p> <p>Does the Investment Dealer have any RRs/IRs restricted to mutual funds only who are currently within the 270-day period that they must complete the applicable education requirements, as described in Section 2553(4) of the Investment Dealer Rules and Partially Consolidated Rules?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><i>If 'Yes,' provide the names of the impacted RRs/IRs and whether they plan to complete the education and training requirements to remove the mutual funds only restriction before the Member becomes dual-registered.</i></p> <div style="border: 1px solid black; height: 80px; width: 100%;"></div>	A/A	ID	
<p>C4. Controls to Ensure no Activities Outside the Approved Category of Registration</p> <p>Describe the Member's controls to ensure that Mutual-Funds-only Dealing Representatives do not conduct activities outside their approved category of registration.</p> <div style="border: 1px solid black; height: 80px; width: 100%;"></div>	A/A	ID	MFD
<p>C5. Client Accounts in Separate Investment Dealer and Mutual Fund Dealer Divisions</p> <p>Describe how the firm will address its obligations to clients where they have accounts in the separate Investment Dealer and Mutual Fund Dealer divisions of the Member. Include, for example, how the Member will carry out its obligation to assess suitability with respect to concentration and liquidity of the client's portfolio of investments.</p> <div style="border: 1px solid black; height: 80px; width: 100%;"></div>	A/A	ID	MFD
<p>C6. Existing Regulatory Exemptions</p> <p>Does the Member have any existing regulatory exemptions that it plans to continue relying on once it becomes dual-registered?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <i>(If 'Yes,' please provide full details.)</i></p> <div style="border: 1px solid black; height: 80px; width: 100%;"></div>	A/A	ID	MFD
<p>C7. Exemptive Relief</p> <p>Does the Member plan to apply for exemptive relief from any requirements of the Investment Dealer Rules and Partially Consolidated Rules in connection with its request to become dual-registered?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <i>(If 'Yes,' proceed to C7.1.)</i></p>	A/A	ID	MFD

Complete the Questions for the applicable Type of Dealer Member (DM)	Type of DM		
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<p>C7.1. Application for Exemptive Relief - Business Case</p> <p>Please attach the Member's business case for seeking an exemption from the Investment Dealer and Partially Consolidated Rules ("Investment Dealer Rules"), which must include at a minimum the following information:</p> <ul style="list-style-type: none"> ▪ the specific Investment Dealer Rule(s) that the Member is requesting exemptive relief from ▪ the specific Mutual Fund Dealer Rule(s) that the Member is proposing to comply with in lieu of the applicable Investment Dealer Rule(s) ▪ the reason(s) the Member is applying for exemptive relief and how the exemption would ensure: (i) minimal disruption to existing operations of the Mutual Fund Dealer business; or (ii) efficient operation of the combined firm operations within a single legal entity ▪ the rationale supporting the application and any supporting documentation <p><i>Note: Refer to IIROC Guidance Note GN-1300-21-001 Exemption Applications Relating to IIROC Rules for information on how to make an exemption application. Exemption applications related to the Member's request to become dual-registered should be submitted with this Questionnaire. Members may refer to the CIRO's website for guidance on which Investment Dealer Rules CIRO will consider exemption applications for with respect to dual-registered firms. Exemption applications are subject to review by CIRO staff and require approval by the CIRO's Board of Directors.</i></p>	A/A	ID	MFD
<p>C8. Transfer of Client Accounts</p> <p>Describe in detail the Member's plans to transfer-in client accounts from another Member firm, including:</p> <ul style="list-style-type: none"> ▪ how the Member will meet the requirement to obtain and maintain applicable client account records in accordance with Section 3212(1) of the Investment Dealer and Partially Consolidated Rules; and ▪ whether the Member plans to apply for exemptive relief regarding bulk account movements, pursuant to Section 4866 of the Investment Dealer and Partially Consolidated Rules. <p><i>Note: Refer to IIROC Guidance Note GN-4800-21-003 Exemption Procedure for Bulk Account Movements for further information on how to submit an application for exemption for bulk account movements.</i></p> <div style="border: 1px solid black; height: 100px; width: 100%;"></div>	A/A	ID	MFD
<p>C9. Client Account Opening Documents</p> <p>Is the Member changing any of its existing client account opening documents or introducing any new client account opening documents for its Investment Dealer business or its Mutual Fund Dealer business? This includes the Member's New Account Application Forms ("NAAFs"), KYC forms, Client Account Agreements, and liability waivers.</p> <p><input type="checkbox"/> Yes (If 'Yes,' proceed to C9.1.)</p> <p><input type="checkbox"/> No (If 'No,' please explain why the Member is not changing its existing client account documents or developing new client account opening documents, then proceed to C10.)</p> <div style="border: 1px solid black; height: 80px; width: 100%;"></div> <p>C9.1. Client Account Opening Documents – Samples</p> <p>Please provide samples of each new or revised client account opening document and identify whether it will be used for the Member's Investment Dealer business, Mutual Fund Dealer business, or both.</p>	A/A	ID	MFD

Complete the Questions for the applicable Type of Dealer Member (DM)	Type of DM		
	A/A	ID	MFD
<p>C10. Client Disclosures</p> <p>Is the Member changing any of its existing client disclosures or introducing any new client disclosures for its Investment Dealer business or its Mutual Fund Dealer business? Examples include the following:</p> <ul style="list-style-type: none"> ▪ relationship disclosure information ▪ conflict of interest disclosures ▪ leverage risk disclosure ▪ disclosure of best execution policies ▪ dual occupation disclosure for dually employed Approved Persons ▪ disclosure to clients with respect to any Introducing/Carrying Broker or Dealer relationship <p><input type="checkbox"/> Yes (If 'Yes,' proceed to C10.1.)</p> <p><input type="checkbox"/> No (If 'No,' please explain why the Member is not changing its existing client disclosures or developing new client disclosures, then proceed to C11.)</p> <div style="border: 1px solid black; height: 60px; margin-top: 10px;"></div> <p>C10.1. Client Disclosures – Samples</p> <p>Please provide samples of each new or revised client disclosure and identify whether it will be used for the Member's Investment Dealer business, Mutual Fund Dealer business, or both.</p>	A/A	ID	MFD
<p>C11. Reporting on Client Positions held outside the Member</p> <p>Describe in detail the Member's plans to address the requirement to report on client positions held outside the Member (e.g., mutual funds held in client name at the fund company, GICs held in client name at the issuer) in accordance with Section 3809 of the Investment Dealer and Partially Consolidated Rules.</p> <div style="border: 1px solid black; height: 60px; margin-top: 10px;"></div>	A/A	ID	MFD
D. OWNERSHIP STRUCTURE			
<p>D1. Changes to Corporate Structure Ownership, etc.</p> <p>Will there be changes to the Member's corporate structure, ownership (including beneficial ownership interest), associates, affiliates, related companies, or capital structure?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No (If 'Yes,' please provide full details, then proceed to D1.1. If 'No,' proceed to D2.)</p> <div style="border: 1px solid black; height: 45px; margin-top: 10px;"></div> <p>D1.1. Ownership Chart</p> <p>Attach a chart showing the firm's structure and ownership, including the percentage held. Include all associates, affiliates, and related parties of the Member.</p> <p>D1.2. Associates and Affiliates</p> <p>Provide the names of all associates and affiliates of the Member and details of the nature of their business.</p> <div style="border: 1px solid black; height: 40px; margin-top: 10px;"></div> <p>D1.3. Related Company or Related Member Firm</p> <p>Identify any associate or affiliate of the Member that meets the definition of "related company" as set out in Section 1200 of the Investment Dealer and Partially Consolidated Rules, or that is a related Member firm.</p> <div style="border: 1px solid black; height: 40px; margin-top: 10px;"></div>	A/A	ID	MFD

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	A/A	ID	MFD
<p>D2. Interest in the Member's Capital</p> <p>Are there any persons, firms or corporations that have an interest either directly or indirectly in the Member's capital whether by way of loan, guarantee, ownership of securities, or otherwise, that have not been previously disclosed to CIRO?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No (If 'Yes,' proceed to D2.1 and D2.2. If 'No,' proceed to E1.)</p> <p>D2.1. 10% or more of Member's Securities</p> <p>Do any persons, firms or corporations hold directly or indirectly 10% or more of the Member's voting or participating securities or total equity?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No (If 'Yes,' please attach an Investor Application Form for each of those investors.)</p> <p>D2.2. Less than 10% of Member's Securities</p> <p>Do any persons, firms or corporations hold directly or indirectly less than 10% of the Member's voting or participating securities or total equity?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No (If 'Yes,' please attach an Investor Notification Form for each of those investors.)</p>	A/A	ID	MFD
E. DIRECTORS AND EXECUTIVES			
<p>E1. Changes to Directors or Executives</p> <p>Are there any changes to the Member's Board of Directors or Executives, including the Ultimate Designated Person (UDP), Chief Compliance Officer (CCO) or Chief Financial Officer (CFO)?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No (If 'Yes,' please provide full details, then proceed to E1.1. If 'No,' proceed to E2.)</p> <div style="border: 1px solid black; height: 40px; margin-top: 5px;"></div> <p>E1.1. New Directors or Executives information</p> <p>Please provide the following information for each new Director or Executive of the Member:</p> <ul style="list-style-type: none"> ▪ full name and business title ▪ NRD number (if currently registered) ▪ phone number and email address (only required for the UDP, CCO and CFO) ▪ a description of how the individual meets the proficiency and experience requirements for their requested registration category in Section 2602 of the Investment Dealer and Partially Consolidated Rules. ▪ a description of how the individual meets the general requirements for Directors or Executives, as applicable, in Sections 2502 and 2503 of the Investment Dealer and Partially Consolidated Rules. <div style="border: 1px solid black; height: 40px; margin-top: 5px;"></div>	A/A	ID	MFD
<p>E2. Chief Compliance Officer (CCO) or Ultimate Designated Person (UDP)</p> <p>Does the Member intend to have separate CCOs and/or UDPs for its Investment Dealer business and Mutual Fund Dealer business?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No (If 'Yes,' please provide full details.)</p> <p><i>Note: Firms should consult with the securities regulatory in their principal jurisdiction on how to apply for exemptive relief from the applicable requirements of National Instrument 31-103 regarding designating an individual as the UDP and/or CCO.</i></p> <div style="border: 1px solid black; height: 40px; margin-top: 5px;"></div>	A/A	ID	MFD
<p>E3. Significant Areas of Risk and Responsible Executive(s)</p> <p>Provide a list of the Member's significant areas of risk and the Executive(s) responsible for managing that area of risk, as described in Sections 1501 and 1502 of the Investment Dealer and Partially Consolidated Rules.</p> <div style="border: 1px solid black; height: 40px; margin-top: 5px;"></div>			MFD

Complete the Questions for the applicable Type of Dealer Member (DM)	Type of DM		
	A/A	ID	MFD
F. BUSINESS OPERATIONS			
<p>F1. Head Office Location(s)</p> <p>Provide the full address, telephone number, fax number and website address for the Member's head office location(s). If the Member plans to have separate head offices for its Investment Dealer business and Mutual Fund Dealer business, please provide those details.</p> <div style="border: 1px solid black; height: 40px; width: 100%;"></div>	A/A		
<p>F2. Jurisdictions where Investment Dealer Business or Mutual Fund Dealer Business will be Conducted - Changes</p> <p>Is the Member changing the province(s) and/or territory(ies) where it conducts Investment Dealer business or Mutual Fund Dealer business?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <i>(If 'Yes,' please provide full details.)</i></p> <div style="border: 1px solid black; height: 40px; width: 100%;"></div>	A/A	ID	MFD
<p>F3. Mutual Fund Dealer Business in Quebec</p> <p>Does the Member currently conduct, or does it plan to conduct, Mutual Fund Dealer business in Quebec?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <i>(If 'Yes,' proceed to F3.1. If 'No,' proceed to F4.)</i></p> <p>F3.1. Mutual Fund Dealer Business in Quebec – Exemptive Relief</p> <p>Regarding the member's Mutual Fund Dealer business in Quebec, does the member plan to apply for exemptive relief from either of the following:</p> <p>F3.1.1. Exemptive relief from the applicable requirements of Regulation 31-103?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <i>(If 'Yes,' please provide full details.)</i></p> <div style="border: 1px solid black; height: 40px; width: 100%;"></div> <p>F3.1.2. Exemptive relief from the applicable requirements of the Mutual Fund Dealer Rules?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <i>(If 'Yes,' please provide full details.)</i></p> <div style="border: 1px solid black; height: 40px; width: 100%;"></div>	A/A	ID	MFD
<p>F4. Business Location Changes</p> <p>Is the Member: (a) opening any new business locations, (b) closing any existing business locations, or (c) planning to conduct both Investment Dealer business and Mutual Fund Dealer business at any existing business locations where that is not already occurring?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <i>(If 'Yes,' please complete the Business Location(s) Changes template.)</i></p>	A/A	ID	MFD
<p>F5. Business Name(s) or Trade Name(s)</p> <p>Does the Member plan to use any business name or trade name that has not been previously reported to CIRO?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <i>(If 'Yes,' please provide full details.)</i></p> <div style="border: 1px solid black; height: 40px; width: 100%;"></div>	A/A	ID	MFD
<p>F6. Principal Business, Products and Services</p> <p>Will there be changes to the Member's principal business activities, or to the products or services offered?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No <i>(If 'Yes,' please provide full details.)</i></p> <div style="border: 1px solid black; height: 40px; width: 100%;"></div>	A/A	ID	MFD

Complete the Questions for the applicable Type of Dealer Member (DM)	Type of DM		
	A/A	ID	MFD
<p>F7. Principal Investment Dealer Business</p> <p>Indicate the Member's principal Investment Dealer business (select all that apply).</p> <p> <input type="checkbox"/> Carrying Broker <input type="checkbox"/> Corporate Finance <input type="checkbox"/> Institutional <input type="checkbox"/> Managed Accounts <input type="checkbox"/> Order Execution Only <input type="checkbox"/> Research <input type="checkbox"/> Retail - Advisory <input type="checkbox"/> Proprietary Trading / Market Making <input type="checkbox"/> Facilitation Trading (e.g., ATS Debt, ATS Equity, Direct Electronic Access) <input type="checkbox"/> Financing (e.g., call loans, securities borrowing and lending) <input type="checkbox"/> Other (Describe below) </p> <div style="border: 1px solid black; height: 40px; width: 100%;"></div>	A/A	ID	MFD
<p>F8. Participating Organization</p> <p>Will the Member be a new participating organization ("PO") in that it will become: (a) a member of an Exchange, (b) a user of a recognized quotation and trade reporting system ("QTRS"), or (c) a subscriber of an Alternative Trading System ("ATS")?</p> <p> <input type="checkbox"/> Yes <input type="checkbox"/> No <i>(If 'Yes,' proceed to F8.1. If 'No,' proceed to F9.)</i> </p> <p>F8.1. Participating Organization – Supporting Documents</p> <p>Please provide the following documentation to support the Member's proposal to become a participating organization:</p> <p>F8.1.1. A detailed description of the trading activities/strategies, security types, client base, agency or proprietary, etc.</p> <div style="border: 1px solid black; height: 60px; width: 100%;"></div> <p>F8.1.2. A trade flow diagram, from order entry to execution on a marketplace.</p> <p>F8.1.3. Policies and procedures to address applicable Universal Market Integrity Rules (UMIR) requirements.</p>	A/A		MFD
<p>F9. Investment Dealer Products & Services</p> <p>What products or services will the Member trade, deal in or offer through its Investment Dealer business? (Select all that apply.)</p> <p> <input type="checkbox"/> Equities <input type="checkbox"/> Exchange traded funds (ETFs) <input type="checkbox"/> Exempt market products <input type="checkbox"/> Financial Planning <input type="checkbox"/> Digital assets (e.g., crypto contracts) <input type="checkbox"/> Fixed Income <input type="checkbox"/> Listed Derivatives (e.g., options, futures) <input type="checkbox"/> Mutual Funds <input type="checkbox"/> OTC Derivatives (e.g., CFDs) <input type="checkbox"/> Other (Describe below) </p> <div style="border: 1px solid black; height: 40px; width: 100%;"></div>	A/A	ID	MFD
<p>F10. Mutual Fund Dealer Products & Services</p> <p>What products or services will the Member trade, deal in or offer through its Mutual Fund Dealer business? (Select all that apply.)</p> <p> <input type="checkbox"/> Financial Planning <input type="checkbox"/> Any exempt market products not already listed above <input type="checkbox"/> Limited Partnerships <input type="checkbox"/> Exchange traded funds (ETFs) <input type="checkbox"/> Segregated Funds <input type="checkbox"/> GICs or other Deposit Instruments <input type="checkbox"/> Mutual Funds <input type="checkbox"/> Hedge Funds or Alternative Mutual Funds </p>	A/A	ID	MFD

Complete the Questions for the applicable Type of Dealer Member (DM)	Type of DM		
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<input type="checkbox"/> Labour Sponsored Investment Funds <input type="checkbox"/> Other (Describe below) <div style="border: 1px solid black; height: 40px; margin-top: 5px;"></div>			
F11. Other Business Will the Member engage in any business, other than the sale of investment products and services that has not been previously disclosed to CIRO? <input type="checkbox"/> Yes <input type="checkbox"/> No <i>(If 'Yes,' please provide full details.)</i> <div style="border: 1px solid black; height: 35px; margin-top: 5px;"></div>	A/A	ID	MFD
G. DEALER ARRANGEMENTS			
G1. Continuing Introducing/Carrying Arrangements Does the Member have any existing Introducing/Carrying Broker Arrangement(s) or Introducing/Carrying Dealer Arrangement(s) that will continue after it becomes dual-registered? <input type="checkbox"/> Yes <input type="checkbox"/> No <i>(If 'Yes,' please provide full details.)</i> <div style="border: 1px solid black; height: 35px; margin-top: 5px;"></div>	A/A	ID	MFD
G2. New Introducing/Carrying Arrangements Does the Member plan to enter into any new Introducing/Carrying Broker Arrangements or Introducing/Carrying Dealer Arrangements once it becomes dual-registered? <input type="checkbox"/> Yes <input type="checkbox"/> No <i>(If 'Yes,' provide full details and a copy of the signed Introducing/Carrying Agreements.)</i> <div style="border: 1px solid black; height: 35px; margin-top: 5px;"></div>	A/A	ID	MFD
G3. Outsourcing Arrangements Is the Member making changes to any of its existing outsourcing arrangements with a Service Provider(s) or entering into any new outsourcing arrangements with a Service Provider(s)? <input type="checkbox"/> Yes <input type="checkbox"/> No <i>(If 'Yes,' provide full details and a copy of the signed Service Agreements.)</i> <div style="border: 1px solid black; height: 35px; margin-top: 5px;"></div>	A/A	ID	MFD
G4. Financial Intermediaries Does the Member use a financial intermediary for trade execution, settlement, or custody of securities for its Mutual Fund Dealer business? <input type="checkbox"/> Yes <input type="checkbox"/> No <i>If 'Yes,' please provide full details, including whether the Member will continue using the financial intermediary upon approval of dual registration.</i> <div style="border: 1px solid black; height: 35px; margin-top: 5px;"></div>	A/A		MFD
G5. Principal/Agent Agreements Does the Member plan to enter into any new Agency Agreements or revise its existing Agency Agreements with its Approved Persons? <input type="checkbox"/> Yes <input type="checkbox"/> No <i>(If 'Yes,' proceed to G5.1 and G5.2. If 'No,' proceed to G6.)</i> G5.1. Agency Agreement(s) Provide a copy of the new or revised Agency Agreement(s). G5.2. Member Agreement with CIRO	A/A	ID	MFD

Complete the Questions for the applicable Type of Dealer Member (DM)	Type of DM		
	A/A	ID	MFD
Provide the new or revised written agreement that the Member intends to enter into with CRO that describes the Member's responsibility for the Agent's conduct relating to Member business, as required by Section 2303 of the Investment Dealer and Partially Consolidated Rules.			
G6. Approved Person Compensation and Incentive Program Will the Member have a new or revised compensation and incentive program for its Approved Persons (e.g., Dealing Representatives and Supervisors) as a dual-registered firm? <input type="checkbox"/> Yes <input type="checkbox"/> No <i>(If 'Yes,' please provide full details.)</i> <div style="border: 1px solid black; height: 40px; width: 100%; margin-top: 5px;"></div>	A/A	ID	MFD
G7. Payment to an Unregistered Corporation Will the Member pay any remuneration, gratuity benefit or other consideration in respect of business conducted by a Mutual-Funds-only Dealing Representative on behalf of the Member to an unregistered corporation, where permitted by local securities legislation? <input type="checkbox"/> Yes <input type="checkbox"/> No <i>(If 'Yes,' please provide full details.)</i> <div style="border: 1px solid black; height: 80px; width: 100%; margin-top: 5px;"></div>	A/A	ID	MFD
H. FINANCIAL OPERATIONS			
H1. Fiscal Year End Provide the Member's fiscal year end: <div style="border: 1px solid black; height: 25px; width: 100%; margin-top: 5px;"></div>	A/A		
H2. Minimum Capital Requirements Provide pro forma financial statements and capital projections to demonstrate the Member's ability to meet applicable Investment Dealer capital requirements and any enhanced requirements pertinent to new and additional business lines.			MFD
H3. Panel Auditor Provide the name of the Member's external audit firm that is approved as a panel auditor eligible to perform the audit of the Member's fiscal year Form 1 filing, as required by Section 4172 of the Investment Dealer and Partially Consolidated Rules. <div style="border: 1px solid black; height: 60px; width: 100%; margin-top: 5px;"></div>			MFD
H4. Insurance Coverage - Changes Is the Member: (i) amending its existing Financial Institution Bond ("FIB"), errors and omission insurance, or surety bonding insurance; or (ii) obtaining a new FIB or insurance? <input type="checkbox"/> Yes <input type="checkbox"/> No <i>(If 'Yes,' please provide full details and a copy of the new or updated policy.)</i> <div style="border: 1px solid black; height: 80px; width: 100%; margin-top: 5px;"></div>	A/A	ID	MFD

Complete the Questions for the applicable Type of Dealer Member (DM)	Type of DM		
	A/A	ID	MFD
<p>H5. Custodial Agreements – Changes</p> <p>Is the Member: (i) amending its existing custodial agreements; or (ii) obtaining new custodial agreements? <input type="checkbox"/> Yes <input type="checkbox"/> No <i>(If 'Yes,' please provide copies of the new or updated custodial agreements.)</i></p>	A/A	ID	MFD
<p>H6. Financial Reporting Infrastructure</p> <p>Describe the Member's financial reporting infrastructure to meet its reporting obligations, including the required Monthly Financial Reports, Form 1, and weekly and intra-day RAC monitoring.</p> <div style="border: 1px solid black; height: 40px; width: 100%;"></div>			MFD
I. POLICIES, PROCEDURES AND SUPERVISION			
<p>I1. Corporate Governance - Changes</p> <p>Will there be changes to the Member's corporate governance document that sets out the organizational structure and reporting relationships (i.e., the applicant's chain of senior management, supervisory accountability, and responsibilities)? <input type="checkbox"/> Yes <input type="checkbox"/> No <i>If 'Yes,' please provide full details and a copy of the revised Corporate Governance Document.</i></p> <div style="border: 1px solid black; height: 40px; width: 100%;"></div>	A/A	ID	MFD
<p>I2. Supervision Framework – Changes</p> <p>Will there be changes to the Member's supervision framework, including the Member's supervisory structure and personnel, or its supervisory systems and processes? <input type="checkbox"/> Yes <input type="checkbox"/> No <i>(If 'Yes,' please provide full details, then proceed to I2.1. If 'No,' proceed to I3.)</i></p> <div style="border: 1px solid black; height: 40px; width: 100%;"></div> <p>I2.1. Supervisors / Designated Supervisors – Changes</p> <p>Please describe in detail any changes to the Member's Supervisors (including Designated Supervisors) responsible for the areas listed below. This includes the introduction of any new Supervisors.</p> <ul style="list-style-type: none"> <input type="checkbox"/> supervision of RRs or IRs <input type="checkbox"/> supervision of the opening of new accounts and the supervision of account activity <input type="checkbox"/> supervision of pre-approval of advertising, sales literature and correspondence <input type="checkbox"/> supervision of managed accounts (if applicable) <input type="checkbox"/> supervision of discretionary accounts (if applicable) <input type="checkbox"/> supervision of options accounts (if applicable) <input type="checkbox"/> supervision of futures contract / futures contract options accounts (if applicable) <input type="checkbox"/> supervision of research reports (if applicable) <div style="border: 1px solid black; height: 40px; width: 100%;"></div> <p>I2.2. Supervisors / Designated Supervisors</p> <p>Please provide the following information for each new Supervisor or Designated Supervisor of the Member:</p> <ul style="list-style-type: none"> ▪ full name ▪ NRD number (if currently registered) ▪ the category of Supervisor or Designated Supervisor ▪ a detailed description of how the individual meets the proficiency and experience requirements for their requested registration category, in accordance with Section 2602 of the Investment Dealer and Partially Consolidated Rules. <div style="border: 1px solid black; height: 40px; width: 100%;"></div>	A/A	ID	MFD

Complete the Questions for the applicable Type of Dealer Member (DM)	Type of DM		
	A/A	ID	MFD
<p>12.3. Account Supervision Processes</p> <p>Describe the Member's process for conducting account supervision and what changes will be implemented for the Member to meet its supervision obligations as a dual-registered firm. Include a description of the tool(s) or system(s) used to conduct account reviews, the personnel conducting those reviews, and the Member's procedures for maintaining evidence of supervision.</p> <div style="border: 1px solid black; height: 40px; width: 100%;"></div>	A/A	ID	MFD
<p>13. Policies & Procedures</p> <p>Provide any new or revised policies and procedures that the Member will have in place to comply with any CIRO requirements that will be newly applicable to the Member upon approval of dual registration.</p>	A/A	ID	MFD
<p>14. Borrowing for Investment Purposes</p> <p>Describe the Member's policies and procedures for assessing the suitability of "borrowing to invest" strategies and the Member's framework and criteria for supervising the use of such strategies.</p> <div style="border: 1px solid black; height: 40px; width: 100%;"></div>	A/A	ID	MFD
<p>15. Cybersecurity Incident Reporting Procedures</p> <p>Describe the Member's cybersecurity incident reporting procedures and infrastructure to identify and report any such events to CIRO.</p> <div style="border: 1px solid black; height: 40px; width: 100%;"></div>			MFD
<p>16. Designated Complaints Officer</p> <p>Provide the full name of the Member's designated complaints officer for its Investment Dealer business, as required in Section 3722 of the Investment Dealer and Partially Consolidated Rules.</p> <div style="border: 1px solid black; height: 40px; width: 100%;"></div>			MFD
<p>17. Mutual Fund Dealer Branch Review Program</p> <p>Describe how the Member will address the requirements of Section 500 - Branch Review Requirements of the Mutual Fund Dealer Rules.</p> <div style="border: 1px solid black; height: 40px; width: 100%;"></div>	A/A	ID	
<p>18. Remote Branch Supervision</p> <p>Does the Member's branch supervision structure for its Mutual Fund Dealer business involve remote supervision, where the designated branch manager is not normally present at that branch location?</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p> <p><i>If 'Yes,' provide the Member's proposal for remote supervision, as required by Mutual Fund Dealer Rule 2.4.4(c), and described in MFDA MSN-0082 Branch Supervision.</i></p>	A/A	ID	
J. KEY CONTACT			
<p>J1. Key Contact</p> <p>Please provide the full name of the individual(s) to contact regarding this Dual-Registration Questionnaire (i.e., key contact person), along with their telephone number and email address.</p> <div style="border: 1px solid black; height: 40px; width: 100%;"></div>	A/A	ID	MFD

CERTIFICATE AND AGREEMENT

The Member hereby certifies that the foregoing statements are true and correct and hereby undertakes to notify the Canadian Investment Regulatory Organization (CIRO) in writing of any material changes herein as prescribed in the Rules.

DATED at _____ this ____ day _____ of _____.

BY

Print Name of Member

Print Name of Executive

Business Title

Signature of Executive

Dual-Registration Documentation Checklist

Refer to the table below for a list of supporting documents, forms, and other materials that must be submitted with the Dual-Registration Questionnaire, where applicable.

Dual-Registration Questionnaire – Section Reference		Requested Document	Prescribed Form or Template	Link to Form or Template		Type of Dealer Member			Applicant to Complete	
				EN	FR	A/A	ID	MFD	Attached	N/A
A	GENERAL INFORMATION									
A4.1	Change in Legal Name	Articles of Amendment evidencing change in legal name					ID	MFD	<input type="checkbox"/>	<input type="checkbox"/>
B	ACQUISITION OR AMALGAMATION									
B1	Details of Proposed Reorganization, Acquisition or Amalgamation	Written Notice of Proposed Reorganization, Acquisition or Amalgamation				A/A			<input type="checkbox"/>	<input type="checkbox"/>
B2	Legal Name of Continuing Firm	Articles of Amendment evidencing change in legal name				A/A			<input type="checkbox"/>	<input type="checkbox"/>
B3.1	Continuing Member Undertaking and Financial Statements	Continuing Member Letter of Undertaking				A/A			<input type="checkbox"/>	<input type="checkbox"/>
B3.2	Continuing Member Undertaking and Financial Statements	Continuing Member Pro Forma Financial Statements				A/A			<input type="checkbox"/>	<input type="checkbox"/>
B4	Resignation of Existing Member(s)	Letter of Resignation and supporting documents				A/A			<input type="checkbox"/>	<input type="checkbox"/>
C	INTEGRATION PLAN									
C1	Organization of Investment Dealer and Mutual Fund Dealer Business	Detailed Plan for Operating as a Dual-Registered Dealer				A/A	ID	MFD	<input type="checkbox"/>	<input type="checkbox"/>
C7.1	Application for Exemptive Relief - Business Case	Application for Exemptive Relief - Business Case				A/A	ID	MFD	<input type="checkbox"/>	<input type="checkbox"/>
C9.1	Client Account Opening Documents - Samples	Samples of Client Account Opening Documents				A/A	ID	MFD	<input type="checkbox"/>	<input type="checkbox"/>
C10.1	Client Disclosures - Samples	Samples of Client Disclosures				A/A	ID	MFD	<input type="checkbox"/>	<input type="checkbox"/>
D	OWNERSHIP STRUCTURE									
D1.1	Ownership Chart	Corporate Ownership Chart				A/A	ID	MFD	<input type="checkbox"/>	<input type="checkbox"/>
D2.1	Interest in the Member's Capital (10% or More)	Investor Application Form	Yes	EN	FR	A/A	ID	MFD	<input type="checkbox"/>	<input type="checkbox"/>
D2.2	Interest in the Member's Capital (Less than 10%)	Investor Notification Form	Yes	EN	FR	A/A	ID	MFD	<input type="checkbox"/>	<input type="checkbox"/>
E	DIRECTORS AND EXECUTIVES									
F	BUSINESS OPERATIONS									
F4	Business Location Changes	Business Location(s) Changes List	Yes	EN	FR	A/A	ID	MFD	<input type="checkbox"/>	<input type="checkbox"/>
F8.1.2	Participating Organization - Supporting Documents	Trade Flow Diagram				A/A		MFD	<input type="checkbox"/>	<input type="checkbox"/>
F8.1.3	Participating Organization - Supporting Documents	Policies & Procedures to address UMIR requirements				A/A		MFD	<input type="checkbox"/>	<input type="checkbox"/>
G	DEALER ARRANGEMENTS									
G2	Introducing/Carrying Arrangements	Signed Introducing/Carrying Broker Agreement(s) or Introducing/Carrying Dealer Agreement(s)	Yes (ID)	Type 1 - EN	Type 1 - FR	A/A	ID	MFD	<input type="checkbox"/>	<input type="checkbox"/>
			Yes (ID)	Type 2 - EN	Type 2 - FR	A/A	ID	MFD	<input type="checkbox"/>	<input type="checkbox"/>
			Yes (ID)	Type 3 - EN	Type 3 - FR	A/A	ID	MFD	<input type="checkbox"/>	<input type="checkbox"/>
			Yes (ID)	Type 4 - EN	Type 4 - FR	A/A	ID	MFD	<input type="checkbox"/>	<input type="checkbox"/>
G3	Outsourcing Arrangements	Signed Outsourcing or Service Agreements				A/A	ID	MFD	<input type="checkbox"/>	<input type="checkbox"/>
G5.1	Agency Agreement(s)	New or Revised Principal/Agent Agreement(s)				A/A	ID	MFD	<input type="checkbox"/>	<input type="checkbox"/>

Dual-Registration Questionnaire – Section Reference		Requested Document	Prescribed Form or Template	Link to Form or Template		Type of Dealer Member			Applicant to Complete	
				EN	FR	A/A	ID	MFD	Attached	N/A
G5.2	Member Agreement with CIRO	Written Agreement with CIRO regarding Agents	Yes	EN	FR	A/A	ID	MFD	<input type="checkbox"/>	<input type="checkbox"/>
H	FINANCIAL OPERATIONS									
H2	Minimum Capital Requirements	Pro forma Financial Statements						MFD	<input type="checkbox"/>	<input type="checkbox"/>
H4	Insurance Coverage - Changes	New or Revised Insurance Policy(ies)				A/A	ID	MFD	<input type="checkbox"/>	<input type="checkbox"/>
H5	Custodial Agreements - Changes	New or Revised Custodial Agreements				A/A	ID	MFD	<input type="checkbox"/>	<input type="checkbox"/>
I	POLICIES, PROCEDURES AND SUPERVISION									
I1	Corporate Governance - Changes	Revised Corporate Governance Document				A/A	ID	MFD	<input type="checkbox"/>	<input type="checkbox"/>
I3	Policies & Procedures	New or Revised Policies & Procedures				A/A	ID	MFD	<input type="checkbox"/>	<input type="checkbox"/>
I8	Remote Branch Supervision	Remote Supervision Proposal				A/A	ID		<input type="checkbox"/>	<input type="checkbox"/>