CIRO · OCRI

Membership Intake

Year In Review

FY2025

What We Do

The Membership Intake team is the first point of contact for CIRO Members who are looking to engage in new business lines as well as new applicants seeking CIRO Membership. Membership Intake was formed to create a more efficient and consistent membership process that is aligned with supporting industry transformation.

The Membership Intake team is comprised of individuals specializing in four main compliance areas: Business Conduct Compliance, Financial and Operations Compliance, Registration, and Trading Conduct Compliance. This dedicated team manages new membership applications and material business changes for Dealer Members (or **“membership transactions”**) across Canada.

Highlights of FY2025

Membership Trends

CIRO's membership numbers remained relatively flat in FY2025 with the number of firms entering membership almost equaling the number of firms exiting membership. This was also the case in FY2024. There was a slight increase in resignations in FY2025, mostly due to changes that were made to the Québec Immigrant Investor Program (QIIP) that prompted firms to resign from membership.

The composition of CIRO membership has remained fairly consistent as well, with the exception of the new dual registration and Crypto Asset Trading Platform categories of firms. One notable addition to CIRO membership was the admittance of Cedar Leaf Capital Inc, Canada's first majority Indigenous-owned investment dealer.

Compared to FY2024, we had a 33% increase in the number of membership applications in our review pipeline in FY2025, primarily as a result of Crypto Asset Trading Platforms applying for membership. In addition to managing the 16 membership applications that were either received or closed in FY2025, Membership Intake also engaged in initial discussions with an additional 17 prospective applicants to answer questions regarding the application process and membership requirements, and to discuss their firm's proposed business model. Given this considerable interest in CIRO membership, we expect additional new members in the upcoming year.

Highlights of FY2025

Material Business Changes

In recent years, we have seen an increase in "material business change" requests from Member firms. This trend continued in FY2025 as we saw a 45% increase in material business change requests compared to FY2024. Most commonly, Members wanted to make operational changes to their carrying arrangements, trade execution arrangements, and/or trade clearing arrangements. These changes were primarily driven by Members' commercial decisions to access additional services from their back-office service providers, or to improve costs.

On the retail side, the most common request received was from Members wanting to offer managed account solutions, which is consistent with prior years. Other types of new product or service offerings for retail firms included fully paid lending, trading in listed equities or options, and trading in OTC securities. While there was a small percentage of requests to close a line of business or discontinue offering a certain product or service, none had a material impact on the Members' overall business.

We expect to see the same level of business change requests in the upcoming year as Members continue to optimize their back-office service arrangements and expand their product and service offerings to their retail clients.

Highlights of FY2025

Dual Registration

Five Members took advantage of the ability to become dually registered as an Investment Dealer **(ID)** and Mutual Fund Dealer (**MFD**). This was an increase from the 2 dual registration applications that were in our review pipeline in FY2024. In some cases, the Member applied for exemptive relief from certain requirements of the Investment Dealer and Partially Consolidated Rules so that they could continue to follow the Mutual Fund Dealer Rules for certain activities within the mutual fund division of the dual-registered firm. Exemptive relief has allowed Members to minimize disruption to their business operations and to their clients during the interim period before the Dealer and Consolidated Rules come into effect. Further information on the exemptions that have been granted in connection with dual-registration is available on CIRO.ca at **Exemptions granted by CIRO in 2023**.

While ID Members adding MFD registration remains the most common path to dual-registration, in FY2024, we began to see the amalgamation of affiliated IDs and MFDs. Amalgamation proposals continued in FY2025 and we expect the trend to continue in the upcoming year as Members look to improve operational efficiencies and provide mutual fund advisors and their clients with the ability to transition to a broader range of investment products without having to transfer to their affiliated ID or to another ID Member.

Highlights of FY2025

Crypto Asset Trading Platforms (CTPs)

On August 6, 2024, the Canadian Securities Administrators (**CSA**) and CIRO issued a **news release** reminding Crypto Asset Trading Platforms to prioritize their applications for registration as Investment Dealers and membership with CIRO. Within the year, CIRO approved two new CTPs for membership, bringing the total to four. CTP applications take considerable time as we work with the applicants and the CSA to create a pathway to CIRO membership. We expect to see more CTP applications in FY2026 as existing CTPs transition to CIRO membership or look to conduct business in Canada.

Membership Transactions

New Dealer Members

	Firm Name	Type	Peer Group
1	Cedar Leaf Capital Inc.	Investment Dealer	Corporate Finance
2	Fidelity Wealth ULC	Investment Dealer & Mutual Fund Dealer	Retail
3	tastytrade Canada Inc.	Investment Dealer	Order Execution Only
4	Shakepay Inc.	Investment Dealer	CTP
5	NDAX Canada Inc.	Investment Dealer	CTP

Membership Applications and Expressions of Interest

APPLICATIONS FOR MEMBERSHIP (Received or Closed)	FY2025		FY2024	
	#	%	#	%
Investment Dealer	9	56%	7	58%
Investment Dealer - CTP	6	38%	3	25%
Mutual Fund Dealer	1	6%	2	17%
TOTAL	**16**		**12**	

EXPRESSIONS OF INTEREST	#	%
Investment Dealer	7	41%
Investment Dealer - CTP	9	53%
Mutual Fund Dealer	1	6%
TOTAL	**9**	

Membership Transactions

Resignations

	Firm Name	Type	Peer Group
1	Stuart Investment Management Limited	Investment Dealer	Institutional (QIIP)
2	FIN-XO Securities Inc.	Investment Dealer	Institutional (QIIP)
3	Renaissance Capital Inc	Investment Dealer	Institutional (QIIP)
4	Leduc International Financial Services Inc.	Investment Dealer	Institutional (QIIP)
5	Virtu Financial Canada, ULC	Investment Dealer	Institutional
6	Vered Wealth Management (Canada) Company Limited	Investment Dealer	Retail
7	Admiral Markets Canada Ltd.	Investment Dealer	Order Execution Only

Material Business Changes for Current Members

MATERIAL BUSINESS CHANGES (Received or Closed)		FY2025		FY2024	
		#	%	#	%
1	New Product or Service - Retail	19	31%	12	29%
2	Change in Back-Office Arrangement or Process	18	30%	14	33%
3	New Product or Service - Institutional	7	11%	6	14%
4	Closing a Line of Business	7	11%	3	7%
5	Acquisition or Amalgamation	6	10%	5	12%
6	New Product or Service – CTP	4	7%	2	5%
	TOTAL	**61**		**42**	

Membership Transactions

Dual-Registration

At the end of FY2025, there were nine members approved for dual-registration, where each member holds both Investment Dealer and Mutual Fund Dealer registration within the same legal entity.

1	AimStar Capital Group Inc.	6	Foster & Associates Financial Services Inc.
2	Assante Capital Management Ltd.	7	iA Private Wealth Inc.
3	Aviso Financial Inc.	8	Manulife Wealth Inc.
4	Designed Securities Ltd.	9	Nour Private Wealth Inc.
5	Fidelity Wealth ULC		

Dual-Registration Applications and Expressions of Interest

MATERIAL BUSINESS CHANGES (Received or Closed)	FY2025		FY2024	
	#	%	#	%
APPLICATIONS				
Investment Dealer (ID) adding Mutual Fund Dealer registration	3	60%	1	50%
Mutual Fund Dealer (MFD) adding ID registration	-	-	-	-
Amalgamation of affiliated ID & MFD	2	40%	1	50%
TOTAL	**5**		**2**	
EXPRESSIONS OF INTEREST				
ID adding MFD registration	-	-		
MFD adding ID registration	3	75%		
Amalgamation of affiliated ID & MFD	1	25%		
TOTAL	**4**			

Membership Transactions

Integrated Fee Model for Membership Transactions

CIRO's **integrated fee model** **(Fee Model)** came into effect on April 1, 2025. The Fee Model includes revisions to the Entrance Fee paid by firms applying for membership, as well as new fees for members proposing material business changes. The new fees are intended to recover some of CIRO's costs associated with our review of material business changes from the Members that make use of those regulatory resources.

The Fee Model also includes fees charged for the reimbursement of extraordinary costs and expenses related to CIRO's review of a membership transaction, which apply when a membership application or transaction remains under compliance review after six months. This may occur when a firm is not sufficiently prepared or is delayed in responding to CIRO requests, or when the information and materials provided to CIRO are incomplete or inadequate. The reimbursement rate is included in the Fee Model to provide transparency to members on how the reimbursements will be calculated.

Applicant and Member Resources

Members and prospective applicants are encouraged to refer to CIRO.ca for further information, guidance and tools to assist firms with the following:

Guidance and Tools for Applicants

- **Becoming a Dealer Member**
- Crypto Asset Trading Platforms – Applying for CIRO Membership - **Webcast**
- **Becoming a Dual-Registered Firm**

We invite firms to contact **memberintake@ciro.ca** on any of the above. We also welcome suggestions on what information, guidance and tools would be helpful to assist firms with their membership transactions.

Guidance and Tools for Members

On February 28, 2025, we announced enhancements to the **tools available for members to prepare notices of certain business changes**. This included:

- a **Notice of Material Business Change tool** (for Investment Dealers), along with several tools and checklists to assist Members in preparing supplementary materials to support their Notice of Material Business Change;
- a **Notice of Ownership Change tool (for Investment Dealers)**; and
- a **Notice of Ownership Change tool (for Mutual Fund Dealers)**.

Applicant and Member Resources

These tools are intended to increase efficiencies for Members, provide greater transparency on the information and materials considered in CIRO's review, and reduce unnecessary processing delays.

Further details on the enhanced tools for Members are available in the **Tools for Notifying CIRO of Business Changes webcast**. The webcast qualifies for 0.5 Compliance continuing education (CE) credits available under the Investment Dealer CE program and 0.5 Business Conduct (non-ethics) credits under the Mutual Fund Dealer CE program.

Support for Crypto Asset Trading Platforms Applying for CIRO Membership

In addition to the comprehensive guidance and tools for applicants already available on CIRO.ca under **Becoming a Dealer Member**, we have also published a **Supplemental Documentation Checklist for Crypto Asset Trading Platforms** to assist CTPs in preparing materials to support their Membership Application, as well as existing CIRO Members planning to add a CTP to their business.

We also encourage CTPs to view the **Applying for CIRO Membership webcast**, which was developed specifically for CTPs and provides an overview of the membership application process. The webcast qualifies for 0.25 Compliance CE credits available under the Investment Dealer CE program.

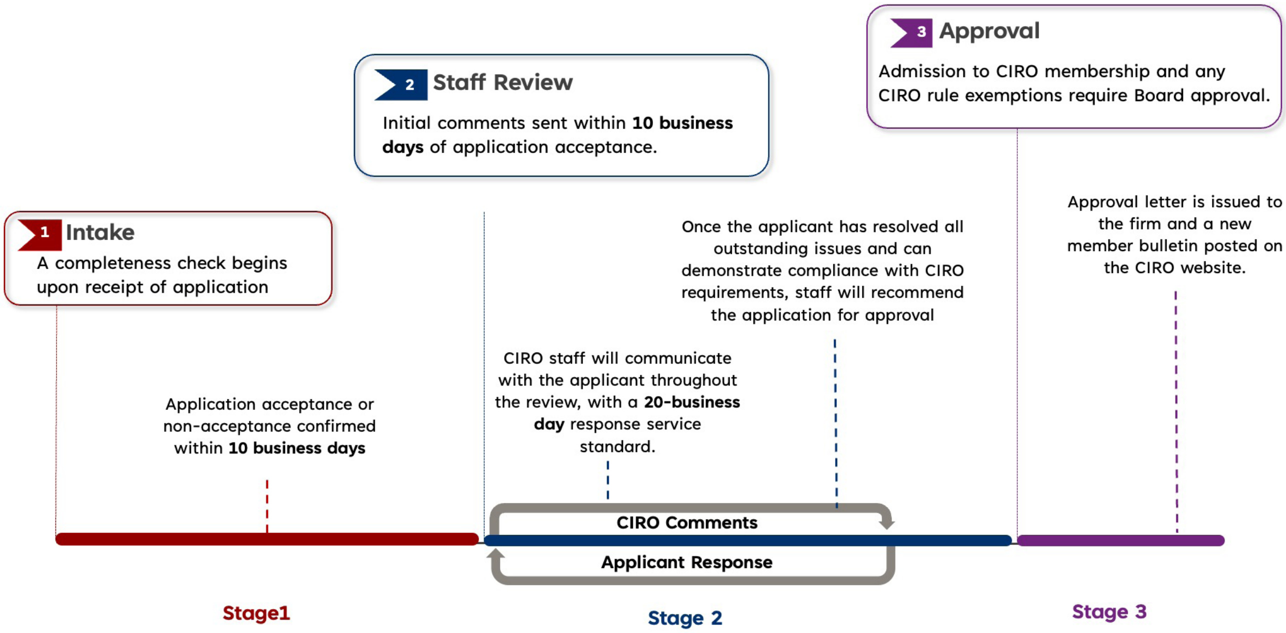
Service Standards

In conjunction with the enhanced tools and guidance noted above, we also announced newly established service standards to ensure timely communications with applicants and Members while the CIRO team processes membership transactions.

Our service standards outline CIRO's response timelines for each submission made by the applicant or Member, whether it is the initial submission or a response to an information request from CIRO staff during the review process. These service standards ensure transparency and consistency, providing applicants and Members with clarity on what to expect from CIRO during the course of our review.

Below is an illustration of CIRO's service standards associated with processing a Membership Application.

Membership Intake Process



For information on the service standards, please visit the Becoming a Dealer Member or Notice of Business Changes on CIRO.ca.