



Appendix 8 - Table of concordance summarizing proposed revisions to IDPC, MFD and CIRO Rules



Appendix 8 - Table of concordance summarizing proposed revisions to IDPC, MFD and CIRO Rules

IDPC Rule	IDPC Rule part and section	Existing IDPC Rule reference	New IDPC Rule reference	MFD Rule	MFD Rule part and section	Existing MFD Rule reference	New MFD Rule reference	CIRO Rule	CIRO Rule part and section	Existing CIRO Rule reference	New CIRO Rule reference	Description	Conclusion	Specific comments	Major revision?	Section within the Rules Bulletin
No equivalent provision	No equivalent provision	N/A	N/A	No equivalent provision	No equivalent provision	N/A	N/A	Rule 1100 - Application and Interpretation	Section 1102 - General application	N/A	1102(1)	Current rule provision relating to the application of Rules that apply to a Dealer Member.	Clarification revisions to IDPC and MFD Rules required.	Retain existing general rule application/interpretation clauses that specify that requirements that apply to a "Dealer Member" also apply to "its employees and Approved Persons", if the context is appropriate.	No	N/A
Rule 1100 - Interpretation	Section 1102 - General interpretation	1102(3)(i)	1102(3)(i)	Rule 1A - Application, Interpretation, Exemptions, and Definitions	Application/Interpretation (i)	Rule 1A, Application / Interpretation (i)	Rule 1A, Application / Interpretation (i)	Rule 1100 - Application and Interpretation	Section 1103 - General interpretation	1103(1)(i)	1103(1)(i)	Current rule provision relating to the application of Rules that apply to a Dealer Member.	Clarification revisions to IDPC and MFD Rules required.	Retain existing general rule application/interpretation clauses that specify that requirements that apply to a "Dealer Member" also apply to "its employees and Approved Persons", if the context is appropriate.	Yes	4.2.2
No equivalent provision	No equivalent provision	N/A	1102(3)(ii)	No equivalent provision	No equivalent provision	N/A	Rule 1A, Application / Interpretation (ii)	No equivalent provision	No equivalent provision	N/A	1103(1)(ii)	There is no specific current rule provision relating to the application of Rules that apply to an Approved Person.	Introduce new general rule application / interpretation provision within both rules that indicates that rules that apply to an "Approved Person" or an "Incorporated Approved Person" also apply to the employees and shareholders of an Incorporated Approved Person if the context is appropriate..	Add new general rule application/interpretation clause to specify that requirements that apply to an "Approved Person" or an "Incorporated Approved Person" also apply to Incorporated Approved Persons and employees and shareholders of Incorporated Approved Persons if the context is appropriate. This revision is required to ensure that rule requirements apply, where appropriate, to key individuals associated with Incorporated Approved Persons sponsored by the Dealer Member.	Yes	4.2.2
No equivalent rule	No equivalent rule	N/A	N/A	Rule 1A - Application, Interpretation, Exemptions, and Definitions	Application/Interpretation (ii)	Rule 1A, Application / Interpretation (ii)	Rule 1A, Application / Interpretation (iii)	No equivalent rule	No equivalent rule	N/A	N/A	Current rule provision that indicates that dual-registered Dealer Members are subject to the IDPC Rules.	Revisions required to MFD Rule provision to clarify which individuals and non-individuals are not subject to the MFD Rules.	Revisions are needed to ensure that mutual fund dealers and the persons that act on their behalf are subject to the same set of rules	Yes	4.2.1
Rule 1100 - Interpretation	Section 1104 - Electronic signatures	1104(1)	1104(1)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 1100 - Interpretation	Section 1106 - Electronic signatures	1106(1)	1106(1)	General rule interpretation provision which allows the use of electronic signatures	No revisions required		N/A	N/A
Rule 1100 - Interpretation	Section 1105 - Transitional provision	1105(1)(iii)	1105(1)(iii)	Rule 1A - Application, Interpretation, Exemptions, and Definitions	Transitional Provisions	Rule 1A, Transitional Provision (1)(iii)	Rule 1A, Transitional Provision (1)(iii)	Rule 1100 - Interpretation	Section 1105 - Transitional provision	1107(1)(iii)	1107(1)(iii)	Transitional rule dealing with the approval status of Approved Persons at time of creation of CIRO.	No revisions required		N/A	N/A
Rule 1200 - Definitions	Section 1201 - Definitions	1201(2), "agent"	1201(2), "agent"	No equivalent definition	No equivalent definition	N/A	Rule 1A, Definitions, "agent"	Rule 1200 - Definitions	Section 1201 - Definitions	1201(2), "agent"	1201(2), "agent"	Definition of "agent"	No revision required to IDPC Rules. Introduce new definition for the term "agent" required within MFD Rules	Clarification revision	No	4.2.3
Rule 1200 - Definitions	Section 1201 - Definitions	1201(2), "Corporation"	1201(2), "Corporation"	No equivalent definition	No equivalent definition	N/A	N/A	Rule 1200 - Definitions	Section 1201 - Definitions	1201(2), "Corporation"	1201(2), "Corporation"	Definition of "CIRO requirements"	No revisions required		N/A	N/A



Appendix 8 - Table of concordance summarizing proposed revisions to IDPC, MFD and CIRO Rules

IDPC Rule	IDPC Rule part and section	Existing IDPC Rule reference	New IDPC Rule reference	MFD Rule	MFD Rule part and section	Existing MFD Rule reference	New MFD Rule reference	CIRO Rule	CIRO Rule part and section	Existing CIRO Rule reference	New CIRO Rule reference	Description	Conclusion	Specific comments	Major revision?	Section within the Rules Bulletin
		requirements "	requirements "							requirements "	requirements "					
Rule 1200 - Definitions	Section 1201 - Definitions	1201(2), "Dealer Member"	1201(2), "Dealer Member"	No equivalent definition	No equivalent definition	N/A	Rule 1A, Definitions, "Dealer Member"	Rule 1200 - Definitions	Section 1201 - Definitions	1201(2), "Dealer Member"	1201(2), "Dealer Member"	Definition of "Dealer Member"	No revision required to IDPC Rules. Introduce new definition for the term "Dealer Member" required within MFD Rules	Clarification revision	No	4.2.3
Rule 1200 - Definitions	Section 1201 - Definitions	1201(2), "employee"	1201(2), "employee"	No equivalent definition	No equivalent definition	N/A	Rule 1A, Definitions, "employee"	Rule 1200 - Definitions	Section 1201 - Definitions	1201(2), "employee"	1201(2), "employee"	Definition of "employee"	No revision required to IDPC Rules. Introduce new definition for the term "employee" required within MFD Rules	Clarification revision	No	4.2.3
Rule 1200 - Definitions	Section 1201 - Definitions	1201(2), "individual"	1201(2), "individual"	No equivalent definition	No equivalent definition	Rule 1A, Definitions, "individual"	Rule 1A, Definitions, "individual"	Rule 1200 - Definitions	Section 1201 - Definitions	1201(2), "individual"	1201(2), "individual"	Definition of "individual"	No revisions required		N/A	N/A
Rule 1200 - Definitions	Section 1201 - Definitions	1201(2), "non-client accounts" or "non-client orders"	1201(2), "non-client accounts" or "non-client orders"	No equivalent definition	No equivalent definition	N/A	N/A	Rule 1200 - Definitions	Section 1201 - Definitions	1201(2), "non-client accounts" or "non-client orders"	1201(2), "non-client accounts" or "non-client orders"	Definition of "non-client accounts" or "non-client orders"	No revisions required		N/A	N/A
Rule 1200 - Definitions	Section 1201 - Definitions	1201(2), "person"	1201(2), "person"	Rule 1A - Application, Interpretation, Exemptions, and Definitions	Definitions	Rule 1A, Definitions, "person"	Rule 1A, Definitions, "person"	Rule 1200 - Definitions	Section 1201 - Definitions	1201(2), "person"	1201(2), "person"	Definition of "person"	No revisions required		N/A	N/A
No equivalent definition	No equivalent definition	N/A	1201(2), "qualified individual financial services advisor"	No equivalent definition	No equivalent definition	N/A	Rule 1A, Definitions, "qualified individual financial services advisor"	No equivalent definition	No equivalent definition	N/A	1201(2), "qualified individual financial services advisor"	Definition of "qualified individual financial services advisor"	Introduce new "qualified individual financial services advisor" defined term to permit qualifying individuals to be voting shareholders of the personal corporation that provides both investment services and .	Definition required to facilitate other financial services advisors having a personal corporation ownership stake	Yes	4.2.1
Rule 1200 - Definitions	Section 1201 - Definitions	1201(2), "records"	1201(2), "records"	Rule 1A - Application, Interpretation, Exemptions, and Definitions	Definitions	Rule 1A, Definitions, "records"	Rule 1A, Definitions, "records"	Rule 1200 - Definitions	Section 1201 - Definitions	1201(2), "records"	1201(2), "records"	Definition of "records"	No revisions required	IDPC Rule defined term refers to "Regulated Person", which is defined to include "Dealer Members" and "Approved Persons", so when read in combination with IDPCR clause 1102(3)(ii), this defined term will also apply to records of (1) Incorporated Approved Persons, and (2) employees and shareholders of Incorporated Approved Persons where the context is appropriate. MFD Rule	No	4.2.2



Appendix 8 - Table of concordance summarizing proposed revisions to IDPC, MFD and CIRO Rules

IDPC Rule	IDPC Rule part and section	Existing IDPC Rule reference	New IDPC Rule reference	MFD Rule	MFD Rule part and section	Existing MFD Rule reference	New MFD Rule reference	CIRO Rule	CIRO Rule part and section	Existing CIRO Rule reference	New CIRO Rule reference	Description	Conclusion	Specific comments	Major revision?	Section within the Rules Bulletin
														defined term refers to "Approved Person", which is defined to include Incorporated Approved Persons, so when read in combination with MFD Rule 1A, Application / Interpretation (ii) this defined term will also apply to records of: (1) Incorporated Approved Persons, and (2) employees and shareholders of Incorporated Approved Persons where the context is appropriate.		
No equivalent definition	No equivalent definition	N/A	1201(2), "regulated Canadian financial services sector"	No equivalent definition	No equivalent definition	N/A	Rule 1A, Definitions, "regulated Canadian financial services sector"	No equivalent definition	No equivalent definition	N/A	1201(2), "regulated Canadian financial services sector"	Definition of "regulated Canadian financial services sector"	Introduce new "regulated Canadian financial services sector" defined term to permit other business lines to be offered through the advisor-owned corporation.	Definition required to facilitate other financial services advisors having a personal corporation ownership stake	Yes	4.2.1
Rule 1200 - Definitions	Section 1201 - Definitions	N/A	1201(2), "related person"	Rule 1A - Application, Interpretation, Exemptions, and Definitions	Definitions	N/A	1201(2), "related person"	Rule 1200 - Definitions	Section 1201 - Definitions	N/A	1201(2), "related person"	Definition of "related person"	Introduce new "related person" defined term.	Definition required as term is now used in multiple sections throughout the rules.	No	N/A
Rule 1200 - Definitions	Section 1201 - Definitions	1201(2), "Rules"	1201(2), "Rules"	Rule 1A - Application, Interpretation, Exemptions, and Definitions	Definitions	Rule 1A, Definitions, "Rules"	Rule 1A, Definitions, "Rules"	Rule 1200 - Definitions	Section 1201 - Definitions	1201(2), "Rules"	1201(2), "Rules"	Definition of "Rules"	No revisions required	MFD Rule defined term refers to "Approved Persons" so when read in combination with MFD Rule 1A, Application / Interpretation (ii) this defined term will also apply to: (1) Incorporated Approved Persons, and (2) employees and shareholders of Incorporated Approved Persons, where the context is appropriate.	No	4.2.2
Rule 1200 - Definitions	Section 1201 - Definitions	1201(2), "securities laws"	1201(2), "securities laws"	No equivalent definition	No equivalent definition	N/A	N/A	Rule 1200 - Definitions	Section 1201 - Definitions	1201(2), "securities laws"	1201(2), "securities laws"	Definition of "securities laws"	No revisions required		N/A	N/A
Rule 1200 - Definitions	Section 1201 - Definitions	1201(2), "securities and derivatives related business"	1201(2), "securities and derivatives related business"	No equivalent definition	No equivalent definition	N/A	N/A	Rule 1200 - Definitions	Section 1201 - Definitions	1201(2), "securities and derivatives related business"	1201(2), "securities and derivatives related business"	Definition of "securities and derivatives related business"	No revisions required		N/A	N/A
No equivalent definition	No equivalent definition	N/A	N/A	Rule 1A - Application, Interpretation, Exemptions, and Definitions	Definitions	Rule 1A, Definitions, "sub-branch"	Rule 1A, Definitions, "sub-branch"	No equivalent definition	No equivalent definition	N/A	1201(2), "sub-branch"	Definition of "sub-branch"	Revise to narrow scope of application of this provision from "Approved Persons" to "individual Approved Persons" so that it does not apply to "Incorporated Approved Persons".	Revise to narrow scope of application of this provision from "Approved Persons" to "individual Approved Persons" so that it does not apply to "Incorporated Approved Persons".	No	4.2.3
Rule 1200 - Definitions	Section 1201 - Definitions	1201(2), "Supervisor"	1201(2), "Supervisor"	No equivalent definition	No equivalent definition	N/A	N/A	Rule 1200 - Definitions	Section 1201 - Definitions	1201(2), "Supervisor"	1201(2), "Supervisor"	Definition of "Supervisor"	Clarification revisions required.		No	N/A
Rule 1200 - Definitions	Section 1201 - Definitions	1201(2), "trade name"	1201(2), "trade name"	No equivalent definition	No equivalent definition	N/A	N/A	Rule 1200 - Definitions	Section 1201 - Definitions	1201(2), "trade name"	1201(2), "trade name"	Definition of "trade name"	No revisions required		N/A	N/A



Appendix 8 - Table of concordance summarizing proposed revisions to IDPC, MFD and CIRO Rules

IDPC Rule	IDPC Rule part and section	Existing IDPC Rule reference	New IDPC Rule reference	MFD Rule	MFD Rule part and section	Existing MFD Rule reference	New MFD Rule reference	CIRO Rule	CIRO Rule part and section	Existing CIRO Rule reference	New CIRO Rule reference	Description	Conclusion	Specific comments	Major revision?	Section within the Rules Bulletin
Rule 1400 - Standards of conduct	Section 1402 - Standards of conduct	1402(1) and 1402(2)	1402(1) and 1402(2)	Rule 2 - Business Conduct	Rule 2.1.1 - Standard of Conduct	Rule 2.1.1	Rule 2.1.1	Rule 1400 - Standards of conduct	Section 1402 - Standards of conduct	1402(1) and 1402(2)	1402(1) and 1402(2)	General standard of conduct applicable to Regulated Persons, in the case of the IDPC Rules, and Members and their Approved Persons, in the case of the MFD Rules	No revisions required	IDPC Rule section 1402 refers to "Regulated Person", which is defined to include "Dealer Members" and "Approved Persons", so when read in combination with IDPCR clause 1102(3)(ii), this defined term will also apply to conduct of (1) Incorporated Approved Persons, and (2) employees and shareholders of Incorporated Approved Persons where the context is appropriate. Rule 2.1.1 refers to "Member" and "Approved Person", which is defined to include Incorporated Approved Persons, so when read in combination with MFD Rule 1A, Application / Interpretation (ii) this defined term will also apply to conduct of: (1) Incorporated Approved Persons, and (2) employees and shareholders of Incorporated Approved Persons where the context is appropriate.	No	4.2.2
Rule 1400 - Standards of conduct	Section 1402 - Standards of conduct	1403(1)(i)	1403(1)(i)	Rule 2 - Business Conduct	Rule 2.1.2 - Member Responsible	Rule 2.1.2	Rule 2.1.2	Rule 1400 - Standards of conduct	Section 1402 - Standards of conduct	1403(1)(i)	1403(1)(i)	Dealer Members to be responsible for the acts and omissions of employees, partners, directors and offices, in the case of the IDPC Rules, and employees, agents and Approved Persons, in the case of the MFD Rules	In order to ensure Dealer Members are held responsible for the acts and omissions of Incorporated Approved Persons, the IDPC Rule versions of this provision needs to be revised to include "Approved Persons".	IDPC Rule provision now refers to "Approved Persons", so when read in combination with IDPCR clause 1102(3)(ii), this defined term will also apply to conduct of (1) Incorporated Approved Persons, and (2) employees and shareholders of Incorporated Approved Persons where the context is appropriate. Rule 2.1.2 refers to "Approved Persons", which is defined to include Incorporated Approved Persons, so when read in combination with MFD Rule 1A, Application / Interpretation (ii) this defined term will also apply to conduct of: (1)	Yes	4.2.3



Appendix 8 - Table of concordance summarizing proposed revisions to IDPC, MFD and CIRO Rules

IDPC Rule	IDPC Rule part and section	Existing IDPC Rule reference	New IDPC Rule reference	MFD Rule	MFD Rule part and section	Existing MFD Rule reference	New MFD Rule reference	CIRO Rule	CIRO Rule part and section	Existing CIRO Rule reference	New CIRO Rule reference	Description	Conclusion	Specific comments	Major revision?	Section within the Rules Bulletin
														Incorporated Approved Persons, and (2) employees and shareholders of Incorporated Approved Persons where the context is appropriate.		
Rule 1400 - Standards of conduct	Section 1403 - Applicability	1403(2)(i)	1403(2)(i)	Rule 1 - Business Structures and Qualifications	Rule 1.1.2 - Compliance by Members and Approved Persons	Rule 1.1.2	Rule 1.1.2	Rule 1400 - Standards of conduct	Section 1403 - Applicability	1403(2)(i)	1403(2)(i)	Obligation to comply with CIRO requirements	No revisions required	IDPC Rule clause refers to "Approved Persons" so when read in combination with IDPCR clause 1102(3)(ii) this requirement will also apply to: (1) Incorporated Approved Persons, and (2) employees and shareholders of Incorporated Approved Persons where the context is appropriate. MFD Rule refers to "Members and Approved Persons" which is defined to include Incorporated Approved Persons so when read in combination with MFD Rule 1A, Application / Interpretation (ii) this requirement will also apply to: (1) Incorporated Approved Persons, and (2) employees and shareholders of Incorporated Approved Persons where the context is appropriate.	No	4.2.2
Rule 1400 - Standards of conduct	Section 1404 - Policies and procedures	1404(2)	1404(2)	Rule 1 - Business Structures and Qualifications	Rule 1.2.1 - Compliance with Corporation Requirements	Rule 1.2.1	Rule 1.2.1	Rule 1400 - Standards of conduct	Section 1404 - Policies and procedures	1404(2)	1404(2)	Obligation to ensure that Approved Persons comply with Corporation requirements	Clarification revisions required.	IDPC Rule subsection and MFD Rule refer to "Approved Person" so pursuant to IDPCR clause 1102(3)(ii) and MFD Rule 1A, Application / Interpretation (ii) will also apply to: (1) Incorporated Approved Persons, and (2) employees and shareholders of Incorporated Approved Persons where the context is appropriate.	No	4.2.2
Rule 2200 - Dealer Member Organization	Part A.2, Section 2206 - Related companies	2206(1)	2206(1)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 2200 - Dealer Member Organization	Part A.2, Section 2206 - Related companies	2206(1)	2206(1)	Requirement to obtain Corporation approval before acquiring an interest in or setting up a related company or associate.	No revisions required		N/A	N/A
Rule 2200 - Dealer Member Organization	Part A.3, Section 2216 - Shared office premises	2216(17)	2216(17)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 2200 - Dealer Member Organization	Part A.3, Section 2216 - Shared office premises	2218(2)	2218(2)	Provision relating to providing assistance to a client applying to open an account	Revise to narrow scope of application of this provision from "Approved Persons" to "individual Approved Persons" so that it does not apply to "Incorporated Approved Persons".	Current wording of IDPC Rule subsection refers to "Approved Person"; scope needs to be narrowed to refer to "individual Approved Persons"	No	4.2.3
Rule 2200 - Dealer Member Organization	Part B, Section 2227 - Payment of Corporation fees	2227(2)(ii)	2227(2)(ii)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 2200 - Dealer Member Organization	Part B, Section 2227 - Payment of Corporation fees	2227(2)(ii)	2227(2)(ii)	Provision relating to the payment of Corporation fees	No revisions required		N/A	N/A
Rule 2200 - Dealer Member	Part E, Section 2281 - Trade	2281(1) through 2281(4)	2281(1) through 2281(4)	Rule 1 - Business Structures	Rule 1.1.7 - Business Names,	Rule 1.1.7	Rule 1.1.7	Rule 2200 - Dealer Member	Part E, Section 2281 - Trade	2281(1) through 2281(5)	2281(1) through 2281(5)	Requirements relating to the use of trade names	Renumbering of MFD Rule required	IDPC Rule subsections 2281(1) through 2281(4) and MFD Rule 1.1.7 refer to	No	4.2.2



Appendix 8 - Table of concordance summarizing proposed revisions to IDPC, MFD and CIRO Rules

IDPC Rule	IDPC Rule part and section	Existing IDPC Rule reference	New IDPC Rule reference	MFD Rule	MFD Rule part and section	Existing MFD Rule reference	New MFD Rule reference	CIRO Rule	CIRO Rule part and section	Existing CIRO Rule reference	New CIRO Rule reference	Description	Conclusion	Specific comments	Major revision?	Section within the Rules Bulletin
Organization	names			and Qualifications	Styles, Etc.			Organization	names					"Approved Person" so pursuant to IDPCR clause 1102(3)(ii) and MFD Rule 1A, Application / Interpretation (ii) will also apply to: (1) Incorporated Approved Persons, and (2) employees and shareholders of Incorporated Approved Persons where the context is appropriate.		
Rule 2200 - Dealer Member Organization	Part E, Section 2282 - Corporation notification	2282(2)	2282(2)	Rule 1 - Business Structures and Qualifications	Rule 1.1.7 - Business Names, Styles, Etc.	Rule 1.1.7	Rule 1.1.7	Rule 2200 - Dealer Member Organization	Part E, Section 2282 - Corporation notification	2282(2)	2282(2)	Requirements relating to the use of trade names	Renumbering of MFD Rule required	IDPC Rule subsection 2282(2) and MFD Rule 1.1.7 refer to "Approved Person" so pursuant to IDPCR clause 1102(3)(ii) and MFD Rule 1A, Application / Interpretation (ii) will also apply to: (1) Incorporated Approved Persons, and (2) employees and shareholders of Incorporated Approved Persons where the context is appropriate.	No	4.2.2
Rule 2200 - Dealer Member Organization	Part E, Section 2283 - Displaying the full legal name	2283(2)	2283(2)	Rule 1 - Business Structures and Qualifications	Rule 1.1.7 - Business Names, Styles, Etc.	Rule 1.1.7	Rule 1.1.7	Rule 2200 - Dealer Member Organization	Part E, Section 2283 - Displaying the full legal name	2283(2)	2283(2)	Requirements relating to the use of trade names	Renumbering of MFD Rule required	IDPC Rule subsection and MFD Rule refer to "Approved Person" so pursuant to IDPCR clause 1102(3)(ii) and MFD Rule 1A, Application / Interpretation (ii) will also apply to: (1) Incorporated Approved Persons, and (2) employees and shareholders of Incorporated Approved Persons where the context is appropriate.	No	4.2.2
Rule 2300 - Principal and Agent Relationships	Rule 2300	2300, Title	2300, Title	No equivalent provision	No equivalent provision	N/A	N/A	Rule 2300 - Principal and Agent Relationships	Rule 2300	2300, Title	2300, Title	Rule title regarding permissible relationships between the firm and the individuals that perform activities for the firm	Revise IDPC Rule title to "Relationships between Dealer Members and their agent" as rules are no longer limited to principal and agent relationships.	Clarification revision	No	4.2.3
Rule 2300 - Principal and Agent Relationships	Section 2301 - Introduction	2301(1)	2301(1)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 2300 - Principal and Agent Relationships	Section 2301 - Introduction	2301(1)	2301(1)	Introduction subsection	No revisions required		N/A	N/A
Rule 2300 - Principal and Agent Relationships	Section 2302 - Permissible relationships	2302(1)	2302(1)	Rule 1 - Business Structures and Qualifications	Rule 1.1.1	Rule 1.1.1(c)(i)	Rule 1.1.1(c)(i)	Rule 2300 - Principal and Agent Relationships	Section 2302 - Permissible relationships	2302(1)	2302(1)	Subsection/Rule permitting the use of an employer and employee relationship	No revisions required		N/A	N/A
Rule 2300 - Principal and Agent Relationships	Section 2302 - Permissible relationships	2302(1)	2302(1)	Rule 1 - Business Structures and Qualifications	Rule 1.1.1	Rule 1.1.1(c)(ii)	Rule 1.1.1(c)(ii)	Rule 2300 - Principal and Agent Relationships	Section 2302 - Permissible relationships	2302(1)	2302(1)	Subsection/Rule permitting the use of a principal and agent relationship	No revisions required		N/A	N/A
No equivalent provision	No equivalent provision	N/A	2302(2)	No equivalent provision	No equivalent provision	N/A	Rule 1.1.1(c)(iii)	No equivalent provision	No equivalent provision	N/A	2302(2)	Subsection and rule permitting payments to personal corporation under an incorporated advisor arrangement	Introduce new IDPC Rule subsection and MFD Rule to permit incorporated agent relationships		Yes	4.2.1
Rule 2300 - Principal and	Section 2302 - Permissible	2302, Title	2302, Title	No equivalent provision	No equivalent provision	N/A	N/A	Rule 2300 - Principal and	Section 2302 - Permissible	2302, Title	2302, Title	IDPC Rule section title regarding permissible	Revise IDPC Rule section title as rules are no longer limited	Clarification revision	No	4.2.3



Appendix 8 - Table of concordance summarizing proposed revisions to IDPC, MFD and CIRO Rules

IDPC Rule	IDPC Rule part and section	Existing IDPC Rule reference	New IDPC Rule reference	MFD Rule	MFD Rule part and section	Existing MFD Rule reference	New MFD Rule reference	CIRO Rule	CIRO Rule part and section	Existing CIRO Rule reference	New CIRO Rule reference	Description	Conclusion	Specific comments	Major revision?	Section within the Rules Bulletin
Agent Relationships	relationships							Agent Relationships	relationships			relationships between the firm and the individuals that perform activities for the firm	to principal and agent relationships.			
Rule 2300 - Principal and Agent Relationships	Section 2303 - Written agreement that must be executed between the Dealer Member and the Corporation	2303(1)	2303(1)	No equivalent provision	No equivalent provision	N/A	Rule 1.1.5(c)(i)	Rule 2300 - Principal and Agent Relationships	Section 2303 - Written agreement that must be executed between the Dealer Member and the Corporation	2303(1)	2303(1)	IDPC Rule subsection and MFD Rule set out requirements for entering into a principal and agent relationship agreement between the dealer and the Corporation	Harmonized drafting language used within IDPC and MFD Rules.	Revisions are required to harmonize existing principal and agent relationship requirements for investment dealers and mutual fund dealers	Yes	4.2.1
Rule 2300 - Principal and Agent Relationships	Section 2303 - Written agreement that must be executed between the Dealer Member and the Corporation	2303(2)	2303(2)	No equivalent provision	No equivalent provision	N/A	Rule 1.1.5(c)(ii)	Rule 2300 - Principal and Agent Relationships	Section 2303 - Written agreement that must be executed between the Dealer Member and the Corporation	2303(2)	2303(2)	IDPC Rule subsection and MFD Rule set out requirements for entering into a principal and agent relationship agreement between the dealer and the Corporation	Harmonized drafting language used within IDPC and MFD Rules.	Revisions are required to harmonize existing principal and agent relationship requirements for investment dealers and mutual fund dealers	Yes	4.2.1
Rule 2300 - Principal and Agent Relationships	Section 2303 - Written agreement that must be executed between the Dealer Member and the Corporation	2303(3)	2303(3)	No equivalent provision	No equivalent provision	N/A	Rule 1.1.5(c)(iii)	Rule 2300 - Principal and Agent Relationships	Section 2303 - Written agreement that must be executed between the Dealer Member and the Corporation	2303(3)	2303(3)	IDPC Rule subsection and MFD Rule set out requirements for entering into a principal and agent relationship agreement between the dealer and the Corporation	Harmonized drafting language used within IDPC and MFD Rules.	Revisions are required to harmonize existing principal and agent relationship requirements for investment dealers and mutual fund dealers	Yes	4.2.1
Rule 2300 - Principal and Agent Relationships	Section 2303 - Written agreement that must be executed between the Dealer Member and the Corporation	2303(4), Agreement Item 2, Agreement with the Agent	2303(4), Agreement Item 2, Agreement with the Agent	No equivalent provision	No equivalent provision	N/A	Rule 1.1.5(c)(iv), Agreement Item 2, Agreement with the Agent	Rule 2300 - Principal and Agent Relationships	Section 2303 - Written agreement that must be executed between the Dealer Member and the Corporation	2303(4), Agreement Item 2, Agreement with the Agent	2303(4), Agreement Item 2, Agreement with the Agent	IDPC Rule subsection and MFD Rule set out requirements for entering into a principal and agent relationship agreement between the dealer and the Corporation	Harmonized drafting language used within IDPC and MFD Rules.	Revisions are required to harmonize existing principal and agent relationship requirements for investment dealers and mutual fund dealers	Yes	4.2.1
Rule 2300 - Principal and Agent Relationships	Section 2303 - Written agreement that must be executed between the Dealer Member and the Corporation	2303(4), Agreement Item 3, Supervision of the Agent	2303(4), Agreement Item 3, Supervision of the Agent	No equivalent provision	No equivalent provision	N/A	Rule 1.1.5(c)(iv), Agreement Item 3, Supervision of the Agent	Rule 2300 - Principal and Agent Relationships	Section 2303 - Written agreement that must be executed between the Dealer Member and the Corporation	2303(4), Agreement Item 3, Supervision of the Agent	2303(4), Agreement Item 3, Supervision of the Agent	IDPC Rule subsection and MFD Rule set out requirements for entering into a principal and agent relationship agreement between the dealer and the Corporation	Harmonized drafting language used within IDPC and MFD Rules.	Revisions are required to harmonize existing principal and agent relationship requirements for investment dealers and mutual fund dealers	Yes	4.2.1
Rule 2300 - Principal and Agent Relationships	Section 2303 - Written agreement that must be executed between the Dealer Member and the Corporation	2303(4), Agreement Item 5, Disclosure to clients	2303(4), Agreement Item 5, Disclosure to clients	No equivalent provision	No equivalent provision	N/A	Rule 1.1.5(c)(iv), Agreement Item 5, Disclosure to clients	Rule 2300 - Principal and Agent Relationships	Section 2303 - Written agreement that must be executed between the Dealer Member and the Corporation	2303(4), Agreement Item 5, Disclosure to clients	2303(4), Agreement Item 5, Disclosure to clients	IDPC Rule subsection and MFD Rule set out requirements for entering into a principal and agent relationship agreement between the dealer and the Corporation	Harmonized drafting language used within IDPC and MFD Rules.	Revisions are required to harmonize existing principal and agent relationship requirements for investment dealers and mutual fund dealers	Yes	4.2.1



Appendix 8 - Table of concordance summarizing proposed revisions to IDPC, MFD and CIRO Rules

IDPC Rule	IDPC Rule part and section	Existing IDPC Rule reference	New IDPC Rule reference	MFD Rule	MFD Rule part and section	Existing MFD Rule reference	New MFD Rule reference	CIRO Rule	CIRO Rule part and section	Existing CIRO Rule reference	New CIRO Rule reference	Description	Conclusion	Specific comments	Major revision?	Section within the Rules Bulletin
	Corporation								Corporation							
Rule 2300 - Principal and Agent Relationships	Section 2303 - Written agreement that must be executed between the Dealer Member and the Corporation	2303(4), Agreement Item 7, Regulatory Authority of the Corporation	2303(4), Agreement Item 7, Regulatory Authority of the Corporation	No equivalent provision	No equivalent provision	N/A	Rule 1.1.5(c)(iv), Agreement Item 7, Regulatory Authority of the Corporation	Rule 2300 - Principal and Agent Relationships	Section 2303 - Written agreement that must be executed between the Dealer Member and the Corporation	2303(4), Agreement Item 7, Regulatory Authority of the Corporation	2303(4), Agreement Item 7, Regulatory Authority of the Corporation	IDPC Rule subsection and MFD Rule set out requirements for entering into a principal and agent relationship agreement between the dealer and the Corporation	Harmonized drafting language used within IDPC and MFD Rules.	Revisions are required to harmonize existing principal and agent relationship requirements for investment dealers and mutual fund dealers	Yes	4.2.1
Rule 2300 - Principal and Agent Relationships	Section 2304 - Written agreement between the Dealer Member and its agents	2304(1)	2304(1)	Rule 1 - Business Structures and Qualifications	Rule 1.1.5 - Agents	Rule 1.1.5(k)	Rule 1.1.5(d)(i)	Rule 2300 - Principal and Agent Relationships	Section 2304 - Written agreement between the Dealer Member and its agents	2304(1)	2304(1)	IDPC Rule subsection and MFD Rule set out requirements for entering into a principal and agent relationship agreement between the dealer and the agent	Harmonized drafting language used within IDPC and MFD Rules.	Revisions are required to harmonize existing principal and agent relationship requirements for investment dealers and mutual fund dealers	Yes	4.2.1
Rule 2300 - Principal and Agent Relationships	Section 2304 - Written agreement between the Dealer Member and its agents	2304(2)	2304(2)	No equivalent provision	No equivalent provision	N/A	Rule 1.1.5(d)(ii)	Rule 2300 - Principal and Agent Relationships	Section 2304 - Written agreement between the Dealer Member and its agents	2304(2)	2304(2)	IDPC Rule subsection and MFD Rule set out requirements for entering into a principal and agent relationship agreement between the dealer and the agent	Harmonized drafting language used within IDPC and MFD Rules.	Revisions are required to harmonize existing principal and agent relationship requirements for investment dealers and mutual fund dealers	Yes	4.2.1
Rule 2300 - Principal and Agent Relationships	Section 2304 - Written agreement between the Dealer Member and its agents	2304(3)	2304(3)	No equivalent provision	No equivalent provision	N/A	Rule 1.1.5(d)(iii)	Rule 2300 - Principal and Agent Relationships	Section 2304 - Written agreement between the Dealer Member and its agents	2304(3)	2304(3)	IDPC Rule subsection and MFD Rule set out requirements for entering into a principal and agent relationship agreement between the dealer and the agent	Harmonized drafting language used within IDPC and MFD Rules.	Revisions are required to harmonize existing principal and agent relationship requirements for investment dealers and mutual fund dealers	Yes	4.2.1
Rule 2300 - Principal and Agent Relationships	Section 2304 - Written agreement between the Dealer Member and its agents	2304(4)	2304(4)	No equivalent provision	No equivalent provision	N/A	Rule 1.1.5(d)(iv)	Rule 2300 - Principal and Agent Relationships	Section 2304 - Written agreement between the Dealer Member and its agents	2304(4)	2304(4)	IDPC Rule subsection and MFD Rule set out requirements for entering into a principal and agent relationship agreement between the dealer and the agent	Harmonized drafting language used within IDPC and MFD Rules.	Revisions are required to harmonize existing principal and agent relationship requirements for investment dealers and mutual fund dealers	Yes	4.2.1
Rule 2300 - Principal and Agent Relationships	Section 2304 - Written agreement between the Dealer Member and its agents	2304(5)	2304(5)	No equivalent provision	No equivalent provision	N/A	Rule 1.1.5(d)(v)	Rule 2300 - Principal and Agent Relationships	Section 2304 - Written agreement between the Dealer Member and its agents	2304(5)	2304(5)	IDPC Rule subsection and MFD Rule set out requirements for entering into a principal and agent relationship agreement between the dealer and the agent	Harmonized drafting language used within IDPC and MFD Rules.	Revisions are required to harmonize existing principal and agent relationship requirements for investment dealers and mutual fund dealers	Yes	4.2.1
Rule 2300 - Principal and Agent Relationships	Section 2304 - Written agreement between the Dealer Member and its agents	2304(6)	N/A	No equivalent provision	No equivalent provision	N/A	N/A	Rule 2300 - Principal and Agent Relationships	Section 2304 - Written agreement between the Dealer Member and its agents	2304(6)	N/A	IDPC Rule subsection and MFD Rule set out requirements for entering into a principal and agent relationship agreement between the dealer and the agent	Harmonized drafting language used within IDPC and MFD Rules.	Revisions are required to harmonize existing principal and agent relationship requirements for investment dealers and mutual fund dealers	Yes	4.2.1
Rule 2300 - Principal and Agent Relationships	Section 2304 - Written agreement between the Dealer Member and its agents	2304(6)	N/A	No equivalent provision	No equivalent provision	N/A	N/A	Rule 2300 - Principal and Agent Relationships	Section 2304 - Written agreement between the Dealer Member and its agents	2304(6)	N/A	IDPC Rule subsection and MFD Rule set out requirements for entering into a principal and agent relationship agreement between the dealer and the agent	Harmonized drafting language used within IDPC and MFD Rules.	Revisions are required to harmonize existing principal and agent relationship requirements for investment dealers and mutual fund dealers	Yes	4.2.1
Rule 2300 - Principal and Agent Relationships	Section 2304 - Written agreement between the Dealer Member and its agents	2304(7), Agreement Item (i),	2304(6), Agreement Item (i),	Rule 1 - Business Structures	Rule 1.1.5 - Agents	Rule 1.1.5(b) and 1.1.5(d)	Rule 1.1.5(d)(vi), Agreement	Rule 2300 - Principal and Agent Relationships	Section 2304 - Written agreement between the Dealer Member and its agents	2304(7), Agreement Item (i),	2304(6), Agreement Item (i),	IDPC Rule subsection and MFD Rule set out requirements for entering into a principal and agent relationship agreement between the dealer and the agent	Harmonized drafting language used within IDPC and MFD Rules.	Revisions are required to harmonize existing principal and agent relationship requirements for investment dealers and mutual fund dealers	Yes	4.2.1



Appendix 8 - Table of concordance summarizing proposed revisions to IDPC, MFD and CIRO Rules

IDPC Rule	IDPC Rule part and section	Existing IDPC Rule reference	New IDPC Rule reference	MFD Rule	MFD Rule part and section	Existing MFD Rule reference	New MFD Rule reference	CIRO Rule	CIRO Rule part and section	Existing CIRO Rule reference	New CIRO Rule reference	Description	Conclusion	Specific comments	Major revision?	Section within the Rules Bulletin
Relationships	between the Dealer Member and its agents	Compliance with applicable laws	Compliance with applicable laws	and Qualifications			Item (A), Compliance with applicable laws	Relationships	between the Dealer Member and its agents	Compliance with applicable laws	Compliance with applicable laws	into a principal and agent relationship agreement between the dealer and the agent		requirements for investment dealers and mutual fund dealers		
Rule 2300 - Principal and Agent Relationships	Section 2304 - Written agreement between the Dealer Member and its agents	2304(7), Agreement Item (ii), Confirmation of supremacy of Corporation requirements	2304(6), Agreement Item (ii), Confirmation of supremacy of Corporation requirements	Rule 1 - Business Structures and Qualifications	Rule 1.1.5 - Agents	Rule 1.1.5(j)	Rule 1.1.5(d)(vi), Agreement Item (B), Confirmation of supremacy of Corporation requirements	Rule 2300 - Principal and Agent Relationships	Section 2304 - Written agreement between the Dealer Member and its agents	2304(7), Agreement Item (ii), Confirmation of supremacy of Corporation requirements	2304(6), Agreement Item (ii), Confirmation of supremacy of Corporation requirements	IDPC Rule subsection and MFD Rule set out requirements for entering into a principal and agent relationship agreement between the dealer and the agent	Harmonized drafting language used within IDPC and MFD Rules.	Revisions are required to harmonize existing principal and agent relationship requirements for investment dealers and mutual fund dealers	Yes	4.2.1
Rule 2300 - Principal and Agent Relationships	Section 2304 - Written agreement between the Dealer Member and its agents	2304(7), Agreement Item (iii), Compliance by the agent with applicable laws	2304(6), Agreement Item (iii), Compliance by the agent with applicable laws	Rule 1 - Business Structures and Qualifications	Rule 1.1.5 - Agents	Rule 1.1.5(d)	Rule 1.1.5(d)(vi), Agreement Item (C), Compliance by the agent with applicable laws	Rule 2300 - Principal and Agent Relationships	Section 2304 - Written agreement between the Dealer Member and its agents	2304(7), Agreement Item (iii), Compliance by the agent with applicable laws	2304(6), Agreement Item (iii), Compliance by the agent with applicable laws	IDPC Rule subsection and MFD Rule set out requirements for entering into a principal and agent relationship agreement between the dealer and the agent	Harmonized drafting language used within IDPC and MFD Rules.	Revisions are required to harmonize existing principal and agent relationship requirements for investment dealers and mutual fund dealers	Yes	4.2.1
Rule 2300 - Principal and Agent Relationships	Section 2304 - Written agreement between the Dealer Member and its agents	2304(7), Agreement Item (iv), Conduct of the agent's business	2304(6), Agreement Item (iv), Conduct of the agent's business	Rule 1 - Business Structures and Qualifications	Rule 1.1.5 - Agents	Rule 1.1.5(g) and 1.1.5(h)	Rule 1.1.5(d)(vi), Agreement Item (D), Conduct of the agent's business	Rule 2300 - Principal and Agent Relationships	Section 2304 - Written agreement between the Dealer Member and its agents	2304(7), Agreement Item (iv), Conduct of the agent's business	2304(6), Agreement Item (iv), Conduct of the agent's business	IDPC Rule subsection and MFD Rule set out requirements for entering into a principal and agent relationship agreement between the dealer and the agent	Harmonized drafting language used within IDPC and MFD Rules.	Revisions are required to harmonize existing principal and agent relationship requirements for investment dealers and mutual fund dealers	Yes	4.2.1
Rule 2300 - Principal and Agent Relationships	Section 2304 - Written agreement between the Dealer Member and its agents	2304(7), Agreement Item (ix), Access to premises	2304(6), Agreement Item (ix), Access to premises	Rule 1 - Business Structures and Qualifications	Rule 1.1.5 - Agents	Rule 1.1.5(f)	Rule 1.1.5(d)(vi), Agreement Item (I), Access to premises	Rule 2300 - Principal and Agent Relationships	Section 2304 - Written agreement between the Dealer Member and its agents	2304(7), Agreement Item (ix), Access to premises	2304(6), Agreement Item (ix), Access to premises	IDPC Rule subsection and MFD Rule set out requirements for entering into a principal and agent relationship agreement between the dealer and the agent	Harmonized drafting language used within IDPC and MFD Rules.	Revisions are required to harmonize existing principal and agent relationship requirements for investment dealers and mutual fund dealers	Yes	4.2.1
Rule 2300 - Principal and Agent Relationships	Section 2304 - Written agreement between the Dealer Member and its agents	2304(7), Agreement Item (v), Supervision of the agent by the Dealer Member	2304(6), Agreement Item (v), Supervision of the agent by the Dealer Member	Rule 1 - Business Structures and Qualifications	Rule 1.1.5 - Agents	Rule 1.1.5(b)	Rule 1.1.5(d)(vi), Agreement Item (E), Supervision of the agent by the Dealer Member	Rule 2300 - Principal and Agent Relationships	Section 2304 - Written agreement between the Dealer Member and its agents	2304(7), Agreement Item (v), Supervision of the agent by the Dealer Member	2304(6), Agreement Item (v), Supervision of the agent by the Dealer Member	IDPC Rule subsection and MFD Rule set out requirements for entering into a principal and agent relationship agreement between the dealer and the agent	Harmonized drafting language used within IDPC and MFD Rules.	Revisions are required to harmonize existing principal and agent relationship requirements for investment dealers and mutual fund dealers	Yes	4.2.1
Rule 2300 - Principal and Agent Relationships	Section 2304 - Written agreement between the Dealer Member and its agents	2304(7), Agreement Item (vi), Written disclosure to clients	2304(6), Agreement Item (vi), Written disclosure to clients	No equivalent provision	No equivalent provision	N/A	Rule 1.1.5(d)(vi), Agreement Item (F), Written disclosure to clients	Rule 2300 - Principal and Agent Relationships	Section 2304 - Written agreement between the Dealer Member and its agents	2304(7), Agreement Item (vi), Written disclosure to clients	2304(6), Agreement Item (vi), Written disclosure to clients	IDPC Rule subsection and MFD Rule set out requirements for entering into a principal and agent relationship agreement between the dealer and the agent	Harmonized drafting language used within IDPC and MFD Rules.	Revisions are required to harmonize existing principal and agent relationship requirements for investment dealers and mutual fund dealers	Yes	4.2.1
Rule 2300 - Principal and Agent Relationships	Section 2304 - Written agreement between the Dealer Member and its agents	2304(7), Agreement Item (vii), Dealer Member assumes responsibilities for clients	2304(6), Agreement Item (vii), Dealer Member assumes responsibilities for clients	No equivalent provision	No equivalent provision	N/A	Rule 1.1.5(d)(vi), Agreement Item (G), Dealer Member assumes responsibilities for clients	Rule 2300 - Principal and Agent Relationships	Section 2304 - Written agreement between the Dealer Member and its agents	2304(7), Agreement Item (vii), Dealer Member assumes responsibilities for clients	2304(6), Agreement Item (vii), Dealer Member assumes responsibilities for clients	IDPC Rule subsection and MFD Rule set out requirements for entering into a principal and agent relationship agreement between the dealer and the agent	Harmonized drafting language used within IDPC and MFD Rules.	Revisions are required to harmonize existing principal and agent relationship requirements for investment dealers and mutual fund dealers	Yes	4.2.1
Rule 2300 - Principal and Agent Relationships	Section 2304 - Written agreement between the Dealer Member and its agents	2304(7), Agreement	2304(6), Agreement	Rule 1 - Business Structures and Qualifications	Rule 1.1.5 - Agents	Rule 1.1.5(i) and 1.1.5(j)	Rule 1.1.5(d)(vi),	Rule 2300 - Principal and Agent Relationships	Section 2304 - Written agreement between the Dealer Member and its agents	2304(7), Agreement	2304(6), Agreement	IDPC Rule subsection and MFD Rule set out	Harmonized drafting language used within IDPC	Revisions are required to harmonize existing principal	Yes	4.2.1



Appendix 8 - Table of concordance summarizing proposed revisions to IDPC, MFD and CIRO Rules

IDPC Rule	IDPC Rule part and section	Existing IDPC Rule reference	New IDPC Rule reference	MFD Rule	MFD Rule part and section	Existing MFD Rule reference	New MFD Rule reference	CIRO Rule	CIRO Rule part and section	Existing CIRO Rule reference	New CIRO Rule reference	Description	Conclusion	Specific comments	Major revision?	Section within the Rules Bulletin
Agent Relationships	agreement between the Dealer Member and its agents	Item (viii), Outside activities	Item (viii), Outside activities	Structures and Qualifications			Agreement Item (H), Outside activities	Agent Relationships	agreement between the Dealer Member and its agents	Item (viii), Outside activities	Item (viii), Outside activities	requirements for entering into a principal and agent relationship agreement between the dealer and the agent	and MFD Rules.	and agent relationship requirements for investment dealers and mutual fund dealers		
Rule 2300 - Principal and Agent Relationships	Section 2304 - Written agreement between the Dealer Member and its agents	2304(7), Agreement Item (x), Records	2304(6), Agreement Item (x), Records	Rule 1 - Business Structures and Qualifications	Rule 1.1.5 - Agents	Rule 1.1.5(f)	Rule 1.1.5(d)(vi), Agreement Item (J), Records	Rule 2300 - Principal and Agent Relationships	Section 2304 - Written agreement between the Dealer Member and its agents	2304(7), Agreement Records	2304(6), Agreement Item (x), Records	IDPC Rule subsection and MFD Rule set out requirements for entering into a principal and agent relationship agreement between the dealer and the agent	Harmonized drafting language used within IDPC and MFD Rules.	Revisions are required to harmonize existing principal and agent relationship requirements for investment dealers and mutual fund dealers	Yes	4.2.1
Rule 2300 - Principal and Agent Relationships	Section 2304 - Written agreement between the Dealer Member and its agents	2304(7), Agreement Item (xi), Insurance	2304(6), Agreement Item (xi), Insurance	Rule 1 - Business Structures and Qualifications	Rule 1.1.5 - Agents	Rule 1.1.5(e)	Rule 1.1.5(d)(vi), Agreement Item (K), Insurance	Rule 2300 - Principal and Agent Relationships	Section 2304 - Written agreement between the Dealer Member and its agents	2304(7), Agreement Item (xi), Insurance	2304(6), Agreement Item (xi), Insurance	IDPC Rule subsection and MFD Rule set out requirements for entering into a principal and agent relationship agreement between the dealer and the agent	Harmonized drafting language used within IDPC and MFD Rules.	Revisions are required to harmonize existing principal and agent relationship requirements for investment dealers and mutual fund dealers	Yes	4.2.1
Rule 2300 - Principal and Agent Relationships	Section 2304 - Written agreement between the Dealer Member and its agents	2304(7), Agreement Item (xii), Assignment of agreement	2304(6), Agreement Item (xii), Assignment of agreement	No equivalent provision	No equivalent provision	N/A	Rule 1.1.5(d)(vi), Agreement Item (L)	Rule 2300 - Principal and Agent Relationships	Section 2304 - Written agreement between the Dealer Member and its agents	2304(7), Agreement Item (xii), Assignment of agreement	2304(6), Agreement Item (xii), Assignment of agreement	IDPC Rule subsection and MFD Rule set out requirements for entering into a principal and agent relationship agreement between the dealer and the agent	Harmonized drafting language used within IDPC and MFD Rules.	Revisions are required to harmonize existing principal and agent relationship requirements for investment dealers and mutual fund dealers	Yes	4.2.1
No equivalent provision	No equivalent provision	N/A	2305(1) through 2305(7)	No equivalent provision	No equivalent provision	N/A	Rule 1.1.5(e)(i) through 1.1.5(e)(vii)	No equivalent provision	No equivalent provision	N/A	2305(1) through 2305(7)	IDPC Rule section and MFD Rule set out requirements for entering into an incorporated agent relationship agreement between the dealer, the agent and the agent's personal corporation	Add new IDPC Rule section and MFD Rule to specify the requirements a personal corporation must meet to be approved as an "Incorporated Approved Person".	New proposed incorporated agent relationship requirements	Yes	4.2.1
No equivalent provision	No equivalent provision	N/A	N/A	No equivalent provision	No equivalent provision	N/A	N/A	Rule 2400 - Acceptable Back Office and Service Arrangements	Section 2401 - Introduction	2401(2)	2401(2)	Inclusion of reference to new Part E for services arrangements		Clarification revision	No	4.2.3
No equivalent provision	No equivalent provision	N/A	N/A	Rule 1 - Business Structures and Qualifications	Rule 1.1.3 - Service Arrangements	Rule 1.1.3	Rule 1.1.3	Rule 2400 - Acceptable Back Office and Service Arrangements	Section 2490 - Acceptable service arrangements	2490(1) through 2490(4)	2490(1) through 2490(4)	New section for service arrangements	No revisions required		N/A	N/A
Rule 2500 - Dealer Member Directors and Executives, approval of individuals and non-individuals	Rule 2500, rule title	2500, rule title	2500, rule title	No equivalent provision	No equivalent provision	N/A	N/A	Rule 2500 - Dealer Member Directors and Executives, approval of individuals and non-individuals	Rule 2500, rule title	2500, rule title	2500, rule title	Rule title for requirements regarding individual and non-individual approvals	Revise Rule title as rules now include provisions relating to the approval of non-individuals.	Clarification revision	No	4.2.3
Rule 2500 - Dealer Member Directors and Executives, approval of individuals and non-individuals	Section 2501 - Introduction	2501(2)	2501(2)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 2500 - Dealer Member Directors and Executives, approval of individuals and non-individuals	Section 2501 - Introduction	2501(2)	2501(2)	Introduction subsection	Part C is being added to Rule 2500 to set out requirements relating to the approval of <i>non-individual Approved Persons</i> .	New or clarified introduction language	No	4.2.3



Appendix 8 - Table of concordance summarizing proposed revisions to IDPC, MFD and CIRO Rules

IDPC Rule	IDPC Rule part and section	Existing IDPC Rule reference	New IDPC Rule reference	MFD Rule	MFD Rule part and section	Existing MFD Rule reference	New MFD Rule reference	CIRO Rule	CIRO Rule part and section	Existing CIRO Rule reference	New CIRO Rule reference	Description	Conclusion	Specific comments	Major revision?	Section within the Rules Bulletin
Rule 2500 - Dealer Member Directors and Executives, approval of individuals and non-individuals	Part B, Section 2550 - Introduction	2550(1)	2550(1)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 2500 - Dealer Member Directors and Executives, approval of individuals and non-individuals	Part B, Section 2550 - Introduction	2550(1)	2550(1)	Introduction subsection	Revise language from "Approved Persons" to "individual Approved Persons" so that it does not capture "Incorporated Approved Persons".	New or clarified introduction language	No	4.2.3
Rule 2500 - Dealer Member Directors and Executives, approval of individuals and non-individuals	Part B, Section 2551 - Individual approval	2551(1) through 2551(6)	2551(1) through 2551(6)	Rule 2 - Business Conduct	Rules 1.2.2 and 1.2.3	Rule 1.2.2 and 1.2.3	Rule 1.2.2 and 1.2.3	Rule 2500 - Dealer Member Directors and Executives, approval of individuals and non-individuals	Part B, Section 2551 - Individual approval	2551(1) through 2551(6)	2551(1) through 2551(6)	Approval requirements and processes for individuals	Revise to narrow scope of application of this provision from "Approved Persons" to "individual Approved Persons" so that it does not apply to "Incorporated Approved Persons".	Current wording of IDPC Rule subsections and MFD Rules refer to "Approved Person"; scope needs to be narrowed to refer to "individual Approved Persons"	No	4.2.3
Rule 2500 - Dealer Member Directors and Executives, approval of individuals and non-individuals	Part B, Section 2551 - Individual approval	2551(7)	2551(7)	Rule 2 - Business Conduct	Rule 2.4 - Remuneration, Commissions and Fees	Rule 2.4.1(a)	Rule 2.4.1(a)	Rule 2500 - Dealer Member Directors and Executives, approval of individuals and non-individuals	Part B, Section 2551 - Individual approval	2551(7)	2551(7)	Approval requirements and processes for individuals. Specific provisions set out compensation arrangement requirements for individual Approved Persons.	Revise to narrow scope of application of this provision from "Approved Persons" to "individual Approved Persons" so that it does not apply to "Incorporated Approved Persons".	Revised individual compensation requirements	Yes	4.2.1
Rule 2500 - Dealer Member Directors and Executives, approval of individuals and non-individuals	Part B, Section 2551 - Individual approval	2551(8) and 2551(9)	2551(8) and 2551(9)	Rule 2 - Business Conduct	Rule 2.4 - Remuneration, Commissions and Fees	Rule 2.4.1(b) and 2.4.1(c)	Rule 2.4.1(b) and 2.4.1(c)	Rule 2500 - Dealer Member Directors and Executives, approval of individuals and non-individuals	Part B, Section 2551 - Individual approval	2303(3) and 2303(4)	2551(9) and 2551(10)	Approval requirements and processes for individuals. Specific provisions set out an exception for certain arrangements.	Expand compensation option to refer to scope of individuals that may qualify for the incorporated advisor approach as set out in IDPC Rule section 2305 and MFD Rule 1.1.6	Revised individual compensation requirement exception	Yes	4.2.1
Rule 2500 - Dealer Member Directors and Executives, approval of individuals and non-individuals	Part B, Section 2552 - Compliance with the proficiency requirements or other conditions	2552(1) through 2552(4)	2552(1) through 2552(4)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 2500 - Dealer Member Directors and Executives, approval of individuals and non-individuals	Part B, Section 2552 - Compliance with the proficiency requirements or other conditions	2552(1) through 2552(4)	2552(1) through 2552(4)	Approval requirements and processes for individuals.	Revise to narrow scope of application of this provision from "Approved Persons" to "individual Approved Persons" so that it does not apply to "Incorporated Approved Persons".	Current wording of IDPC Rule subsection refers to "Approved Person"; scope needs to be narrowed to refer to "individual Approved Persons"	No	4.2.3
Rule 2500 - Dealer Member Directors and Executives, approval of individuals and non-individuals	Part B, Section 2553 - Approval of Registered Representatives, Investment Representatives, Portfolio Managers and Associate Portfolio Managers and their obligations	2553(3)	2553(3)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 2500 - Dealer Member Directors and Executives, approval of individuals and non-individuals	Part B, Section 2553 - Approval of Registered Representatives, Investment Representatives, Portfolio Managers and Associate Portfolio Managers and their obligations	2553(3)	2553(3)	Approval requirements and processes for individuals.	Revise to narrow scope of application of this provision from "Approved Persons" to "individual Approved Persons" so that it does not apply to "Incorporated Approved Persons".	Current wording of IDPC Rule subsection refers to "Approved Person"; scope needs to be narrowed to refer to "individual Approved Persons"	No	4.2.3
Rule 2500 - Dealer	Part B, Section 2554	2554(1)	2554(1)	Rule 1 - Business	Rule 1.3.2 - Requirements	Rule 1.3.2	Rule 1.3.2	Rule 2500 - Dealer	Part B, Section 2554	2554(1)	2554(1)	Approval requirements and processes for individuals.	Revise to narrow scope of application of this provision	Current wording of IDPC Rule subsections and MFD Rules	No	4.2.3



Appendix 8 - Table of concordance summarizing proposed revisions to IDPC, MFD and CIRO Rules

IDPC Rule	IDPC Rule part and section	Existing IDPC Rule reference	New IDPC Rule reference	MFD Rule	MFD Rule part and section	Existing MFD Rule reference	New MFD Rule reference	CIRO Rule	CIRO Rule part and section	Existing CIRO Rule reference	New CIRO Rule reference	Description	Conclusion	Specific comments	Major revision?	Section within the Rules Bulletin
Member Directors and Executives, approval of individuals and non-individuals	- Individual Approved Person activities outside of the Dealer Member			Structures and Qualifications	for Outside Activity			Member Directors and Executives, approval of individuals and non-individuals	- Individual Approved Person activities outside of the Dealer Member			Specific provisions set out the requirements that must be met to engage in an outside activity	from "Approved Persons" to "individual Approved Persons" so that it does not apply to "Incorporated Approved Persons".	refer to "Approved Person"; scope needs to be narrowed to refer to "individual Approved Persons"		
No equivalent provision	No equivalent provision	N/A	2555(1)	No equivalent provision	No equivalent provision	N/A	Rule 1.3.3	No equivalent provision	No equivalent provision	N/A	2555(1)	New IDPC Rule sections and MFD Rules set out approval requirements and processes for non-individuals	Introduce new IDPC Rule and MFD Rule requirements to specify the approval conditions for activities other than those performed on the sponsoring dealer's behalf.	New provisions are required to set out approval requirements and processes for non-individual Approved Persons	Yes	4.2.1
Rule 2500 - Dealer Member Directors and Executives, approval of individuals and non-individuals	Part C, Section 2560 - Introduction	2560(1)	2560(1)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 2500 - Dealer Member Directors and Executives, approval of individuals and non-individuals	Part C, Section 2560 - Introduction	2560(1)	2560(1)	Introduction subsection	Introduce new Part C to Rule 2500 to set out approval requirements and process for non-individual <i>Approved Persons</i> .	New or clarified introduction language	No	4.2.3
No equivalent provision	No equivalent provision	N/A	2561(1) through 2561(6)	No equivalent provision	No equivalent provision	N/A	Rule 1.5.1(a) through 1.5.1(f)	No equivalent provision	No equivalent provision	N/A	2561(1) through 2561(6)	New IDPC Rule sections and MFD Rules set out approval requirements and processes for non-individuals	Introduce new IDPC Rule and MFD Rule requirements to specify the approval conditions and processes for non-individual "Approved Persons".	New provisions are required to set out approval requirements and processes for non-individual Approved Persons	Yes	4.2.1
Rule 2600 - Proficiency requirements and exemptions from proficiencies	Section 2601 - Introduction	2601(1)	2601(1)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 2600 - Proficiency requirements and exemptions from proficiencies	Section 2601 - Introduction	2601(1)	2601(1)	Introduction subsection	Revise language from "Approved Persons" to "individual Approved Persons" so that it does not capture "Incorporated Approved Persons".	New or clarified introduction language	No	4.2.3
Rule 2600 - Proficiency requirements and exemptions from proficiencies	Part A, Section 2602 - Proficiency requirements for individual Approved Persons and approved investors	2602(1) and 2602(3)	2602(1) and 2602(3)	Rule 1 - Business Structures and Qualifications	Rule 1.2.2 - Registration	Rule 1.2.2	Rule 1.2.2	Rule 2600 - Proficiency requirements and exemptions from proficiencies	Part A, Section 2602 - Proficiency requirements for individual Approved Persons and approved investors	2602(1) and 2602(3)	2602(1) and 2602(3)	Individual proficiency requirements	Revise to narrow scope of application of this provision from "Approved Persons" to "individual Approved Persons" so that it does not apply to "Incorporated Approved Persons".	Current wording of IDPC Rule subsection refers to "Approved Person"; scope needs to be narrowed to refer to "individual Approved Persons"	No	4.2.3
Rule 2600 - Proficiency requirements and exemptions from proficiencies	Part A, Section 2603 - Proficiency requirements prior to approval	2603(1)	2603(1)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 2600 - Proficiency requirements and exemptions from proficiencies	Part A, Section 2603 - Proficiency requirements prior to approval	2603(1)	2603(1)	Individual proficiency requirements	Revise to narrow scope of application of this provision from "Approved Persons" to "individual Approved Persons" so that it does not apply to "Incorporated Approved Persons".	Current wording of IDPC Rule subsection refers to "Approved Person"; scope needs to be narrowed to refer to "individual Approved Persons"	No	4.2.3
Rule 2600 - Proficiency requirements and exemptions from proficiencies	Part A, Section 2604 - Post-approval proficiency requirements	2604(1) and 2604(2)	2604(1) and 2604(2)	Rule 1 - Business Structures and Qualifications	Rule 1.2.4 - Training and Supervision	Rule 1.2.4	Rule 1.2.4	Rule 2600 - Proficiency requirements and exemptions from proficiencies	Part A, Section 2604 - Post-approval proficiency requirements	2604(1) and 2604(2)	2604(1) and 2604(2)	Individual proficiency requirements	Revise to narrow scope of application of this provision from "Approved Persons" to "individual Approved Persons" so that it does not apply to "Incorporated Approved Persons".	Current wording of IDPC Rule subsection refers to "Approved Person"; scope needs to be narrowed to refer to "individual Approved Persons"	No	4.2.3
Rule 2600 - Proficiency requirements and exemptions	Part A, Section 2605 - Mutual funds only Registered	2605(1) through 2605(6)	2605(1) through 2605(6)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 2600 - Proficiency requirements and exemptions	Part A, Section 2605 - Mutual funds only Registered	2605(1) through 2605(6)	2605(1) through 2605(6)	Individual proficiency requirements	Revise to narrow scope of application of this provision from "Approved Persons" to "individual Approved Persons" so that it does not	Current wording of IDPC Rule subsection refers to "Approved Person"; scope needs to be narrowed to refer to "individual Approved	No	4.2.3



Appendix 8 - Table of concordance summarizing proposed revisions to IDPC, MFD and CIRO Rules

IDPC Rule	IDPC Rule part and section	Existing IDPC Rule reference	New IDPC Rule reference	MFD Rule	MFD Rule part and section	Existing MFD Rule reference	New MFD Rule reference	CIRO Rule	CIRO Rule part and section	Existing CIRO Rule reference	New CIRO Rule reference	Description	Conclusion	Specific comments	Major revision?	Section within the Rules Bulletin
	from proficiencies							from proficiencies	Representatives and Investment Representatives				apply to "Incorporated Approved Persons".	Persons"		
Rule 2600 - Proficiency requirements and exemptions from proficiencies	Part B, Section 2625 - Specific exemptions	2625(1) through 2625(3)	2625(1) through 2625(3)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 2600 - Proficiency requirements and exemptions from proficiencies	Part B, Section 2625 - Specific exemptions	2625(1) through 2625(5)	2625(1) through 2625(5)	Exemptions from individual proficiency requirements	No revisions required		N/A	N/A
Rule 2600 - Proficiency requirements and exemptions from proficiencies	Part B, Section 2626 - General and discretionary exemptions	2626(1) through 2626(3)	2626(1) through 2626(3)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 2600 - Proficiency requirements and exemptions from proficiencies	Part B, Section 2626 - General and discretionary exemptions	2626(1)	2626(1)	Exemptions from individual proficiency requirements	No revisions required		N/A	N/A
Rule 2600 - Proficiency requirements and exemptions from proficiencies	Part B, Section 2627 - Exemptions from completing the required courses	2627(1) through 2627(3)	2627(1) through 2627(3)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 2600 - Proficiency requirements and exemptions from proficiencies	Part B, Section 2627 - Exemptions from completing the required courses	2627(1) through 2627(3)	2627(1) through 2627(3)	Exemptions from individual proficiency requirements	Revise to narrow scope of application of this provision from "Approved Persons" to "individual Approved Persons" so that it does not apply to "Incorporated Approved Persons".	Current wording of IDPC Rule subsection refers to "Approved Person"; scope needs to be narrowed to refer to "individual Approved Persons"	No	4.2.3
Rule 2600 - Proficiency requirements and exemptions from proficiencies	Part B, Section 2628 - Exam Validity	2628(1) through 2627(3)	2628(1) through 2627(3)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 2600 - Proficiency requirements and exemptions from proficiencies	Part B, Section 2628 - Exam Validity	2628(1) through 2627(3)	2628(1) through 2627(3)	Exemptions from individual proficiency requirements	Revise to narrow scope of application of this provision from "Approved Persons" to "individual Approved Persons" so that it does not apply to "Incorporated Approved Persons".	Current wording of IDPC Rule subsection refers to "Approved Person"; scope needs to be narrowed to refer to "individual Approved Persons"	No	4.2.3
Rule 2700 - Continuing education requirements for individual Approved Persons	Rule 2700	2701(1) through 2745(3)	2701(1) through 2745(3)	Rule 1.2.6 and 900 - Continuing Education	Rule 1.2.6 and 900 - Continuing Education	Rule 1.2.6 and 900	Rule 1.2.6 and 900	Rule 2700 - Continuing education requirements for individual Approved Persons	Rule 2700	2701(1) through 2783(3)	2701(1) through 2783(3)	Continuing Education requirements	Revise to narrow scope of application of this provision from "Approved Persons" to "individual Approved Persons" so that it does not apply to "Incorporated Approved Persons".	Current wording of IDPC Rule section and MFD Rule refers to "Approved Person"; scope needs to be narrowed to refer to "individual Approved Persons"	No	4.2.3
Rule 2800 - The National Registration Database (other than IDPC Rule section 2807(2) and 2808(1) discussed below)	Rule 2800	2800(1) through 2806(3)	2800(1) through 2806(3)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 2800 - The National Registration Database (other than IDPC Rule section 2807(2) and 2808(1) discussed below)	Rule 2800	2800(1) through 2806(3)	2800(1) through 2806(3)	Requirements relating to the National Registration Database	Revise scope of application of this provision from "employee" to "individual".	Clarification revision	No	4.2.3
Rule 2800 - The National Registration Database	Section 2807 - Cessation of Approved Person status	2807(2)	2807(2)	No equivalent provision	No equivalent provision	N/A	Rule 1.2.7	Rule 2800 - The National Registration Database	Section 2807 - Cessation of Approved Person status	2807(2)	2807(2)	Cessation of Approved Person status	Revise to state that an individual ceases to be an Approved Person upon termination of any Incorporated Approved Person relationship with the Dealer Member	New provisions are required to revise/introduce individual Approved Person cessation processes.	Yes	4.2.1
Rule 2800 - The National Registration Database	Section 2808 - Reinstatement of Approved Persons	2808(1)	2808(1)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 2800 - The National Registration Database	Section 2808 - Reinstatement of Approved Persons	2808(1)	2808(1)	Reinstatement of Approved Persons	No revisions required		N/A	N/A



Appendix 8 - Table of concordance summarizing proposed revisions to IDPC, MFD and CIRO Rules

IDPC Rule	IDPC Rule part and section	Existing IDPC Rule reference	New IDPC Rule reference	MFD Rule	MFD Rule part and section	Existing MFD Rule reference	New MFD Rule reference	CIRO Rule	CIRO Rule part and section	Existing CIRO Rule reference	New CIRO Rule reference	Description	Conclusion	Specific comments	Major revision?	Section within the Rules Bulletin
Rule 3100 - Dealing with clients	Part B, Section 3110 - Responsibility to identify conflicts of interest	3110(1)	3110(1)	Rule 2 - Business Conduct	Rule 2.1.4(1) - Identifying, addressing and disclosing material conflicts of interest - Member	Rule 2.1.4(1)(a)	Rule 2.1.4(1)(a)	Rule 3100 - Dealing with clients	Part B, Section 3110 - Responsibility to identify conflicts of interest	3105(1)	3105(1)	Requirements relating to the management of conflicts of interest	Revision required to refer to "person" rather than "Approved Person" or "individual".	Rule provision should capture conflicts of interest involving the Dealer Member or any person acting on the Dealer Member's behalf.	Yes	4.2.2
Rule 3100 - Dealing with clients	Part B, Section 3110 - Responsibility to identify conflicts of interest	3110(2)	3110(2)	Rule 2 - Business Conduct	Rule 2.1.4(2) - Identifying, reporting and addressing material conflicts of interest - Approved Person	Rule 2.1.4(2)(a)	Rule 2.1.4(2)(a)	Rule 3100 - Dealing with clients	Part B, Section 3105 - Responsibility to identify conflicts of interest	3105(2)	3105(2)	Requirements relating to the management of conflicts of interest	No revisions required	IDPC Rule subsection and MFD Rule refer to "Approved Person" so pursuant to IDPCR clause 1102(3)(ii) and MFD Rule 1A, Application / Interpretation (ii) will also apply to: (1) Incorporated Approved Persons, and (2) employees and shareholders of Incorporated Approved Persons where the context is appropriate.	No	4.2.2
Rule 3100 - Dealing with clients	Part B, Section 3110 - Responsibility to identify conflicts of interest	3110(3)	3110(3)	Rule 2 - Business Conduct	Rule 2.1.4(2) - Identifying, reporting and addressing material conflicts of interest - Approved Person	Rule 2.1.4(2)(b)	Rule 2.1.4(2)(b)	Rule 3100 - Dealing with clients	Part B, Section 3105 - Responsibility to identify conflicts of interest	3105(3)	3105(3)	Requirements relating to the management of conflicts of interest	No revisions required	IDPC Rule subsection and MFD Rule refer to "Approved Person" so pursuant to IDPCR clause 1102(3)(ii) and MFD Rule 1A, Application / Interpretation (ii) will also apply to: (1) Incorporated Approved Persons, and (2) employees and shareholders of Incorporated Approved Persons where the context is appropriate.	No	4.2.2
Rule 3100 - Dealing with clients	Part B, Section 3111 - Approved Person responsibility to address conflicts of interest	3111(1)	3111(1)	Rule 2 - Business Conduct	Rule 2.1.4(2) - Identifying, reporting and addressing material conflicts of interest - Approved Person	Rule 2.1.4(2)(c)	Rule 2.1.4(2)(c)	Rule 3100 - Dealing with clients	Part B, Section 3106 - Approved Person responsibility to address conflicts of interest	3106(1)	3106(1)	Requirements relating to the management of conflicts of interest	No revisions required	IDPC Rule subsection and MFD Rule refer to "Approved Person" so pursuant to IDPCR clause 1102(3)(ii) and MFD Rule 1A, Application / Interpretation (ii) will also apply to: (1) Incorporated Approved Persons, and (2) employees and shareholders of Incorporated Approved Persons where the context is appropriate.	No	4.2.2
Rule 3100 - Dealing with clients	Part B, Section 3111 - Approved Person responsibility to address conflicts of interest	3111(2)	3111(2)	Rule 2 - Business Conduct	Rule 2.1.4(2) - Identifying, reporting and addressing material conflicts of interest - Approved Person	Rule 2.1.4(2)(d)	Rule 2.1.4(2)(d)	Rule 3100 - Dealing with clients	Part B, Section 3106 - Approved Person responsibility to address conflicts of interest	3106(2)	3106(2)	Requirements relating to the management of conflicts of interest	No revisions required	IDPC Rule subsection and MFD Rule refer to "Approved Person" so pursuant to IDPCR clause 1102(3)(ii) and MFD Rule 1A, Application / Interpretation (ii) will also apply to: (1) Incorporated Approved Persons, and (2) employees and shareholders of Incorporated Approved Persons where the context is appropriate.	No	4.2.2
Rule 3100 - Dealing with clients	Part B, Section 3111 - Approved Person responsibility to address conflicts of interest	3111(3)	3111(3)	Rule 2 - Business Conduct	Rule 2.1.4(2) - Identifying, reporting and addressing material conflicts of interest -	Rule 2.1.4(2)(e)	Rule 2.1.4(2)(e)	Rule 3100 - Dealing with clients	Part B, Section 3106 - Approved Person responsibility to address conflicts of interest	3106(3)	3106(3)	Requirements relating to the management of conflicts of interest	No revisions required	IDPC Rule subsection and MFD Rule refer to "Approved Person" so pursuant to IDPCR clause 1102(3)(ii) and MFD Rule 1A, Application / Interpretation (ii) will also apply to: (1) Incorporated	No	4.2.2



Appendix 8 - Table of concordance summarizing proposed revisions to IDPC, MFD and CIRO Rules

IDPC Rule	IDPC Rule part and section	Existing IDPC Rule reference	New IDPC Rule reference	MFD Rule	MFD Rule part and section	Existing MFD Rule reference	New MFD Rule reference	CIRO Rule	CIRO Rule part and section	Existing CIRO Rule reference	New CIRO Rule reference	Description	Conclusion	Specific comments	Major revision?	Section within the Rules Bulletin
	interest				Approved Person				interest					Approved Persons, and (2) employees and shareholders of Incorporated Approved Persons where the context is appropriate.		
Rule 3100 - Dealing with clients	Part B, Section 3112 - Dealer Member responsibility to address conflicts of interest	3112(1)	3112(1)	Rule 2 - Business Conduct	Rule 2.1.4(1) - Identifying, addressing and disclosing material conflicts of interest - Member	Rule 2.1.4(1)(b)	Rule 2.1.4(1)(b)	Rule 3100 - Dealing with clients	Part B, Section 3107 - Dealer Member responsibility to address conflicts of interest	3107(1)	3107(1)	Requirements relating to the management of conflicts of interest	Revision required to refer to "person" rather than "Approved Person" or "individual".	Rule provision should capture conflicts of interest involving the Dealer Member or any person acting on the Dealer Member's behalf.	Yes	4.2.2
Rule 3100 - Dealing with clients	Part B, Section 3112 - Dealer Member responsibility to address conflicts of interest	3112(2)	3112(2)	Rule 2 - Business Conduct	Rule 2.1.4(1) - Identifying, addressing and disclosing material conflicts of interest - Member	Rule 2.1.4(1)(c)	Rule 2.1.4(1)(c)	Rule 3100 - Dealing with clients	Part B, Section 3107 - Dealer Member responsibility to address conflicts of interest	3107(2)	3107(2)	Requirements relating to the management of conflicts of interest	Revision required to refer to "person" rather than "Approved Person" or "individual".	Rule provision should capture conflicts of interest involving the Dealer Member or any person acting on the Dealer Member's behalf.	Yes	4.2.2
Rule 3100 - Dealing with clients	Part B, Section 3112 - Dealer Member responsibility to address conflicts of interest	3112(3)	3112(3)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 3100 - Dealing with clients	Part B, Section 3107 - Dealer Member responsibility to address conflicts of interest	3107(3)	3107(3)	Requirements relating to the management of conflicts of interest	No revisions required	IDPC Rule subsection 3112(3) refers to "Approved Person" so pursuant to IDPC Rule clause 1102(3)(ii) will also apply to: (1) Incorporated Approved Persons, and (2) employees and shareholders of Incorporated Approved Persons where the context is appropriate.	No	4.2.2
Rule 3100 - Dealing with clients	Part B, Section 3113 - Responsibility to disclose conflicts of interest	3113(3)	3113(3)	Rule 2 - Business Conduct	Rule 2.1.4(1) - Identifying, reporting and addressing material conflicts of interest - Member	Rule 2.1.4(1)(h)	Rule 2.1.4(1)(h)	Rule 3100 - Dealing with clients	Part B, Section 3108 - Responsibility to disclose conflicts of interest	3108(3)	3108(3)	Requirements relating to the management of conflicts of interest	No revisions required	IDPC Rule subsection 3113(3) refers to "Approved Person" so pursuant to IDPC Rule clause 1102(3)(ii) will also apply to: (1) Incorporated Approved Persons, and (2) employees and shareholders of Incorporated Approved Persons where the context is appropriate.	No	4.2.2



Appendix 8 - Table of concordance summarizing proposed revisions to IDPC, MFD and CIRO Rules

IDPC Rule	IDPC Rule part and section	Existing IDPC Rule reference	New IDPC Rule reference	MFD Rule	MFD Rule part and section	Existing MFD Rule reference	New MFD Rule reference	CIRO Rule	CIRO Rule part and section	Existing CIRO Rule reference	New CIRO Rule reference	Description	Conclusion	Specific comments	Major revision?	Section within the Rules Bulletin
Rule 3100 - Dealing with clients	Part B, Section 3116 - Offering gratuity	3116(1)	3116(1)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 3100 - Dealing with clients	Part B, Section 3111 - Offering gratuity	3111(1)	3111(1)	Gratuity prohibition	Clarification revisions required.	Clarification revision	No	4.2.3
Rule 3100 - Dealing with clients	Part B, Section 3117 - Mutual funds sales incentives	3117(2)	3117(2)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 3100 - Dealing with clients	Part B, Section 3112 - Mutual funds sales incentives	3112(2)	3112(2)	Mutual funds sales incentives prohibition	Clarification revisions required.	Clarification revision	No	4.2.3
No equivalent provision	No equivalent provision	N/A	N/A	No equivalent provision	No equivalent provision	N/A	N/A	Rule 3100 - Dealing with clients	Part B, Section 3114 - Referral Arrangements	3114(1) through 3114(3) and 3114(5)	3114(1) through 3114(3) and 3114(5)	Referral arrangements	No revisions required		N/A	N/A
Rule 3200 - Know-your-client and client accounts	Subsection 3201(3) - Defined terms	3201(3)	3201(3)	Rule 2 - Business Conduct	Rule 2.2 - Client accounts	Rule 2.2, Definitions, "financial exploitation"	Rule 2.2, Definitions, "financial exploitation"	Rule 3200 - Know-your-client and client accounts	Subsection 3201(3) - Defined terms	3201(3)	3201(3)	Definitions relevant to client accounts	No revisions required		N/A	N/A
Rule 3200 - Know-your-client and client accounts	Subsection 3201(3) - Defined terms	3201(3)	3201(3)	Rule 2 - Business Conduct	Rule 2.2 - Client accounts	Rule 2.2, Definitions, "temporary hold"	Rule 2.2, Definitions, "temporary hold"	Rule 3200 - Know-your-client and client accounts	Subsection 3201(3) - Defined terms	3201(3)	3201(3)	Definitions relevant to client accounts	No revisions required		N/A	N/A
Rule 3200 - Know-your-client and client accounts	Section 3201 - Introduction	3201(3)	3201(3)	Rule 2 - Business Conduct	Rule 2.2 - Client accounts	Rule 2.2, Definitions, "trusted contact person"	Rule 2.2, Definitions, "trusted contact person"	Rule 3200 - Know-your-client and client accounts	Section 3201 - Introduction	3201(3)	3201(3)	Definitions relevant to client accounts	No revisions required		N/A	N/A
Rule 3200 -	Subsection	3201(3)	3201(3)	Rule 2 -	Rule 2.2 -	Rule 2.2,	Rule 2.2,	Rule 3200 -	Subsection	3201(3)	3201(3)	Definitions relevant to client	No revisions required		N/A	N/A



Appendix 8 - Table of concordance summarizing proposed revisions to IDPC, MFD and CIRO Rules

IDPC Rule	IDPC Rule part and section	Existing IDPC Rule reference	New IDPC Rule reference	MFD Rule	MFD Rule part and section	Existing MFD Rule reference	New MFD Rule reference	CIRO Rule	CIRO Rule part and section	Existing CIRO Rule reference	New CIRO Rule reference	Description	Conclusion	Specific comments	Major revision?	Section within the Rules Bulletin
Know-your-client and client accounts	3201(3) - Defined terms			Business Conduct	Client accounts	Definitions, "vulnerable client"	Definitions, "vulnerable client"	Know-your-client and client accounts	3201(3) - Defined terms			accounts				
Rule 3200 - Know-your-client and client accounts	Section 3202 - Know your client	3202(1) through 3202(4)	3202(1) through 3202(4)	Rule 2 - Business Conduct	Rule 2.2.1 - Know your client	Rule 2.2.1	Rule 2.2.1	Rule 3200 - Know-your-client and client accounts	Section 3202 - Know your client	3202(1) through 3202(4)	3202(1) through 3202(4)	Know your client obligation	No revisions required		N/A	N/A
Rule 3200 - Know-your-client and client accounts	Part B, Section 3214 - Opening new client accounts	3214(6)	3214(6)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 3200 - Know-your-client and client accounts	Part B, Section 3214 - Opening new client accounts	3214(6)	3214(6)	Requirement to require other Dealer Member approval when opening an account for an employee of another Dealer Member	Scope revision required	Expand the scope of application of these "non-client" account provisions to include "Incorporated Approved Person" accounts.	Yes	4.2.2
Rule 3200 - Know-your-client and client accounts	Section 3215 - Updating client accounts	3215(1) through 3215(2)	3215(1) through 3215(2)	Rule 2 - Business Conduct	Rule 2.2.4 - Updating client information	Rule 2.2.4	Rule 2.2.4	Rule 3200 - Know-your-client and client accounts	Section 3215 - Updating client accounts	3215(1) through 3215(2)	3215(1) through 3215(2)	Requirements relating to the update of know your client information	No revisions required		N/A	N/A
Rule 3200 - Know-your-client and client accounts	Section 3216 - Relationship disclosure	3216(1) through 3216(6)	3216(1) through 3216(6)	Rule 2 - Business Conduct	Rule 2.2.7 - Relationship disclosure	Rule 2.2.7	Rule 2.2.7	Rule 3200 - Know-your-client and client accounts	Section 3216 - Relationship disclosure	3216(1) through 3216(6)	3216(1) through 3216(6)	Relationship disclosure requirements	No revisions required		N/A	N/A
Rule 3200 - Know-your-client and client accounts	Part C, Section 3221 - Prohibition against discretionary trading	3221(1)	3221(1)	Rule 2 - Business Conduct	Rule 2.3.1(b) - Discretionary trading	Rule 2.3.1(b)	Rule 2.3.1(b)	Rule 3200 - Know-your-client and client accounts	Part C, Section 3221 - Prohibition against discretionary trading	3221(1)	3221(1)	Discretionary trading prohibition	No revisions required	MFD Rule refers to "Approved Person" so when applied in combination with MFD Rule 1A, Application / Interpretation (ii) will also apply to: (1) Incorporated Approved Persons, and (2) employees and shareholders of Incorporated Approved Persons where the context is appropriate.	No	4.2.2
Rule 3200 - Know-your-client and client accounts	Part C, Section 3222 - Conditions for temporary holds	3222(1) through (3)	3222(1) through (3)	Rule 2 - Business Conduct	Rule 2.2.8 - Conditions for Temporary Hold	Rule 2.2.8	Rule 2.2.8	Rule 3200 - Know-your-client and client accounts	Part C, Section 3222 - Conditions for temporary holds	3222(1) through (3)	3222(1) through (3)	Conditions to be met in order to place a temporary hold on an account	No revisions required	IDPC Rule subsections and MFD Rule refer to "Approved Person" so pursuant to IDPCR clause 1102(3)(ii) and MFD Rule 1A, Application / Interpretation (ii) will also apply to: (1) Incorporated Approved Persons, and (2) employees and shareholders of Incorporated Approved Persons where the context is appropriate.	No	4.2.2
Rule 3200 - Know-your-client and client accounts	Part G, Section 3271 - Rules applicable to discretionary accounts and managed accounts	3271(3)	3271(3)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 3200 - Know-your-client and client accounts	Part G, Section 3271 - Rules applicable to discretionary accounts and managed accounts	3271(3)	3271(3)	Ensuring individuals are proficient to trade or advise on discretionary or managed accounts	No revisions required		N/A	N/A
Rule 3300 - Product due diligence and know-your-product	Section 3301 - Product due diligence	3301(2)	3301(2)	Rule 2 - Business Conduct	Rule 2.2.5 - Know Your Product	Rule 2.2.5(3)	Rule 2.2.5(3)	Rule 3300 - Product due diligence and know-your-product	Section 3301 - Product due diligence	3301(2)	3301(2)	Product due diligence requirements	Revise language from "Approved Persons" to "individual Approved Persons" so that it does not capture "Incorporated Approved Persons".	Current wording of IDPC Rule subsection refers to "Approved Person"; scope needs to be narrowed to refer to "individual Approved Persons"	No	4.2.3
Rule 3300 - Product due diligence and know-your-product	Section 3302 - Know-your-product	3302(1) and (2)	3302(1) and (2)	Rule 2 - Business Conduct	Rule 2.2.5 - Know Your Product	Rule 2.2.5(2) and	Rule 2.2.5(2) and	Rule 3300 - Product due diligence and know-your-product	Section 3302 - Know-your-product	3302(1) and (2)	3302(1) and (2)	Know-your-product requirements	Revise language from "Approved Persons" to	Current wording of IDPC Rule subsection refers to	No	4.2.3



Appendix 8 - Table of concordance summarizing proposed revisions to IDPC, MFD and CIRO Rules

IDPC Rule	IDPC Rule part and section	Existing IDPC Rule reference	New IDPC Rule reference	MFD Rule	MFD Rule part and section	Existing MFD Rule reference	New MFD Rule reference	CIRO Rule	CIRO Rule part and section	Existing CIRO Rule reference	New CIRO Rule reference	Description	Conclusion	Specific comments	Major revision?	Section within the Rules Bulletin
diligence and know-your-product	product			Conduct	Product	2.2.5(2.1)	2.2.5(2.1)	diligence and know-your-product	product				"individual Approved Persons" so that it does not capture "Incorporated Approved Persons".	"Approved Person"; scope needs to be narrowed to refer to "individual Approved Persons"		
Rule 3400 - Suitability determination	Section 3402 - Retail client suitability determination requirements	3402(1)	3402(1)	Rule 2 - Business Conduct	Rule 2.2.6 - Suitability	Rule 2.2.6(1)	Rule 2.2.6(1)	Rule 3400 - Suitability determination	Section 3402 - Retail client suitability determination requirements	3402(1)	3402(1)	Retail client suitability determination requirements	No revisions required		N/A	N/A
Rule 3500 - Sales practices	Section 3503 - Client priority	3503(2) and 3503(3)	3503(2) and 3503(3)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 3500 - Sales practices	Section 3503 - Client priority	3503(2) and 3503(3)	3503(2) and 3503(3)	Client priority requirement	No revisions required	IDPC Rule subsections 3503(2) and 3503(3) refer to "Approved Person" so pursuant to IDPCR clause 1102(3)(ii) will also apply to: (1) Incorporated Approved Persons, and (2) employees and shareholders of Incorporated Approved Persons where the context is appropriate.	No	4.2.2
Rule 3500 - Sales practices	Section 3509 - Premarketing	3509(1) and 3509(6)	3509(1) and 3509(6)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 3500 - Sales practices	Section 3509 - Premarketing	3509(1) and 3509(6)	3509(1) and 3509(6)	Premarketing requirements	No revisions required		N/A	N/A
Rule 3600 - Communications with the Public	Section 3601 - Introduction	3601(1)	3601(1)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 3600 - Communications with the Public	Section 3601 - Introduction	3601(1)	3601(1)	Communications with the public	No revisions required		N/A	N/A
Rule 3600 - Communications with the Public	Part A, Section 3602 - Advertising	3602(5)	3602(5)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 3600 - Communications with the Public	Part A, Section 3602 - Advertising	3602(5)	3602(5)	Requirements relating to advertisements, sales literature and correspondence	No revisions required		N/A	N/A
Rule 3600 - Communications with the Public	Part B, Section 3606 - Definitions	3606(1)	3606(1)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 3600 - Communications with the Public	Part B, Section 3606 - Definitions	3606(1)	3606(1)	Requirements relating to research reports - Definition of "analyst"	Revise to narrow scope of application of this provision from "Approved Persons" to "individual Approved Persons" so that it does not apply to "Incorporated Approved Persons".	Current wording of IDPC Rule subsection refers to "Approved Person"; scope needs to be narrowed to refer to "individual Approved Persons"	No	4.2.3
Rule 3600 - Communications with the Public	Part B, Section 3618 - Public comments	3618(1)	3618(1)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 3600 - Communications with the Public	Part B, Section 3618 - Public comments	3618(1)	3618(1)	Requirements relating to research reports	No revisions required		N/A	N/A
Rule 3600 - Communications with the Public	Part C, Section 3640 - Misleading communications	3640(1) and (2)	3640(1) and (2)	Rule 1 - Business Structures and Qualifications	Rule 1.2.5 - Misleading Communications	Rule 1.2.5	Rule 1.2.5	Rule 3600 - Communications with the Public	Part C, Section 3640 - Misleading communications	3640(1) and (2)	3640(1) and (2)	Misleading communication prohibitions	No revisions required	IDPC Rule subsections and MFD Rule refer to "Approved Person" so pursuant to IDPCR clause 1102(3)(ii) and MFD Rule 1A, Application / Interpretation (ii) will also apply to: (1) Incorporated Approved Persons, and (2) employees and shareholders of Incorporated Approved Persons where the context is appropriate.	No	4.2.2
Rule 3700 - Reporting and handling of complaints, internal investigations and other	Part A, Section 3702 - Reporting by an Approved Person to the Dealer Member	3702(1) and (2)	3702(1) and (2)	Rule 1 - Business Structures and Qualifications	Rule 1.4(b) - Approved Person Reporting	Rule 1.4(b)	Rule 1.4(b)	Rule 3700 - Reporting and handling of complaints, internal investigations and other	Part A, Section 3710 - Reporting by Approved Persons and employees to the Dealer Member	3710(1) and (2)	3702(1) and (2)	Requirements to report to the Dealer Member	Clarification revisions to IDPC and MFD Rules required.	IDPC Rule subsections 3702(1) and 3702(2) and MFD Rule 1.4.1(b) refer to "Approved Person" so pursuant to IDPCR clause 1102(3)(ii) and MFD Rule 1A, Application / Interpretation (ii) will also apply to: (1)	No	4.2.2



Appendix 8 - Table of concordance summarizing proposed revisions to IDPC, MFD and CIRO Rules

IDPC Rule	IDPC Rule part and section	Existing IDPC Rule reference	New IDPC Rule reference	MFD Rule	MFD Rule part and section	Existing MFD Rule reference	New MFD Rule reference	CIRO Rule	CIRO Rule part and section	Existing CIRO Rule reference	New CIRO Rule reference	Description	Conclusion	Specific comments	Major revision?	Section within the Rules Bulletin
								reportable matters						Incorporated Approved Persons, and (2) employees and shareholders of Incorporated Approved Persons where the context is appropriate.		
Rule 3700 - Reporting and handling of complaints, internal investigations and other reportable matters	Part A, Section 3703 - Reporting by a Dealer Member to the Corporation	3703(2)	3703(2)	Rule 1 - Business Structures and Qualifications	Rule 1.4(a) - Member Reporting	Rule 1.4(a)	Rule 1.4(a)	Rule 3700 - Reporting and handling of complaints, internal investigations and other reportable matters	Part A, Section 3711 - Reporting by a Dealer Member to CIRO	3711(2)	3711(2)	Requirements for the Dealer Member to report to the Corporation	No revisions required	IDPC Rule subsection 3703(2) and MFD Rule 1.4.1(a) refer to "Approved Person" so pursuant to IDPCR clause 1102(3)(ii) and MFD Rule 1A, Application / Interpretation (ii) will also apply to: (1) Incorporated Approved Persons, and (2) employees and shareholders of Incorporated Approved Persons where the context is appropriate.	No	4.2.2
Rule 3700 - Reporting and handling of complaints, internal investigations and other reportable matters	Part A, Section 3704, Failure to report	3704(1)	3704(1)	Rule 1 - Business Structures and Qualifications	Rule 1.4(c) - Failure to Report	Rule 1.4(c)	Rule 1.4(c)	Rule 3700 - Reporting and handling of complaints, internal investigations and other reportable matters	Part A, Section 3713, Failure to report	3713(1)	3713(1)	Failure to report administrative penalties	No revisions required	IDPC Rule subsection 3704(1) and MFD Rule 1.4.1(c) refer to "Approved Person" so pursuant to IDPCR clause 1102(3)(ii) and MFD Rule 1A, Application / Interpretation (ii) will also apply to: (1) Incorporated Approved Persons, and (2) employees and shareholders of Incorporated Approved Persons where the context is appropriate.	No	4.2.2
Rule 3700 - Reporting and handling of complaints, internal investigations and other reportable matters	Part B, Section 3706 - Requirement to commence an internal investigation	3706(1)	3706(1)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 3700 - Reporting and handling of complaints, internal investigations and other reportable matters	Part B, Section 3720 - Requirement to commence an internal investigation	3720(1)	3720(1)	Requirement to commence internal investigation	No revisions required	IDPC Rule subsection 3706(1) refers to "Approved Person" so pursuant to IDPCR clause 1102(3)(ii) will also apply to: (1) Incorporated Approved Persons, and (2) employees and shareholders of Incorporated Approved Persons where the context is appropriate.	No	4.2.2
Rule 3700 - Reporting and handling of complaints, internal	Part D, Section 3715 - Policies and procedures	3715(2)	3715(2)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 3700 - Reporting and handling of complaints, internal	Part D, Section 3740 - Policies and procedures	3740(2)	3740(2)	Complaint handling policies and procedures	No revisions required	IDPC Rule subsection 3715(2) refers to "Approved Person" so pursuant to IDPCR clause 1102(3)(ii) will also apply to: (1) Incorporated Approved	No	4.2.2



Appendix 8 - Table of concordance summarizing proposed revisions to IDPC, MFD and CIRO Rules

IDPC Rule	IDPC Rule part and section	Existing IDPC Rule reference	New IDPC Rule reference	MFD Rule	MFD Rule part and section	Existing MFD Rule reference	New MFD Rule reference	CIRO Rule	CIRO Rule part and section	Existing CIRO Rule reference	New CIRO Rule reference	Description	Conclusion	Specific comments	Major revision?	Section within the Rules Bulletin
								investigations and other reportable matters						Persons, and (2) employees and shareholders of Incorporated Approved Persons where the context is appropriate.		
Rule 3700 - Reporting and handling of complaints, internal investigations and other reportable matters	Part E, Section 3721 - Application of	3721(1)	3721(1)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 3700 - Reporting and handling of complaints, internal investigations and other reportable matters	Part E, Section 3750 - Application of	3750(1)	3750(1)	Complaint handling policies and procedures	Expand scope of complaints considered to be a retail client complaint to include retail client complaints against both "employees" and "Approved Persons"	Refers to "Approved Person" so pursuant to clause 1102(3)(ii) will also apply to employees and shareholders of Incorporated Approved Persons where the context is appropriate.	No	4.2.3
Rule 3700 - Reporting and handling of complaints, internal investigations and other reportable matters	Part E, Section 3723 - Complaint policies and procedures	3723(2)	3723(2)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 3700 - Reporting and handling of complaints, internal investigations and other reportable matters	Part E, Section 3754 - Complaint policies and procedures	3754(1)	3754(1)	Complaint handling policies and procedures	Expand scope of complaints considered to be a retail client complaint to include retail client complaints against both "employees" and "Approved Persons"	Refers to "Approved Person" so pursuant to clause 1102(3)(ii) will also apply to employees and shareholders of Incorporated Approved Persons where the context is appropriate.	N/A	N/A
Rule 3700 - Reporting and handling of complaints, internal investigations and other reportable matters	Part E, Section 3727 - Duty to assist in client complaint resolution	3727(1) and (2)	3727(1) and (2)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 3700 - Reporting and handling of complaints, internal investigations and other reportable matters	Part E, Section 3757 - Duty to assist in client complaint resolution	3757(1) and 3757(2)	3757(1) and 3757(2)	Duty to assist in complaint resolution	No revisions required		N/A	N/A
Rule 3700 - Reporting and handling of complaints, internal investigations and other reportable matters	Part E, Section 3728 - Client complaint file and Part G, Section 3786 - Client complaints	3728(1) and 3786(1)	3728(1) and 3786(1)	Rule 300 - Complaint Handling	Rule 300, Part I, Item #2 - Definition	Rule 300, Part I, Item #2	Rule 300, Part I, Item #2	Rule 3700 - Reporting and handling of complaints, internal investigations and other reportable matters	Part G, Section 3771 - Client complaint file	3771(1)	3771(1)	Client compliant file	Scope clarification required	For IDPC Rules expand scope of complaints considered to be a retail client complaint to include retail client complaints against both "employees" and "Approved Persons". MFD Rule refers to "Approved Person" so pursuant to MFD Rule 1A, Application / Interpretation (ii) will also apply to: (1) Incorporated Approved Persons, and (2) employees and shareholders of Incorporated Approved Persons where the context is appropriate.	Yes	4.2.2
Rule 3800 - Dealer Member records and client communications	Section 3804 - General requirements to maintain records	3804(2)	3804(2)	Rule 5 - Books, Records and Reporting	Rule 5.1 - Requirement for Records	Rule 5.1	Rule 5.1	Rule 3800 - Dealer Member records and client communications	Section 3804 - General requirements to maintain records	3804(1)	3804(1)	Record retention requirements	No revisions required		N/A	N/A
Rule 3800 - Dealer Member records and	Section 3816 - Trade confirmations	3816(2)	3816(2)	Rule 5 - Books, Records and Reporting	Rule 5.4.3 - Content	Rule 5.4.3	Rule 5.4.3	No equivalent provision	No equivalent provision	N/A	N/A	Requirement to identify name of individual Approved Person involved in the transaction within the trade	Revise to narrow scope of application of this provision from "Approved Persons" to "individual Approved"	Current wording of IDPC Rule subsections and MFD Rules refer to "Approved Person"; scope needs to be narrowed	No	4.2.3



Appendix 8 - Table of concordance summarizing proposed revisions to IDPC, MFD and CIRO Rules

IDPC Rule	IDPC Rule part and section	Existing IDPC Rule reference	New IDPC Rule reference	MFD Rule	MFD Rule part and section	Existing MFD Rule reference	New MFD Rule reference	CIRO Rule	CIRO Rule part and section	Existing CIRO Rule reference	New CIRO Rule reference	Description	Conclusion	Specific comments	Major revision?	Section within the Rules Bulletin
												confirmation	Persons" so that it does not apply to "Incorporated Approved Persons".	to refer to "individual Approved Persons"		
	client communications															
Rule 3900 - Supervision	Part A, Section 3904 - Policies and procedures	3904(1) through (3)	3904(1) through (3)	Rule 2 - Business Conduct	Rule 2.5.1 - Member responsibilities	Rule 2.5.1	Rule 2.5.1	Rule 3900 - Supervision	Part A, Section 3904 - Policies and procedures	3904(1) through (3)	3904(1) through (3)	Supervisory policies and procedures requirements	Clarification revisions required.	IDPC Rule subsections and MFD Rule refer to "Approved Person" so pursuant to IDPCR clause 1102(3)(ii) and MFD Rule 1A, Application / Interpretation (ii) will also apply to: (1) Incorporated Approved Persons, and (2) employees and shareholders of Incorporated Approved Persons where the context is appropriate.	No	4.2.2
Rule 3900 - Supervision	Part A, Section 3905 - Supervisory personnel and resources	3905(2) and (5)	3905(2) and (5)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 3900 - Supervision	Part A, Section 3905 - Supervisory personnel and resources	3905(2) and (4)	3905(2) and (4)	Requirement to have adequate supervisory personnel	No revisions required	IDPC Rule subsections refer to "Approved Person" so pursuant to IDPCR clause 1102(3)(ii) will also apply to: (1) Incorporated Approved Persons, and (2) employees and shareholders of Incorporated Approved Persons where the context is appropriate.	No	4.2.2
Rule 3900 - Supervision	Part A, Section 3906 - Responsibilities of the Supervisor	3906(1)	3906(1)	Rule 2 - Business Conduct	Rule 2.5.5 - Branch Manager	Rule 2.5.5	Rule 2.5.5	Rule 3900 - Supervision	Part A, Section 3906 - Responsibilities of the Supervisor	3906(1)	3906(1)	Responsibilities of a Supervisor/branch manager	No revisions required	IDPC Rule subsection and MFD Rule refer to "Approved Person" so pursuant to IDPCR clause 1102(3)(ii) and MFD Rule 1A, Application / Interpretation (ii) will also apply to: (1) Incorporated Approved Persons, and (2) employees and shareholders of Incorporated Approved Persons where the context is appropriate.	No	4.2.2
Rule 3900 - Supervision	Part A, Section 3909 - Responsibilities of the Executive	3909(1)	3909(1)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 3900 - Supervision	Part A, Section 3909 - Responsibilities of the Executive	3909(1)	3909(1)	Responsibilities of the Executive	No revisions required	IDPC Rule subsection refers to "Approved Person" so pursuant to IDPCR clause 1102(3)(ii) will also apply to: (1) Incorporated Approved Persons, and (2) employees and shareholders of Incorporated Approved Persons where the context is appropriate.	No	4.2.2
Rule 3900 - Supervision	Part A, Section 3910 - Responsibilities of the Ultimate Designated Person	3910(1) and 3910(2)	3910(1) and 3910(2)	Rule 2 - Business Conduct	Rule 2.5.2 - Ultimate Designated Person	Rule 2.5.2	Rule 2.5.2	Rule 3900 - Supervision	Part A, Section 3910 - Responsibilities of the Ultimate Designated Person	3910(1) and 3910(2)	3910(1) and 3910(2)	Responsibilities of the Ultimate Designated Person	Change IDPC Rule scope from "individual" to "person" and MFD Rule scope from "Approved Persons" to "employees and Approved Persons".	IDPC Rule subsection and MFD Rule refer to "Approved Person" so pursuant to IDPCR clause 1102(3)(ii) and MFD Rule 1A, Application / Interpretation (ii) will also apply to: (1) Incorporated Approved Persons, and (2) employees and shareholders of Incorporated Approved Persons where the context is appropriate.	Yes	4.2.2
Rule 3900 - Supervision	Part A, Section 3912 - Responsibilities	3912(1)	3912(1)	Rule 2 - Business Conduct	Rule 2.5.3 - Chief Compliance Officer	Rule 2.5.3	Rule 2.5.3	Rule 3900 - Supervision	Part A, Section 3912 - Responsibilities	3912(1)	3912(1)	Responsibilities of the Chief Compliance Officer	Change IDPC Rule scope from "individual" to "person" and MFD Rule scope from "Approved Persons" to	IDPC Rule subsection and MFD Rule refer to "Approved Person" so pursuant to IDPCR clause 1102(3)(ii) and	Yes	4.2.2



Appendix 8 - Table of concordance summarizing proposed revisions to IDPC, MFD and CIRO Rules

IDPC Rule	IDPC Rule part and section	Existing IDPC Rule reference	New IDPC Rule reference	MFD Rule	MFD Rule part and section	Existing MFD Rule reference	New MFD Rule reference	CIRO Rule	CIRO Rule part and section	Existing CIRO Rule reference	New CIRO Rule reference	Description	Conclusion	Specific comments	Major revision?	Section within the Rules Bulletin
	es of the Chief Compliance Officer								es of the Chief Compliance Officer				"employees and Approved Persons".	MFD Rule 1A, Application / Interpretation (ii) will also apply to: (1) Incorporated Approved Persons, and (2) employees and shareholders of Incorporated Approved Persons where the context is appropriate.		
Rule 3900 - Supervision	Part A, Section 3913 - Responsibilities of the Chief Financial Officer	3913(1)(iv)	3913(1)(iv)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 3900 - Supervision	Part A, Section 3913 - Responsibilities of the Chief Financial Officer	3913(1)(iv)	3913(1)(iv)	Responsibilities of the Chief Financial Officer	Change IDPC Rule scope from "individual" to "person".	IDPC Rule subsection refers to "Approved Person" so pursuant to IDPCR clause 1102(3)(ii) will also apply to: (1) Incorporated Approved Persons, and (2) employees and shareholders of Incorporated Approved Persons where the context is appropriate.	Yes	4.2.2
Rule 3900 - Supervision	Part A, Section 3915 - Report to Dealer Member's board of directors	3915(1) and (2)	3915(1) and (2)	Rule 2 - Business Conduct	Rule 2.5.4 - Access to Board	Rule 2.5.4	Rule 2.5.4	Rule 3900 - Supervision	Part A, Section 3915 - Report to Dealer Member's board of directors	3915(1) and (2)	3915(1) and (2)	Reporting to the Dealer Member's board of directors	No revisions required	IDPC Rule subsections and MFD Rule refer to "Approved Person" so pursuant to IDPCR clause 1102(3)(ii) and MFD Rule 1A, Application / Interpretation (ii) will also apply to: (1) Incorporated Approved Persons, and (2) employees and shareholders of Incorporated Approved Persons where the context is appropriate.	No	4.2.2
Rule 3900 - Supervision	Part A, Section 3918 - Supervision of shared office premises	3918(2)	3918(2)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 3900 - Supervision	Part A, Section 3918 - Supervision of shared office premises	3918(2)	3918(2)	Supervision of shared office premises	No revisions required	IDPC Rule subsection refers to "Approved Person" so pursuant to IDPCR clause 1102(3)(ii) will also apply to: (1) Incorporated Approved Persons, and (2) employees and shareholders of Incorporated Approved Persons where the context is appropriate.	No	4.2.2
Rule 3900 - Supervision	Part B, Section 3927 - Reviews of account activity	3927(3)	3927(3)	Rule 200 - Minimum Standards for Account Supervision	Rule 200, Part IV and Part V	Rule 200, Part IV and Part V	Rule 200, Part IV and Part V	Rule 3900 - Supervision	Part B, Section 3927 - Reviews of account activity	3927(3)	3927(3)	Reviews of account activity	No revisions required	IDPC Rule subsection and MFD Rule refer to "Approved Person" so pursuant to IDPCR clause 1102(3)(ii) and MFD Rule 1A, Application / Interpretation (ii) will also apply to: (1) Incorporated Approved Persons, and (2) employees and shareholders of Incorporated Approved Persons where the context is appropriate.	No	4.2.2



Appendix 8 - Table of concordance summarizing proposed revisions to IDPC, MFD and CIRO Rules

IDPC Rule	IDPC Rule part and section	Existing IDPC Rule reference	New IDPC Rule reference	MFD Rule	MFD Rule part and section	Existing MFD Rule reference	New MFD Rule reference	CIRO Rule	CIRO Rule part and section	Existing CIRO Rule reference	New CIRO Rule reference	Description	Conclusion	Specific comments	Major revision?	Section within the Rules Bulletin
Rule 3900 - Supervision	Part D, Section 3950 - Supervisory policies and procedures for institutional client accounts	3950(2)(iv)	3950(2)(iv)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 3900 - Supervision	Part D, Section 3950 - Supervisory policies and procedures for institutional client accounts	3950(2)(iv)	3950(2)(iv)	Supervisory policies and procedures for institutional client accounts	Expand the scope of trades subject to trade reviews to include trades in accounts of both "employees" and "Approved Persons"	IDPC Rule subsection refers to "Approved Person" so pursuant to IDPCR clause 1102(3)(ii) will also apply to: (1) Incorporated Approved Persons, and (2) employees and shareholders of Incorporated Approved Persons where the context is appropriate.	Yes	4.2.2
Rule 3900 - Supervision	Part F, Section 3964 - Access to Approved Persons qualified in derivatives	3964(1)	3964(1)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 3900 - Supervision	Part F, Section 3964 - Access to Approved Persons qualified in derivatives	3964(1)	3964(1)	Access to Approved Persons qualified in derivatives	No revisions required		N/A	N/A
Rule 7100 - Debt markets	Section 7113 - Surveillance and reporting	7113(1)	7113(1)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 7100 - Debt markets	Section 7113 - Surveillance and reporting	7113(1)	7113(1)	Surveillance and reporting	Revise to expand scope of application of this provision to include "Approved Persons".	Current wording of IDPC Rule subsection refers to "employee"; scope needs to be broadened to also refer to "Incorporated Approved Persons"	No	4.2.3
Rule 8200 - Enforcement Proceedings	Part A, Section 8208	8208(3)	8208(3)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 8200 - Enforcement Proceedings	Part A, Section 8208	8208(3)	8208(3)	Powers of compulsion	No revisions required		N/A	N/A
Rule 8200 - Enforcement Proceedings	Part B, Section 8210	8210(1)	8210(1)	Rule 7 - Discipline	Rule 7.4.1.1 - Approved Persons	Rule 7.4.1.1	Rule 7.4.1.1	Rule 8200 - Enforcement Proceedings	Part B, Section 8210	8210(1)	8210(1)	Sanctions for Regulated Persons other than Dealer Members	No revisions required		N/A	N/A
Rule 8400 - Rules of practice and procedure	Part A, Section 8406 - Service and filing	8406(2)	8406(2)	Rule 7 - Discipline	Rule 7.3.1.3 - Notice to Members in the Case of an individual	Rule 7.3.1.3	Rule 7.3.1.3	Rule 8400 - Rules of practice and procedure	Part A, Section 8406 - Service and filing	8406(2)	8406(2)	Service and filing	Clarification revisions required.	Clarification revision	No	4.2.3
Rule 8400 - Rules of practice and procedure	Part B, Section 8421 - Order to attend and issue of summons	8421(3)	8421(3)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 8400 - Rules of practice and procedure	Part B, Section 8421 - Order to attend and issue of summons	8421(3)	8421(3)	Order to attend and issue of summons	No revisions required		N/A	N/A
Rule 9200 - Approvals and regulatory supervision	Section 9201 - Introduction	9201(1)	9201(1)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 9200 - Approvals and regulatory supervision	Section 9201 - Introduction	9201(1)	9201(1)	Introduction subsection	Clarification revisions required.	New or clarified introduction language	No	4.2.3
Rule 9200 - Approvals and regulatory supervision	Section 9203 - Corporation decisions	9203(2)	9203(2)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 9200 - Approvals and regulatory supervision	Section 9203 - Corporation decisions	9203(2)	9203(2)	Corporation decisions	No revisions required		N/A	N/A
Rule 9200 - Approvals	Section 9206 - Exemption	9206(1)	9206(1)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 9200 - Approvals	Section 9206 - Exemption	9206(1)	9206(1)	Exemption applications	Revise to narrow scope of application of this provision	Current wording of IDPC Rule subsection refers to	No	4.2.3



Appendix 8 - Table of concordance summarizing proposed revisions to IDPC, MFD and CIRO Rules

IDPC Rule	IDPC Rule part and section	Existing IDPC Rule reference	New IDPC Rule reference	MFD Rule	MFD Rule part and section	Existing MFD Rule reference	New MFD Rule reference	CIRO Rule	CIRO Rule part and section	Existing CIRO Rule reference	New CIRO Rule reference	Description	Conclusion	Specific comments	Major revision?	Section within the Rules Bulletin
and regulatory supervision	applications							and regulatory supervision	applications				from "Approved Persons" to "individual Approved Persons" so that it does not apply to "Incorporated Approved Persons".	"Approved Person"; scope needs to be narrowed to refer to "individual Approved Persons"		
Rule 9200 - Approvals and regulatory supervision	Section 9207 - Continued approval	9207(1) and (2)	9207(1) and (2)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 9200 - Approvals and regulatory supervision	Section 9207 - Continued approval	9207(1) and (2)	9207(1) and (2)	Continued approval	No revisions required		N/A	N/A
Rule 9200 - Approvals and regulatory supervision	Section 9209 - Review hearings	9209(1)	9209(1)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 9200 - Approvals and regulatory supervision	Section 9209 - Review hearings	9209(1)	9209(1)	Review hearings	No revisions required		N/A	N/A
Rule 9400 - Procedures for opportunities to be heard...	Part A, Section 9401 - Introduction	9401(1)	9401(1)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 9400 - Procedures for opportunities to be heard...	Part A, Section 9401 - Introduction	9401(1)	9401(1)	Introduction subsection	Clarification revisions required.	New or clarified introduction language	No	4.2.3
Rule 9400 - Procedures for opportunities to be heard...	Part A, Section 9404 - Counsel	9404(2)	9404(2)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 9400 - Procedures for opportunities to be heard...	Part A, Section 9404 - Counsel	9404(2)	9404(2)	Counsel	No revisions required		N/A	N/A
Rule 9400 - Procedures for opportunities to be heard...	Part A, Section 9405 - Corporation Staff notice	9405(1)	9405(1)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 9400 - Procedures for opportunities to be heard...	Part A, Section 9405 - Corporation Staff notice	9405(1)	9405(1)	Corporation Staff notice	No revisions required		N/A	N/A
Rule 9400 - Procedures for opportunities to be heard...	Part A, Section 9406 - Response of applicant, Approved Person or Dealer Member	9406(1)	9406(1)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 9400 - Procedures for opportunities to be heard...	Part A, Section 9406 - Response of applicant, Approved Person or Dealer Member	9406(1)	9406(1)	Response	No revisions required		N/A	N/A
Rule 9400 - Procedures for opportunities to be heard...	Part A, Section 9407 - Choice of written submissions or appearance	9407(1)	9407(1)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 9400 - Procedures for opportunities to be heard...	Part A, Section 9407 - Choice of written submissions or appearance	9407(1)	9407(1)	Choice of written submissions or appearance	No revisions required		N/A	N/A
Rule 9400 - Procedures for opportunities to be heard...	Part A, Section 9408 - Exchange of written submissions	9408(2) through (5)	9408(2) through (5)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 9400 - Procedures for opportunities to be heard...	Part A, Section 9408 - Exchange of written submissions	9408(2) through (5)	9408(2) through (5)	Exchange of written submissions	No revisions required		N/A	N/A
Rule 9400 - Procedures for opportunities to be heard...	Part A, Section 9409 - Appearance before a decision maker	9409(3)	9409(3)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 9400 - Procedures for opportunities to be heard...	Part A, Section 9409 - Appearance before a decision maker	9409(3)	9409(3)	Appearance before a decision maker	No revisions required		N/A	N/A
Rule 9400 - Procedures for opportunities to be heard...	Part A, Section 9410 - Decisions	9410(1)	9410(1)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 9400 - Procedures for opportunities to be heard...	Part A, Section 9410 - Decisions	9410(1)	9410(1)	Decisions	No revisions required		N/A	N/A
Rule 9400 -	Part B,	9413(1)	9413(1)	No equivalent	No equivalent	N/A	N/A	Rule 9400 -	Part B,	9413(1)	9413(1)	Response	No revisions required		N/A	N/A



Appendix 8 - Table of concordance summarizing proposed revisions to IDPC, MFD and CIRO Rules

IDPC Rule	IDPC Rule part and section	Existing IDPC Rule reference	New IDPC Rule reference	MFD Rule	MFD Rule part and section	Existing MFD Rule reference	New MFD Rule reference	CIRO Rule	CIRO Rule part and section	Existing CIRO Rule reference	New CIRO Rule reference	Description	Conclusion	Specific comments	Major revision?	Section within the Rules Bulletin
Procedures for opportunities to be heard...	Section 9413 - Response of applicant, Approved Person or Dealer Member			provision	provision			Procedures for opportunities to be heard...	Section 9413 - Response of applicant, Approved Person or Dealer Member							
Rule 9500 - Alternative dispute resolution	Section 9504 - Dealer Members must provide information to ombudsman service	9504(1)	9504(1)	No equivalent provision	No equivalent provision	N/A	N/A	Rule 9500 - Alternative dispute resolution	Section 9504 - Dealer Members must provide information to ombudsman service	9504(1)	9504(1)	Provision of information to ombudsman service	No revisions required		N/A	N/A
No equivalent definition	No equivalent definition	N/A	N/A	Rule 1A - Application, Interpretation, Exemptions, and Definitions	Definitions	Rule 1A, Definitions	Rule 1A, Definitions	No equivalent definition	No equivalent definition	N/A	N/A	Definition of "securities legislation"	No revisions required		N/A	N/A
No equivalent provision	No equivalent provision	N/A	N/A	Rule 1 - Business Structures and Qualifications	Rule 1.1.1 - Members	Rule 1.1.1(a)	Rule 1.1.1(a)	No equivalent provision	No equivalent provision	N/A	N/A	Requirement to carry on all securities related business for the account of the Member and through the facilities of the member with the exception of trading in deposit instruments and business conducted as an employee of a bank	No revisions required	MFD Rule refers to "Approved Person" so pursuant to IDPCR clause 1102(3)(ii) and MFD Rule 1A, Application / Interpretation (ii) will also apply to: (1) Incorporated Approved Persons, and (2) employees and shareholders of Incorporated Approved Persons where the context is appropriate.	No	4.2.2
No equivalent provision	No equivalent provision	N/A	N/A	Rule 1 - Business Structures and Qualifications	Rule 1.1.3 - Service Arrangements	Rule 1.1.3	Rule 1.1.3	No equivalent provision	No equivalent provision	N/A	N/A	Requirements that apply to arrangements to provide services to the Member of Approved Person.	No revisions required	MFD Rule refers to "Approved Person" so pursuant to IDPCR clause 1102(3)(ii) and MFD Rule 1A, Application / Interpretation (ii) will also apply to: (1) Incorporated Approved Persons, and (2) employees and shareholders of Incorporated Approved Persons where the context is appropriate.	No	4.2.2
Rule 2300 - Principal and Agent Relationships	Section 2302 - Permissible relationships	2302(2)	N/A	No equivalent provision	No equivalent provision	N/A	N/A	Rule 2300 - Principal and Agent Relationships	Section 2302 - Permissible relationships	2302(2)	N/A	Subsection prohibiting incorporated advisor arrangements	Repeal IDPC Rule subsection		Yes	4.2.1
No equivalent provision	No equivalent provision	N/A	N/A	Rule 1 - Business Structures and Qualifications	Rule 1.1.4 - Employees	Rule 1.1.4	Rule 1.1.4	No equivalent provision	No equivalent provision	N/A	N/A	Requirements for entering into an employer and employee relationship	No revisions required		N/A	N/A
Rule 2300 - Principal and Agent Relationships	Section 2304 - Written agreement between the Dealer Member and its agents	2304(6)	N/A	No equivalent provision	No equivalent provision	N/A	N/A	Rule 2300 - Principal and Agent Relationships	Section 2304 - Written agreement between the Dealer Member and its agents	2304(6)	N/A	IDPC Rule subsection and MFD Rule set out requirements for entering into a principal and agent relationship agreement between the dealer and the agent	Remove IDPC Rule subsection that specifically refers to tax legislation.	Revisions are required to harmonize existing principal and agent relationship requirements for investment dealers and mutual fund dealers	No	N/A
No equivalent provision	No equivalent provision	N/A	N/A	Rule 5 - Books,	Rule 5.3.2 - Content of	Rule 5.3.2	Rule 5.3.2	No equivalent provision	No equivalent provision	N/A	N/A	Requirement to identify name of individual Approved	Revise to narrow scope of application of this provision	Current wording of MFD Rule refers to "Approved Person";	No	4.2.3



Appendix 8 - Table of concordance summarizing proposed revisions to IDPC, MFD and CIRO Rules

IDPC Rule	IDPC Rule part and section	Existing IDPC Rule reference	New IDPC Rule reference	MFD Rule	MFD Rule part and section	Existing MFD Rule reference	New MFD Rule reference	CIRO Rule	CIRO Rule part and section	Existing CIRO Rule reference	New CIRO Rule reference	Description	Conclusion	Specific comments	Major revision?	Section within the Rules Bulletin
				Records and Reporting	Account Statement							Person servicing the account within the account statement	from "Approved Persons" to "individual Approved Persons" so that it does not apply to "Incorporated Approved Persons".	scope needs to be narrowed to refer to "individual Approved Persons"		
No equivalent provision	No equivalent provision	N/A	N/A	Rule 4 - Insurance	Rule 4.4.1 - Minimum	Rule 4.4.1	Rule 4.4.1	No equivalent provision	No equivalent provision	N/A	N/A	Requirements specifying how the minimum amount of insurance coverage for mutual fund dealers is to be determined.	Revise to narrow scope of application of this provision from "Approved Persons" to "individual Approved Persons" so that the number of Incorporated Approved Persons the Member sponsors is not considered in the determination of the minimum amount of required insurance coverage.	Current wording of MFD Rule refers to "Approved Person"; scope needs to be narrowed to refer to "individual Approved Persons"	No	4.2.3