



# CIRO · OCRI

Canadian Investment  
Regulatory  
Organization

Organisme canadien  
de réglementation  
des investissements

## STRICT SUPERVISION REPORT

To be filed with the Registration Department of the Canadian Investment Regulatory Organization (CIRO)

*The designated Supervisor or Branch Manager (the "Supervisor") must complete this strict supervision report. The Supervisor must provide a copy of this report to the firm's Chief Compliance Officer.*

*The undersigned certifies that all supervisory activities required by this strict supervision report have been properly performed, and that reasonable steps have been taken to confirm the accuracy of the information provided.*

Print Name: \_\_\_\_\_ Position: \_\_\_\_\_

Sign Name: \_\_\_\_\_ Date: \_\_\_\_\_

This is a strict supervision report and is required by the terms and conditions (the "Terms and Conditions") on the registration approval of the individual to which it relates (the "Approved Person")

The name of the Approved Person is: \_\_\_\_\_

The Approved Person's sponsoring firm ("firm") is \_\_\_\_\_

The Terms and Conditions were imposed on: \_\_\_\_\_

The period covered by this report is: \_\_\_\_\_

During the reporting period, the Approved Person placed \_\_\_\_\_ trades in \_\_\_\_\_ different client accounts, of which \_\_\_\_\_ were leveraged trades. These numbers do not include trades made through pre-authorized contribution plans implemented prior to the imposition of the Terms and Conditions.

### Part A - Instructions

1. While the Approved Person is subject to the Terms and Conditions:
  - (a) each order made by the Approved Person must be **pre-approved** by their Supervisor prior to the order being placed (excluding trades made through pre-authorized contribution plans implemented prior to the imposition of the Terms and Conditions); and
  - (b) the Supervisor must review all client accounts on a daily and monthly basis, regardless of the commissions generated.
2. For the purpose of this report, "order" is defined as a purchase, sale, switch, change or cancel former order, or any other transfer of securities (excluding trades made through pre-authorized contribution plans implemented prior to the imposition of the Terms and Conditions).
3. For the purpose of this report, "trade" is defined as an executed order.

4. The review undertaken by the firm pursuant to the Terms and Conditions must check for the following: (Collectively, the “Review Issues”)
- (a) no orders have been placed in any client account until all material documentation is in place;
  - (b) all applicable fees have been appropriately disclosed to the client prior to the order being placed;
  - (c) investment suitability, including the suitability of leveraging, if any, and any recent amendments to Know Your Client information;
  - (d) all review criterion in accordance with applicable rules regarding account supervision;
  - (e) trades that have not been pre-approved;
  - (f) transfers and / or deposits of securities;
  - (g) trading activity relative to the Approved Person’s internal and external personal accounts, if the Investment Dealer and Partially Consolidated (IDPC) Rules apply;
  - (h) there has been no handling of any client funds or securities by the Approved Person and no issuance of cheques to any clients without management approval;
  - (i) any additional issues specifically identified in the Terms and Conditions as being subject to trade reviews for the purpose of this strict supervision report; and
  - (j) any other issues identified by the firm during the review.
5. If the firm identifies an issue with respect to a proposed order, the firm must not approve the order until the issue has been resolved.
6. The firm must maintain a copy of this report in its records, including all information supporting this filing. The firm must maintain the records following the removal of the Terms and Conditions or the termination of the Approved Person.
7. If the firm identifies that it has failed to comply with anything in these instructions, the firm shall immediately deliver to Staff written notice of its non-compliance and its explanation for the non-compliance.

**Part B - Supervision Information**

Did the firm identify any Review Issues during the reporting period? Yes  No

If yes, please complete *Appendix A: Supervision Information* for all Review Issues identified by the firm.

**Part C - Client Complaints**

Did the firm receive any client complaints against the Approved Person during the reporting period?  
Yes  No

If yes, please complete *Appendix B: Client Complaints* for all complaints received from clients about the Approved Person during the review period.

**Part D - Additional Information**

If as a part of its supervision of the Approved Person during the review period the firm has identified any instance where the Approved Person may not have complied with securities legislation, the requirements of either the IDPC Rules or Mutual Fund Dealer (MFD) Rules, as applicable, or the firm's policies and procedures, please complete *Appendix C: Additional Information*, unless the information has already been identified elsewhere in this report.

Does the firm have additional information to report?    Yes     No

**Appendix A: Supervision Information**

Please complete the following chart: *Supervision Information* for all Review Issues identified by the firm during the review period.

The name of the Approved Person is: \_\_\_\_\_

The Approved Person's firm is: \_\_\_\_\_

The period covered by this report is: \_\_\_\_\_

<b>Client Account Number</b>	<b>Proposed order or trade</b>	<b>Review Issue Identified</b>	<b>If the order or trade proceeded, how was the issue resolved?</b>	<b>If the order did not proceed, or the trade was cancelled, what became of the issue?</b>

**Appendix B: Client Complaints**

The name of the Approved Person is: \_\_\_\_\_

The Approved Person's firm is: \_\_\_\_\_

The period covered by this report is: \_\_\_\_\_

If the complaint is reportable on ComSet, please provide the ComSet Number for each complaint:

\_\_\_\_\_  
\_\_\_\_\_

If the complaint is not reportable to ComSet, please complete the following chart: *Client Complaints not Reportable on Comset* for all complaints received from clients regarding the Approved Person during the review period.

<b>Client Account Number</b>	<b>Date of Complaint</b>	<b>Description of Complaint</b>	<b>Firm's Response / Action Taken</b>

**Appendix C: Additional Information**

The name of the Approved Person is: \_\_\_\_\_

The Approved Person's firm is: \_\_\_\_\_

The period covered by this report is: \_\_\_\_\_

If as a part of its supervision of the Approved Person during the review period the firm has identified any instance where the Approved Person may not have complied with securities legislation, the requirements of either the IDPC Rules or MFD Rules, as applicable, or the firm's policies and procedures, please identify those instances unless the information has already been identified elsewhere in this report.