

IIROC NOTICE

Administrative Notice General

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Review of Members' Business Continuity Plans

In 2006, we implemented [Rule 17.16](#) to require IIROC Dealer Members to have in place business continuity plans (BCP) to ensure they meet their obligations to their clients following a significant business disruption.

At the time of rule implementation, Staff required that continuity plans of self-clearing Members had to be reviewed by an independent qualified reviewer once developed and every three years thereafter.

Following internal discussions and consideration as well as consultations with members of the Contingency Planning Sub-Committee, staff has determined that independent certification of self-clearing Dealer Members' business continuity plans after the initial independent certification in 2006 should not be required on an on-going basis. Instead, such Dealer Members will assume the responsibility to review, update and test their plans at least annually. To document completion of this work, the CEOs of IIROC self-clearing Dealer Members must certify to IIROC annually that they have adequate plans that work and meet the requirements of [Rule 17.16](#).

When the rule was introduced in 2006, Financial Compliance examiners reviewed introducing Members' plans in lieu of the independent review. Introducing Members' plans will no longer be



subjected to a review by the Financial Compliance examiners. Introducing Members will also be required to certify to IIROC regarding the adequacy of their plans. This will ensure self-review of continuity plans is applied consistently by all Members.

CEO certifications, a sample of which will be developed and posted to the IIROC website, will be required to be filed with IIROC by December 31, 2009.

This change in approach will not apply in all situations. IIROC staff will continue to require current Dealer Members, that have undergone changes in their business activities, systems or environment that will likely have a substantial impact on their continuity plans and new Dealer Members to have their plans independently reviewed by IIROC approved qualified reviewers. We expect Members to monitor their situation to assess the impact of changes on their business continuity plans and advise IIROC if an independent review becomes necessary.