Corollary amendments to IIROC Dealer Member Rules 19, 37 and 2500, Section VIII

Rule 19

19.4. Each Dealer Member shall keep an up to date record in a central place of all written complaints received by it relating to the conduct, business and affairs of the Dealer Member, any registered representative, investment representative, branch manager, assistant or co-branch manager, sales manager, partner, director or officer, or any person employed by the Dealer Member, for a period of 24 months from the date of receipt of the complaint. Repealed.

Rule 37

37.3 Each Dealer Member shall provide to new clients, and to clients who submit written complaints to the Dealer Member, a copy of the written material approved by the Corporation which describes the arbitration programme or organization approved by the Board of Directors pursuant to Rule 37.1 and the ombudsperson service approved by the Board of Directors pursuant to Rule 37.2. Repealed.

Rule 2500, Section VIII

VIII. Client Complaints

Each Dealer Member must establish policies and procedures to deal effectively with client complaints. Such policies and procedures must comply with Rule 2500B regarding client complaint handling, and also address complaints that may fall outside the scope of Rule 2500B. All complaints made in writing must be provided with a written response from Dealer Members.

- 1. Each Dealer Member must establish procedures to deal effectively with client complaints.
 - (a) The Dealer Member must acknowledge all written client complaints.
 - (b) The Dealer Member must convey the results of its investigation of a client complaint to the client in due course.
 - (c) Client complaints involving the sales practices of a Dealer Member, its partners, Directors, Officers or employees must be in writing and signed by the client and then handled by sales supervisors or compliance staff. Copies of all such written submissions must be filed with the compliance department of the Dealer Member.
 - (d) Each Dealer Member must ensure that Registered Representatives and their supervisors are made aware of all complaints filed by their clients.
- 2. All pending legal actions must be made known to head office.
- Each Dealer Member must put procedures in place so that senior management is made aware of complaints of serious misconduct and of all legal actions.

- 4. Each Dealer Member must maintain an orderly record of complaints together with follow up documentation for regular internal/external compliance reviews. This record must cover the past two years at least.
- 5. Each Dealer Member must establish procedures to ensure that breaches of the bylaws, regulations, rules and policies of the SROs as well as applicable securities legislation are subjected to appropriate internal disciplinary procedures.
- 6. When a Dealer Member finds complaints to be a significant factor, internal procedures and practices should be reviewed, with recommendations for changes to be submitted to the appropriate management level.