

[DEALER MEMBER] – Rule Reference Table

ACCOUNT OPENING	POLICIES & PROCEDURES – MANUAL NAME & LOCATION
<p>Account opening approval and documentation</p> <ul style="list-style-type: none"> • IIROC Rules 2550 - 2553 • IIROC Rule 3904 • IIROC Rule 3925 • IIROC Rules 3252, 3255, 3960 - 3963 • IIROC Rules 3926(6), 3201- 3202, 3214 • IIROC Rule 3216 • National Instrument 31-103, Part 11 	
<p>Identity Verification</p> <ul style="list-style-type: none"> • IIROC Rule 3202 - 3210 • FINTRAC Guidance, Know your client requirements, When to identify individuals and confirm the existence of entities – Securities dealers • FINTRAC Guidance, Know your client requirements, Methods to identify and confirm the existence of entities • FINTRAC Guidance, Record keeping requirements for securities dealers • FINTRAC Guidance, Know your client requirements, Ongoing monitoring requirements • Proceeds of Crime (Money Laundering) and Terrorist Financing Act Part1, sections 5 & 6.1 	
<p>Politically Exposed Persons & Heads of International Organizations</p> <ul style="list-style-type: none"> • FINTRAC Guidance, Know your client requirements, Politically exposed person and heads of international organizations 	
<p>Pending documentation process</p> <ul style="list-style-type: none"> • IIROC Rules 3214(1) & 3213(2)(i) – (iii). 	
<p>Disclosure of shared premises</p> <ul style="list-style-type: none"> • IIROC Rule 2216 	
<p>Referral Arrangements</p> <ul style="list-style-type: none"> • National Instrument 31-103, sections 13.8-13.10 	
<p>Power of Attorney and Trading Authorization</p> <ul style="list-style-type: none"> • Securities Act (Quebec), R.S.Q.c. V-1.1, Chapter I, General Provisions, 148; and/or • Securities Act (British Columbia), R.S.B.C. 1996, Part 5 - Registration, (34); and/or • Securities Act (Alberta), RSA 2000, c S-4, Part 5 - Registration, (75.1) 	

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Updating client information <ul style="list-style-type: none">• IIROC Rules 3214(3) & 3215	
Accounts of Employees of Other Dealer Member Firms <ul style="list-style-type: none">• IIROC Rule 3214(6)• IIROC Rules 3214(6) & 3945(4)	
Hold mail Accounts <ul style="list-style-type: none">• IIROC Rule 3219(1)	
Returned Mail <ul style="list-style-type: none">• IIROC Rule 3219(3)	
Accounts of terminated Registrants <ul style="list-style-type: none">• IIROC Rule 3215(3) & (4)	
Off-book Transactions <ul style="list-style-type: none">• IIROC Rule 3804• IIROC Rules 3805 - 3819• IIROC Member Regulation Notice MR0481• IIROC Compliance Interpretation Bulletin C-93• IIROC Compliance Interpretation Bulletin C-106	

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ADVERTISING	POLICIES & PROCEDURES - MANUAL NAME & LOCATION
<p>List of potential misrepresentations of advertisement, sales literature or correspondence</p> <ul style="list-style-type: none"> • IIROC Rule 3603(1)(i) - (vii) 	
<p>Policies and procedures appropriate to the Dealer Member with respect to its review and supervision of advertisements, sales literature and correspondence</p> <ul style="list-style-type: none"> • IIROC Rule 3603(2) & (3) 	
<p>Websites/Social Media</p> <ul style="list-style-type: none"> • IIROC Rule 3603(4) • IIROC Notice 11-0349 	
<p>Record Retention</p> <ul style="list-style-type: none"> • IIROC Rule 3803(1) • IIROC Notice 11-0349 • National Instrument 31-103, section 11.5 	
<p>Trade Names</p> <ul style="list-style-type: none"> • IIROC Rules 2280 - 2283 	
<p>Mutual Fund - Sales Incentives</p> <ul style="list-style-type: none"> • IIROC Rule 3117 • National Instrument 81-105, sections 4.1 & 4.2 	
<p>Mutual Funds - Marketing and Educational Practices</p> <ul style="list-style-type: none"> • National Instrument 81-105, Part 5 	
<p>Mutual Funds – Sales Communications and Prohibited Representations</p> <ul style="list-style-type: none"> • National Instrument 81-102, Part 15 	
<p>CIPF Disclosure Policy</p> <ul style="list-style-type: none"> • IIROC Rule 2284 	
<p>Use of Name or Logo of IIROC and IIROC Disclosure Policy</p> <ul style="list-style-type: none"> • IIROC Rule 2285 	

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Third Party Research <ul style="list-style-type: none"><li data-bbox="240 260 545 289">• IIROC Rule 3611(1) & (2)	
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COMPLAINTS & INTERNAL INVESTIGATIONS	POLICIES & PROCEDURES - MANUAL NAME & LOCATION
Reporting and Recordkeeping Requirements <ul style="list-style-type: none"><li data-bbox="237 422 456 449">• IIROC Rule 3700	
Client Complaint Handling (Retail) <ul style="list-style-type: none"><li data-bbox="237 554 526 581">• IIROC Rule 3720 Part E	
Client Complaints (Institutional) <ul style="list-style-type: none"><li data-bbox="237 686 526 714">• IIROC Rule 3715 Part D	

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COMPLIANCE INFRASTRUCTURE	POLICIES & PROCEDURES - MANUAL NAME & LOCATION
Board of Director Composition, Reporting & Role <ul style="list-style-type: none"> • IIROC Rule 3915(3) & (4) • IIROC Notice 12-0379 	
UDP Role & Supervisory Infrastructure <ul style="list-style-type: none"> • IIROC Rule 3916(1) • IIROC Rule 1201 • IIROC Rule 1405 - 1406 • IIROC Rule 1500 • IIROC Rules 2507 & 3910 • IIROC Rules 2503 & 3909 • IIROC Rule 3905 • IIROC Rule 1103 • IIROC Rule 3907 • IIROC Notice 14-0012 • IIROC Notice 12-0379 • National Instrument 31-103, section 11.1 	
CCO Role & Compliance Department Infrastructure <ul style="list-style-type: none"> • IIROC Rule 1201 • IIROC Rules 2506 & 3912 • IIROC Notice 12-0379 	
Policies and Procedures Maintenance <ul style="list-style-type: none"> • IIROC Rules 1404 & 3904 • IIROC Rule 1502(3) • IIROC Rule 3926 • National Instrument 31-103, section 11.1 	
Business Location Audit Program <ul style="list-style-type: none"> • IIROC Rule 1405 • IIROC Rules 3905(6) & 3908 • IIROC Rules 3906 & 3908 • IIROC Rule 2304(7)(ix) - (x) • IIROC Notice 09-0370 	
PCMLTFA (AML) Compliance Regime <ul style="list-style-type: none"> • Proceeds of Crime (Money Laundering) and Terrorist Financing Act, section 9.6(1) • Proceeds of Crime (Money Laundering) and Terrorist Financing Regulations, section 71 • FINTRAC Guideline “Compliance Program” • IIROC Notice 10-0273 & 19-0201 	

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CONFLICT OF INTEREST	POLICIES & PROCEDURES - MANUAL NAME & LOCATION
<p>General Conflict of Interest Management</p> <p><i>Conflict Management</i></p> <ul style="list-style-type: none"> • IIROC Rules 3110 - 3114 • National Instrument 31-1-3, section 13.4 • IIROC Notice 12-017 & 12-018 	
<p>Corporate</p> <p><i>Complex Group of Companies – Related / Connected</i></p> <ul style="list-style-type: none"> • IIROC Rules 3110 - 3114 • National Instrument 31-103, sections 13.4 & 13.6 <p><i>Referral Programs / Cross Selling / Tied Selling</i></p> <ul style="list-style-type: none"> • IIROC Rules 3110 – 3114 • IIROC Rule 3118 • National Instrument 31-103, sections 13.7 – 13.11 <p><i>Supervisor Structure & Compensation – not just Principal / Agent</i></p> <ul style="list-style-type: none"> • IIROC Rules 3110 - 3114 • IIROC Rule 3904 • IIROC Rule 2304(7)(v)(a) • National Instrument 31-103, section 13.4 	
<p>Compensation Program / Grids</p> <p><i>Overall Compensation Program</i></p> <ul style="list-style-type: none"> • IIROC Rules 3110 - 3114 • National Instrument 31-103, section 13.4 • IIROC Notice 17-0093 <p><i>Compensation Grids</i></p> <ul style="list-style-type: none"> • IIROC Rules 3110 - 3114 • National Instrument 31-103, section 13.4 • IIROC Notice 17-0093 <p><i>Sales Targets</i></p> <ul style="list-style-type: none"> • IIROC Rules 3110 - 3114 • National Instrument 31-103, section 13.4 • IIROC Notice 17-0093 <p><i>Bonuses – including Signing or Retention Bonus, Titles, Presidents Club</i></p> <ul style="list-style-type: none"> • IIROC Rules 3110 - 3114 • National Instrument 31-103, section 13.4 • IIROC Notice 17-0093 <p><i>Soliciting Dealer Arrangements</i></p> <ul style="list-style-type: none"> • IIROC Rule 3110 - 3114 • National Instrument 31-103, section 13.4 • IIROC Notice 17-0093 • IIROC Notice 19-0092 	

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<p>Product</p> <p><i>Product Shelf / Recommended Product List</i></p> <ul style="list-style-type: none"> • IIROC Rules 3110 - 3114 • National Instrument 31-103, section 13.4 <p><i>Proprietary Products</i></p> <ul style="list-style-type: none"> • IIROC Rules 3110 - 3114 • National Instrument 31-103, section 13.4 <p><i>Mutual Funds</i></p> <ul style="list-style-type: none"> • IIROC Rule 3117 • National Instrument 81-105, sections 4.1 & 4.2 • National Instrument 81-105, sections 2.2, 3.1, 3.2 & 5 <p><i>Product Promotions</i></p> <ul style="list-style-type: none"> • IIROC Rules 3110 - 3114 • National Instrument 31-103, section 13.4 	
<p>Fee-Based Accounts</p> <p><i>Firm Incentives</i></p> <ul style="list-style-type: none"> • IIROC Rules 3110-3114 • IIROC Rule 3504 • IIROC Rule 3803(3) • National Instrument 31-103, section 13.4 <p><i>Assets with Embedded Commission</i></p> <ul style="list-style-type: none"> • IIROC Rules 3110-3114 • IIROC Rule 3504 • IIROC Rule 3803(3) • National Instrument 31-103, section 13.4 	

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CORPORATE FINANCE & SYNDICATION	POLICIES & PROCEDURES - MANUAL NAME & LOCATION
<p>Conflict of Interest</p> <ul style="list-style-type: none"> • IIROC Rule 3110 • National Instrument 31-103, sections 13.4 – 13.6 • National Instrument 33-105 Underwriting Conflicts • IIROC Rule 2285 	
<p>Due Diligence</p> <ul style="list-style-type: none"> • IIROC Notice 14-0299 	
<p>Containment of Material Non-Public Information</p> <p><i>Physical/Electronic Barriers, Grey List and Wall Crossing</i></p> <ul style="list-style-type: none"> • IIROC Member Regulation Notice MR-0377 • IIROC Rule 3508 • OSC Policy 33-601 • OSC Securities Act, section 76 • OSC General Regulation, Part VIII Insider Trading <p><i>Restricted List</i></p> <ul style="list-style-type: none"> • UMIR Rule 7.7 • OSC Rule 48-501 • IIROC Member Regulation Notice MR-0377 • IIROC Rules 3619 - 3622 	
<p>Communication/Marketing Materials</p> <p><i>Pre-Marketing</i></p> <ul style="list-style-type: none"> • IIROC Rule 3509 • IIROC Member Regulation Notice MR-0377 <p><i>Teach-ins and Marketing Materials</i></p> <ul style="list-style-type: none"> • IIROC Rule 3508 • OSC Policy 33-601 • IIROC Member Regulation Notice MR-0377 • IIROC Rule 3509 	
<p>Distribution/Syndication</p> <ul style="list-style-type: none"> • IIROC Rules 1404 - 1406 • IIROC Rules 3506 - 3507 • NI 41-101 General Prospectus Requirements • IIROC Member Regulation Notice MR-0279 • IIROC Member Regulation Notice MR-0377 	
<p>Prospectus Exempt Offerings / Private Placements</p> <ul style="list-style-type: none"> • NI 45-106 Prospectus Exemptions 	

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<ul style="list-style-type: none">• IIROC Rule 3507• IIROC Member Regulation Notice MR-0267• IIROC Member Regulation Notice MR-0279	
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EMPLOYEE SUPERVISION & TRAINING	POLICIES & PROCEDURES - MANUAL NAME & LOCATION
<p>Outside Business Activities</p> <ul style="list-style-type: none"> • IIROC Rule 2554 • IIROC Rule 3101(1), 3110 - 3114 • IIROC Rule 3216(5)(ii)(e) • National Instrument 31-103, section 13.4 • National Instrument 33-109, section 4.1 • IIROC Notice 13-0163 • IIROC Notice 13-0162 • Companion Policy 31-103CP, section 13.4 • CSA Staff Notice 31-326 	
<p>Employee Account at Other Dealer Members</p> <ul style="list-style-type: none"> • IIROC Rule 3900 Part A • IIROC Rule 3945 • IIROC Rule 1405 	
<p>Containment of Confidential Inside Information</p> <ul style="list-style-type: none"> • IIROC Rule 1402 • IIROC Rule 3508 • Ontario Securities Act, section 76 • Ontario Securities Act General Regulations, section 175 • IIROC Member Regulation Notice MR0377 • OSC Policy 33-601 	
<p>Suspension of Registration</p> <ul style="list-style-type: none"> • IIROC Rules 2551 & 2552 • IIROC Rule 2602 • IIROC Rule 3215(3) 	
<p>Issuance of Unofficial Statements to Clients</p> <ul style="list-style-type: none"> • IIROC Rule 3603 • IIROC Member Regulation Notice 0087 • IIROC Notice 09-0370 	
<p>Financial Planning Services</p> <ul style="list-style-type: none"> • IIROC Rules 2554, 2300, 3904 & 3603 • IIROC Notice 13-0163 • IIROC Member Regulation Notice 0239 • IIROC Member Regulation Notice 0241 	
<p>Personal Financial Dealings with Clients</p> <ul style="list-style-type: none"> • IIROC Rule 3115 • IIROC Rule 3904 • IIROC Rule 3100 Part B • National Instrument 31-103, section 13.4 	

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<ul style="list-style-type: none"> • IIROC Notice 17-0079 • IIROC Notice 13-0162 	
<p>Principal and Agent</p> <ul style="list-style-type: none"> • IIROC Rule 2300 series • IIROC Rule 2551(7) • IIROC Member Regulation Notice 0217 	
<p>Continuing Education</p> <ul style="list-style-type: none"> • IIROC Rule 2700 • IIROC Notice 17-0223 • IIROC Notice 18-0023 • IIROC Notice 19-0222 	
<p>30 and 90 Day Training</p> <ul style="list-style-type: none"> • IIROC Rule 2602 & 2553 • IIROC Rules 2627 & 2609 • IIROC Member Regulation Notice 0359 • IIROC Member Regulation Notice 0472 • IIROC Member Regulation Notice 0038 • IIROC Member Regulation Notice 0021 	
<p>AML Training</p> <ul style="list-style-type: none"> • Proceeds of Crime (Money Laundering) and Terrorist Financing Regulations, section 71 • Proceeds of Crime (Money Laundering) and Terrorist Financing Act Section 9.6(1) • FINTRAC – Compliance program requirements Section 4 • IIROC Notice 19-0201 • IIROC Notice 10-0273 	

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INSTITUTIONAL	POLICIES & PROCEDURES - MANUAL NAME & LOCATION
<p>Account Opening</p> <ul style="list-style-type: none"> • IIROC Rule 3202 • IIROC Rule 3207 • IIROC Rules 3212 - 3215 • IIROC Rule 3252(1) • IIROC Rule 3403 - 3404 • OSC 91-502 1.1, Appendix B • Proceeds of Crime (Money Laundering) and Terrorist Financing Act Sections 6 • Proceeds of Crime (Money Laundering) and Terrorist Financing Regulations • FINTRAC Guidance: Know your client requirements • FINTRAC Guidance: Record keeping requirements 	
<p>Supervision</p> <ul style="list-style-type: none"> • IIROC Rule 3401 • IIROC Rule 3403 • IIROC Rule 3404(2) • IIROC Rule 3406 • IIROC Rule 3950 • IIROC Rule 3960 • IIROC Rule 3961 • Proceeds of Crime (Money Laundering) and Terrorist Financing Regulations • Proceeds of Crime (Money Laundering) and Terrorist Financing Act Section 7 • FINTRAC Guidance: Transaction reporting requirements - Guideline 2: Suspicious Transactions • FINTRAC Guidance: Know your client requirements - Ongoing monitoring requirements 	
<p>Use of Client Brokerage Commissions (Soft Dollars)</p> <ul style="list-style-type: none"> • National Instrument 23-102 	

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ORDER-EXECUTION-ONLY	POLICIES & PROCEDURES - MANUAL NAME & LOCATION
Business Structure <ul style="list-style-type: none"> • IIROC Rule 2207 • IIROC Rule 3241 • IIROC Rule 3404 	
Account Opening – Account Appropriateness <ul style="list-style-type: none"> • IIROC Rule 3211 • IIROC Rule 3240 • IIROC Notice 18-0076 • IIROC Notice 19-0051 	
Compensation <ul style="list-style-type: none"> • IIROC Rule 2207(5) • IIROC Notice 18-0075 • IIROC Notice 18-0076 • IIROC Notice 18-0158 	
Supervision <ul style="list-style-type: none"> • IIROC Rule 3240 • IIROC Rule 3241 • IIROC Rule 3900 • IIROC Rule 3955 • IIROC Notice 12-0107 • IIROC Notice 12-0108 	
Investment Tools Available to Clients: <ul style="list-style-type: none"> • IIROC Notice 18-0075 • IIROC Notice 18-0076 	
Client Disclosures: <ul style="list-style-type: none"> • IIROC Rule 3216 • IIROC Rule 3218 • IIROC Rule 3241 • IIROC Rule 2216 • National Instrument 41-101 and its Companion Policy (CP) • National Instrument 81-101 and its Companion Policy (CP) • National Instrument 81-105 and its Companion Policy (CP) - section 8.2 	
Trading Authorization for non-registered individuals: <ul style="list-style-type: none"> • IIROC Rule 3220(1)(iii) • IIROC Rule 3220(4) • National Instrument 31-103 Part 1, 1.3(c) and (d) • Securities Act (Quebec), Section 148 	

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OTC BB MODULE: BCIN 33-705 Conditions of Registration for Investment Dealers with a BC Office that Trade in the US Over-the-Counter Markets	POLICIES & PROCEDURES - MANUAL NAME & LOCATION
Interpretation and application	
Condition 1: the conditions do not apply to dealers who provide the BCSC with an undertaking not to trade in securities of OTC issuers through a BC office for as long as the conditions are in effect.	
Risk management	
Condition 2: manage risks to trading securities of OTC issuers.	
Monitoring, recording keeping and reporting	
Condition 3: monitor, record and report data related to trading in securities of OTC issuers to the BCSC. Deposits of shares of OTC issuers, both electronic deposits and physical deliveries, made through a BC office, must be recorded and reported.	
Establishing beneficial ownership	
Condition 4: identify the beneficial owner of securities of an OTC issuer a client wants to sell	
Condition 5: determine the beneficial owner's relationship with the issuer and if applicable, how the person acquired the securities	
Responsibilities of designated persons	
Condition 6: if the dealer trades securities of an OTC issuer through a BC office, the dealer must designate an individual to manage and enforce the conditions noted in BCIN 33-705.	
Condition 7: the designated individual must be the UDP, president, CEO, COO, CCO or CFO of the dealer or an individual from the dealer who performs the functional equivalent to any of those positions	
Condition 8: the designated individual must approve, in writing, the policies and procedures implemented to comply with these conditions and confirm that those policies and procedures will ensure compliance with BCIN 33-705	
Condition 9: before accepting the physical deposit of securities of an OTC issuer through a BC office, the designated individual must approve the physical deposit. A dealer can accept other forms of transfers, i.e., electronic transfers, but cannot execute orders to sell these securities until it complies with conditions 4 and 5.	

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PRODUCT DUE DILIGENCE	POLICIES & PROCEDURES - MANUAL NAME & LOCATION
<p>IIROC does not have rules specific to product due diligence but has issued the following guidance:</p> <ul style="list-style-type: none"> a. IIROC Guidance Notice 09-0087 Best Practices for Product Due Diligence b. IIROC Guidance Notice 10-0234 New Product Due Diligence Regulatory Review – Common Deficiencies and Requirements for Written Policies, Procedures and Controls c. CSA Notice 33-315 Suitability Obligation and Know Your Product 	
<p>Additional guidance notice:</p> <ul style="list-style-type: none"> d. Study March 28, 2007: Due Diligence Guidelines on Principal Protected Notes e. IIROC Guidance Notice 10-0233 Principal Protected Notes Compliance Review: Findings, Requirements and Recommendations f. IIROC Guidance Notice 13-0039 Recommendations and Best Practices for Distribution of Non-Arm’s Length Investment Products g. IIROC Guidance Notice 16-0114 Guidance on Compliance and Supervisory Issues when Dealing with Senior Clients 	

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RESEARCH	POLICIES & PROCEDURES - MANUAL NAME & LOCATION
Supervisory Structure <ul style="list-style-type: none"> • IIROC Rule 3607 • IIROC Guidance Notice 3600-20-001(4) 	
Approval Process and Disclosure Requirements <p><i>Approval Process</i></p> <ul style="list-style-type: none"> • IIROC Rule 3603(3) • IIROC Rule 3607(2) • IIROC Rule 1201 <p><i>Disclosure Requirements</i></p> <ul style="list-style-type: none"> • IIROC Rules 3608 - 3610 • IIROC Rules 3612 - 3616 • IIROC Rule 3618 	
Research Restrictions <ul style="list-style-type: none"> • IIROC Rule 3622 • IIROC Rule 3100(B) • IIROC Notice 12-0369 • IIROC Notice 16-0124 • UMIR 7.7 • OSC Policy 33-601 • IIROC Rule 3617 • IIROC Rule 2116 	
Separation of Investment Banking and Research <ul style="list-style-type: none"> • IIROC Rule 3621 • OSC Policy 33-601 (2.4,2.5,2.6) • IIROC Member Regulation Notice MR-0377 <p><i>Wall Crossing</i></p> <ul style="list-style-type: none"> • OSC Policy 33-601 • IIROC Member Regulation Notice MR-0377 	
Employee Supervision <p><i>Personal Trading</i></p> <ul style="list-style-type: none"> • IIROC Rule 3619 • IIROC Member Regulation Notice MR-0377 • OSC Policy 33-601 • UMIR 7.7 	

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<i>Outside Business Activities</i> <ul style="list-style-type: none">• IIROC Rule 3623• IIROC Rule 3614	
Distribution of Third Party Research <ul style="list-style-type: none">• IIROC Rule 3611• IIROC Notice 12-0206• IIROC Notice 18-0195• IIROC Guidance Notice 3600-20-001(2.6)	

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RETAIL SUPERVISION	POLICIES & PROCEDURES - MANUAL NAME & LOCATION
Suitability – General <ul style="list-style-type: none"> • IIROC Rule 3402 • IIROC Rule 3406 • IIROC Rule 3948 	
Suitability – Trigger Events <ul style="list-style-type: none"> • IIROC Rule 3402(1) 	
Account Supervision <ul style="list-style-type: none"> • IIROC Rules 3925 - 3927 • IIROC Rules 3945 - 3946 • IIROC Rules 3960 – 3963 	
Pre-Trade Disclosure of Charges <ul style="list-style-type: none"> • IIROC Rule 3218 	
Discretionary Accounts <ul style="list-style-type: none"> • IIROC Rule 3221 • IIROC Rules 3273 - 3276 • IIROC Rule 3970 	
Enhanced Supervision <ul style="list-style-type: none"> • IIROC Rule 3927(3) • IIROC Rule 3947 	
Communications with Clients <ul style="list-style-type: none"> • National Instrument 31-103, section 11.5 	
Prospectus Exemptions <ul style="list-style-type: none"> • National Instrument 45-106 	
Fund Facts <ul style="list-style-type: none"> • National Instrument 81-101, section 3.2 	
Commission Rebates <ul style="list-style-type: none"> • National Instrument 81-105, section 7.1 	

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<p>Leveraged Accounts</p> <ul style="list-style-type: none">• IIROC Rule 3217• IIROC Rules 3925 – 3927• IIROC Rule 3945(1) & (2)(vii)	
<p>Delegation of Supervisory Functions</p> <ul style="list-style-type: none">• IIROC Rule 3907	

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SUPERVISION OF MANAGED ACCOUNTS	POLICIES & PROCEDURES - MANUAL NAME & LOCATION
Governance <ul style="list-style-type: none"> • IIROC Rule 3972 	
Account Opening/Operation <ul style="list-style-type: none"> • IIROC Rules 3201, 3270 - 3281 • IIROC Rule 3277 • IIROC Rule 3278 • IIROC Rule 3279 	
Supervision of Associate Portfolio Managers - Proficiency & Training <ul style="list-style-type: none"> • IIROC Rule 2553 • IIROC Rule 3971 • IIROC Rule 2600 	
Managed Account Supervision <ul style="list-style-type: none"> • IIROC Rule 3278 • IIROC Rules 3970 - 3973 	
First Tier Reviews <ul style="list-style-type: none"> • IIROC Rule 3945 	
Second Tier Reviews <ul style="list-style-type: none"> • IIROC Rule 3945 	
Non-Trading and AML Supervision <ul style="list-style-type: none"> • IIROC Rule 3402 • IIROC Rule 3945 • IIROC Rules 3202 - 3207 • Proceeds of Crime (Money Laundering) and Terrorist Financing Act & Regulations 	
Suitability <ul style="list-style-type: none"> • IIROC Rule 3926 • IIROC Rule 3100 Part B • IIROC Rule 3402 • IIROC Rule 3278 • IIROC Rules 3277 - 3278 • IIROC Rules 3201, 3270 – 3281, 3402, 3945 & 3970 - 3973 • IIROC Rule 3926 	

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<ul style="list-style-type: none">• National Instrument 31-103, section 11.1• IIROC Notices 12-0107, 12-0108 & 12-0109	
Fair Allocation <ul style="list-style-type: none">• IIROC Rule 3971• IIROC Rule 3277	
Conflicts of Interest <ul style="list-style-type: none">• IIROC Rule 3100 Part B• IIROC Rules 3971, 3280 - 3281• IIROC Notices 16-0068, 16-0297 & 17-0093	
Fee-Based Accounts <ul style="list-style-type: none">• IIROC Rule 3278• IIROC Rule 3402• IIROC Rule 3945	
Sub-Advisor Oversight <ul style="list-style-type: none">• IIROC Rule 3279	