

Attachment 3 – Summary Table of Proposed Amendments by IDPC Rule Reference

IDPC Rule Reference	Summary of Proposed Amendment
1201(2) definition of “designated Supervisor”	Revised inaccurate cross-references.
1202(2) definition of “recognized foreign self-regulatory organization”	Broadened defined term to “recognized foreign regulatory organization” to reflect current practice of recognizing self-regulatory organizations and statutory regulatory organizations.
2501(1)	Revised to reflect scope of Rule 2500 is not limited to current list of <i>Approved Persons</i> .
2502(2)(ii) and (iii)	Updated rule cross-reference and, in the English version only, correction of an incorrect term.
2503(1)(ii) and (2)	Updated rule cross-reference and, in the English version only, correction of an incorrect term.
2504(1)	Made language consistent with subsection 9206.
2505(1)(ii)	Updated rule cross-reference to be consistent with proposed changes to section 2603. Eliminated redundant language as proficiency includes both education and experience.
2505(4)(i)	Updated rule cross-references to be consistent with proposed changes to section 2603.
2506(1)(ii)	Updated rule cross-reference to be consistent with proposed changes to section 2603. Eliminated redundant language as proficiency includes both education and experience.
2506(5)(i)	Updated rule cross-reference to be consistent with proposed changes to section 2603.
2507(2)(i)	Proposed changes align with original intent and with the approach in National Instrument 31-103.
2507(4)	Clarified language to reflect intent and existing practices.
2551(1)(i) and (ii)	Eliminated reference to licensing that was inadvertently maintained with implementation of the IIROC Rules.
2551(6)	Clarified that there are more scenarios, other than ceasing to be approved by CIRO, where an <i>Approved Person</i> must immediately cease any activity requiring CIRO approval.
2552(1)	Clarified that Rule 2600 includes proficiency requirements applicable before and after CIRO approval.
2552(2) and (3)	Streamlined language for consistency with proposed changes to section 2603.
2553(2)	Formerly subsection 2553(8) moved to be located together with other requirements relating to <i>Associate Portfolio Manager</i> . No changes to language of requirement, just placement.
2553(3)	Consequential changes to subsection numbering arising from new 2553(2).
2553(4)	Clarified language for consistency with proposed changes to section 2603.
2553(5)	Updated language to distinguish post-approval from pre-approval proficiency requirements for <i>individual</i> dealing in mutual funds only.

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2553(6)	Eliminated subsection 2553(6) as information is redundant and already reflected in the table in section 2603. New subsection 2553(6) clarifies that rule application for all <i>Approved Persons</i> is not different for <i>Registered Representatives</i> and <i>Investment Representatives</i> dealing in mutual funds and is subject to the same reinstatement process.
2555(2) and (3)	Updated rule cross-reference for consistency with proposed changes to section 2603.
2602(2)	Added clarifying language.
2602(3) [preamble table]	Correcting minor typos in the description of <i>Approved Persons</i> categories.
2602(3) [column headings in table]	Streamlined language in the table’s column headings for consistency and cross-referencing to applicable requirements in section 2552 relating to pre- and post-approval.
2602(3) [section headings in table]	Adjusted section titles to refer to the singular, rather than plural, version of the category.
2602(3)(i)	Added clarifying sub-numbering and conjunctions and rule cross-references. Eliminated re-statement of baseline proficiency and replaced with cross-reference. Eliminated the reference to “supervisory reporting” to clarify that the obligation is strictly imposed on the Dealer, not the <i>Registered Representative</i> . Eliminated reference to full-time employment requirement as it is no longer a requirement under securities legislation and was inadvertently maintained with implementation of the IIROC Rules. Updated reference to proposed defined term <i>recognized foreign regulatory organization</i> .
2602(3)(ii)	Added clarifying sub-numbering and conjunctions. Updated reference to proposed defined term <i>recognized foreign regulatory organization</i> .
2602(3)(iii)	Added clarifying sub-numbering, conjunctions and cross-references. Eliminated redundant language introducing cross-reference. Cross-reference to post-approval requirements in sub-clause 2602(3)(i)(c) and six months’ supervision as set out in sub-clause 2602(3)(i)(d) are not intended to reflect new requirements in this category. These amendments are added for clarity and to align with current practice.
2602(3)(iv)	Added clarifying sub-numbering and conjunctions. Eliminated redundant language introducing cross-reference.
2602(3)(v)	Added clarifying sub-numbering, conjunctions and cross-reference. Cross-reference to six months’ supervision as set out in sub-clause 2602(3)(i)(d) is not intended to reflect new requirements in this category. This amendment is added for clarity and to align with current practice.
2602(3)(vi)	Added clarifying sub-numbering, conjunctions and cross-references. Eliminated re-statement of baseline pre-approval proficiencies, replaced with cross-reference and moved to correct column. Clarified that 270-day time period commences after initial approval date, in accordance with current practice relating to this category.

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2602(3)(vii)	Added clarifying sub-numbering and rule cross-reference. Eliminated re-statement of baseline pre-approval proficiency and replaced with cross-reference. Moved the 90-day training program requirement to the post-approval requirement column to correct its inadvertent placement in the pre-approval requirement column, consistent with the current expectation for Mutual Fund Dealer Dealing Representatives. Eliminated the reference to “supervisory reporting” to clarify that the obligation is strictly imposed on the Dealer, not the <i>Registered Representative</i> .
2602(3)(viii)	Added clarifying sub-numbering, conjunctions and rule cross-references. Eliminated re-statement of baseline proficiencies and replaced with cross-reference. Eliminated the reference to “supervisory reporting” to clarify that the obligation is strictly imposed on the Dealer, not the <i>Investment Representative</i> . Updated reference to proposed defined term <i>recognized foreign regulatory organization</i> .
2602(3)(ix)	Added clarifying sub-numbering and conjunctions. Updated reference to proposed defined term <i>recognized foreign regulatory organization</i> .
2602(3)(x)	Added clarifying sub-numbering and conjunctions. Eliminated re-statement of baseline proficiencies and replaced with cross-reference. Added cross-reference to sub-clause 2602(3)(viii)(c) for consistency with requirements of other <i>Registered Representative</i> and <i>Investment Representative</i> dealing with retail client categories.
2602(3)(xi)	Added clarifying sub-numbering and conjunctions. Eliminated redundant language introducing cross-reference.
2602(3)(xii)	Added clarifying sub-numbering and conjunctions. Added cross-reference to sub-clause 2602(3)(viii)(c) for consistency with requirements for other <i>Registered Representative</i> and <i>Investment Representative</i> dealing with retail client categories.
2602(3)(xiii)	Added clarifying sub-numbering and rule cross-references. Eliminated re-statement of baseline pre-approval proficiencies, replaced with cross-reference and moved to correct column. Clarified that the 270-day time period and 18-month time period commence after initial approval date, in accordance with current practice.
2602(3)(xiv)	Added clarifying sub-numbering and conjunctions. Eliminated redundant re-statement of pre-approval requirements and replaced with rule cross-reference.
2602(3)(xv)	Added clarifying sub-numbering and conjunctions. Eliminated redundant re-statement of pre-approval requirements and replaced with rule cross-reference.
2602(3)(xvi)	Added clarifying sub-numbering.
2602(3)(xvii)	Added clarifying sub-numbering.
2602(3)(xviii)	Added clarifying sub-numbering, conjunctions and rule cross-reference. Updated reference to proposed defined term <i>recognized foreign regulatory organization</i> .
2602(3)(xix)	Added clarifying sub-numbering and conjunctions. Eliminated reference to being “previously registered with ... an investment dealer...” that was inadvertently

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	maintained upon the implementation of the IROC Rules. Updated reference to proposed defined term <i>recognized foreign regulatory organization</i> . Added experience with Mutual Fund Dealer Member or portfolio manager as acceptable alternatives.
2602(3)(xx)	Added clarifying sub-numbering and conjunctions. Eliminated incorrect reference to being “previously registered with ... an investment dealer...” that was inadvertently maintained following implementation of the IROC Rules. Updated reference to proposed defined term <i>recognized foreign regulatory organization</i> . Added experience with Mutual Fund Dealer Member or portfolio manager as acceptable alternatives.
2602(3)(xxi)	Added clarifying sub-numbering. Aligned description of <i>Supervisor</i> with requirement relating to designated <i>Supervisor</i> in section 3925(2). Updated reference to proposed defined term <i>recognized foreign regulatory organization</i> . Added experience with Mutual Fund Dealer Member or portfolio manager as acceptable alternatives.
2602(3)(xxii)	Added clarifying sub-numbering and conjunction. Updated reference to proposed defined term <i>recognized foreign regulatory organization</i> . Added experience with Mutual Fund Dealer Member or portfolio manager as acceptable alternatives.
2602(3)(xxiii)	Added clarifying sub-numbering, conjunctions and rule cross-references. Eliminated redundant language introducing cross-reference. Aligned experience requirements with other <i>Supervisor</i> categories, including introducing the requirement to complete the Investment Dealer Supervisor Course and omitting the requirement for Supervisors of Managed Accounts to have the same Relevant Investment Management Experience as portfolio managers.
2602(3)(xxiv)	Added clarifying sub-numbering. Added experience with Mutual Fund Dealer Member or portfolio manager as acceptable alternatives. Eliminated incorrect reference to being “previously registered with ... an investment dealer...” that was inadvertently maintained following implementation of the IROC Rules. Updated reference to proposed defined term <i>recognized foreign regulatory organization</i> .
2602(3)(xxv)	Added clarifying sub-numbering and conjunctions. Corrected description of <i>futures contract</i> and <i>futures contract options accounts</i> . Added experience with Mutual Fund Dealer Member or portfolio manager as acceptable alternatives. Updated reference to proposed defined term <i>recognized foreign regulatory organization</i> . Eliminated reference to being “previously registered with ... an investment dealer...” that was inadvertently maintained following implementation of the IROC Rules.
2602(3)(xxvi)	Added clarifying sub-numbering. Recognized applicable supervisory experience at Mutual Fund Dealer Member or portfolio manager. Updated reference to proposed defined term <i>recognized foreign regulatory organization</i> .
2602(3)(xxvii)	Added clarifying sub-numbering and conjunctions. Updated reference to proposed defined term <i>recognized foreign regulatory organization</i> . Codified

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	acceptable pre-approval alternatives set out in guidance (three levels of CFA and CFA charter continue to be acceptable). These accepted alternatives are based on existing staff practice and feedback following industry committee review. Added experience with registered advisor as acceptable alternative.
2602(3)(xxviii)	Added clarifying sub-numbering and rule cross-reference. Eliminated unnecessary re-statement of proficiency requirements for other categories.
2602(3)(xxix)	Added clarifying sub-numbering and rule cross-reference. Eliminated unnecessary re-statement of proficiency requirements for other categories.
2602(3)(xxx)	Added clarifying sub-numbering. Eliminated unnecessary re-statement of proficiency requirements for other categories. In the French version only, added clarifying language regarding the financial accounting designation.
2602(3)(xxxii)	Added clarifying sub-numbering. Eliminated unnecessary re-statement of proficiency requirements for other categories.
2602(3)(xxxiii)	Added clarifying sub-numbering.
2625(1) - (3)	Streamlined language and italicized defined terms. In the French version only, corrected a typographical error.
2626(1) and (2)	Streamlined language.
2627(1)	Added clarifying sub-numbering to table. Clarified language, added missing reference to associate advising representative and updated reference to proposed defined term <i>recognized foreign regulatory organization</i> .
2628(2)-(4)	In the English version only, added “repeat” language to reflect that 30/90-day training programs are courses that cannot be re-written. Added language to clarify intent of rule.
2628(6)	Added clarifying sub-numbering to table. In the English version, added missing reference to associate advising representative. In the French version, replacement of the reference to “investment advisor” with a reference to advising representative and associate advising representative. Clarified that there is automatic exemption from rewriting not just the Derivatives Fundamentals Course but also the Derivative Fundamentals Options Licensing. Updated reference to proposed defined term <i>recognized foreign regulatory organization</i> .
2630(1)	Proposed changes to permit an individual registered as an advising representative or associate advising representative by a securities regulatory authority registered within the last 90 days, rather than within the last two weeks, to take up to three months to complete the Conduct and Practices Handbook Course.
2631(1)	Eliminated for consistency with revised proficiency transitional provisions introduced with implementation of IDPC on January 1, 2023. Transition provisions reflected removal of Conduct and Practices Handbook Course requirement for mutual funds only licensed individuals employed by a dual-registered firm.
2703(1), (5) and (6)	Added language to clarify intent of rule. Added the missing <i>Associate Portfolio Manager</i> and <i>Portfolio Manager</i> categories to the list of approval categories.

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2704(1)	Made changes to ensure language is consistent with subsection 3925(2).
2704(4) and (5)	Added clarifying cross-references.
2715(3)	Added language to clarify intent of rule.
2716(1)(i) and (ii)	Added language to clarify intent of rule.
2717(1)(i)	Clarified intent of rule that Dealers need to verify the continuing education participant’s compliance with requirements <i>within</i> the current cycle. We have observed a trend in which CE is completed and reported after the last date of the CE cycle year.
2717(1)(ii)-(viii)	Made consequential changes to sub-numbering.
2725(1) and (2)	Added language to clarify intent of rule.
2735(3)	Clarified that CE participants cannot change to another category with less onerous CE requirements to avoid completing more onerous obligations
2755(1)(i)	Added language to clarify intention of rule. We have observed a trend in which CE is completed and reported after the last date of the CE cycle year.
3947(2)(i) and (ii)	Updated reference to proposed defined term <i>recognized foreign regulatory organization</i> .