

POLICY AND PROCEDURES MANUAL – REFERENCE RESOURCE FOR EXEMPT MARKET DEALERS (INCLUDING THOSE WITH MULTIPLE REGISTRATION CATEGORIES)

Effective date: September 20, 2022¹

NOTE: *This document is intended to provide firms with helpful information about securities law and policies. It is not intended to provide legal or other professional advice. Readers are urged to consult with their own professional advisers before taking action based on any information appearing in this document. The information contained in this document is believed to be accurate and complete at the time of publication.*

Definitions:

CCO – Chief Compliance Officer

UDP – Ultimate Designated Person

NI – National Instrument

CP – Companion Policy

KYC – Know Your Client

KYP – Know Your Product

Notes:

The policy and procedures manual should reflect the firm’s policies and procedures tailored to its business covering the areas listed below, and any other areas of securities law and guidance that may apply to the firm. Procedures should include information about who does what when, including delegation of authority during absences.

If the registrant (applicant) does not engage in or allow a certain kind of activity covered by the law or guidance, the policy should be a simple statement to that effect; for example “No leveraged trades are permitted.”

All procedures should be detailed enough to inform the registrant’s (applicant’s) staff of their duties and responsibilities.

The PPM should be dated, and each amendment should be dated, such that the reader knows how current the PPM is, and when new obligations were effective. Keeping a log of amendments is a useful reference document.

All national instruments and related companion policies can be found at [Alberta Securities Commission/Securities Law & Policy/Regulatory Instruments](#)

The September 20, 2022 update includes references to the “Client Focused Reforms” to NI 31-103 *Registration Requirements, Exemptions and Ongoing Registrant Obligations (NI 31-103)* and its

¹ This document will be updated periodically. In the interim, please review [Regulatory Updates](#). See Appendix I for tracking of updates since initial publication June 12, 2019 – Update 1 and Update 2.

associated CP (the **Client Focused Reforms, or CFRs²**). In particular, the update includes references to amendments concerning conflicts of interest, which came into effect on June 30, 2021, and to new requirements concerning KYC, KYP, suitability, relationship disclosure information, and misleading communications, which came into effect on December 31, 2021. The update also includes references to the guidance published by the Canadian Securities Administrators (CSA), the Investment Industry Regulatory Organization of Canada and the Mutual Fund Dealers Association of Canada related to the Client Focused Reforms in the form of Frequently Asked Questions.

In addition, the September 20, 2022 update includes references related to amendments to NI 31-103 to enhance protection of older and vulnerable clients through introduction of requirements related to trusted contact persons and temporary holds, which came into effect on December 31, 2021.

TOPIC & REFERENCE	POLICIES & PROCEDURES MANUAL LOCATION
<p>Framework references</p> <ul style="list-style-type: none"> • Rules giving rise to the need for a policy and procedures manual <ul style="list-style-type: none"> ◦ NI 31-103 S.11.1 <i>Compliance System</i> & CP guidance • Overarching duty of care <ul style="list-style-type: none"> ◦ Act S.75.2 <i>Duty of Care</i> 	
<p>Description of roles and responsibilities of the UDP & CCO</p> <ul style="list-style-type: none"> • UDP: NI 31-103, S.5.1, S.11.2, S.11.4 & CP • CCO: NI 31-103, S.5.2, S.11.3, S.11.4 & CP • ASC Registrant Outreach and Education Seminars – Spring 2017 – EMD Compliance for CCOs • ASC Notice 33-705 <i>Review of Exempt Market Dealers (ASC Notice 33-705)</i> • CSA Staff Notice 31-358 <i>Guidance on Registration Requirements for Chief Compliance Officers and Request for Comments</i> 	
<p>Know your client and trusted contact person</p> <ul style="list-style-type: none"> • NI 31-103, S. 1 (definition of “trusted contact person”), S.13.2, S.13.2.01, S.13.3.1 & CP, Appendix G of CP, and Client Focused Reforms Client Focused Reforms Frequently Asked Questions • NI 45-106, Division 1: Capital Raising exemptions ; CP S.1.9 <i>Responsibility for compliance and verifying purchaser status</i> 	

² For detailed information about the Client Focused Reforms, please visit the ASC’s website at the following link: <https://www.asc.ca/en/registrant-and-market-regulation/registrant-toolkit/cfr-implementation>.

<ul style="list-style-type: none"> • CSA Staff Notice 31-336 <i>Guidance for Portfolio Managers, Exempt Market Dealers and Other Registrants on the Know-Your-Client, Know-Your-Product and Suitability Obligations (CSA Staff Notice 31-336)</i> • ASC Notice 33-705 • ASC Notice 31-701 <i>Account Opening Assistance</i> • CSA Staff Notice 31-354 <i>Suggested Practices for Engaging with Older or Vulnerable Clients (CSA Staff Notice 31-354)</i> • FINTRAC: Anti money laundering expectations of registrants • Proceeds of Crime (Money Laundering) and Terrorist Financing Act Part 1, s. 5 & 6.1 • ASC Registrant Outreach and Education Seminars – 2019 – Engaging with older and vulnerable clients • ASC Registrant Outreach and Education Seminars – 2022 – Client Focused Reforms 	
<p>Know your product</p> <ul style="list-style-type: none"> • NI 31-103, S.3.4(1), 13.2.1 & CP and Client Focused Reforms Client Focused Reforms Frequently Asked Questions • CSA Staff Notice 31-336 • CSA Staff Notice 33-315 <i>Suitability Obligation and Know Your Product (CSA Staff Notice 33-315)</i> • ASC Notice 33-705 • IIROC Notice 14-0299 <i>Guidance respecting underwriting due diligence</i> • ASC Registrant Outreach and Education Seminars – Spring 2018 – Know-Your-Product – Issues • ASC Registrant Outreach and Education Seminars – 2013 – Product Due Diligence in the Exempt Market • ASC Registrant Outreach and Education Seminars – 2019 – Valuation-the real risk to mortgage fund investors • ASC Registrant Outreach and Education Seminars – 2022 – Client Focused Reforms 	
<p>Suitability</p> <ul style="list-style-type: none"> • NI 31-103, S.13.3, S.13.3.1 & CP and Client Focused Reforms Client Focused Reforms Frequently Asked Questions • CSA Staff Notice 31-336 • CSA Staff Notice 33-315 • ASC Notice 33-705 • CSA Staff Notice 31-354 • ASC Registrant Outreach and Education Seminars – 2019 – Engaging with older and vulnerable clients • ASC Registrant Outreach and Education Seminars – 2022 – Client Focused Reforms 	

<p>Permitted clients</p> <ul style="list-style-type: none"> NI 31-103, S.1.1 (definition of “permitted client”), S.13.2(5), S.13.3(3), S.13.13.1; S. 13.13(2), S.13.16(8); S.14.2(6); S.14.2.1(2); S.14.4(3); S.14.5.2(7)(d); S.14.14.1(6); S.14.14.2(6); S.14.17(5); S.14.18(5)(c) & CP 	
<p>Temporary Holds</p> <ul style="list-style-type: none"> NI 31-103, S.1.1 (definitions of “financial exploitation,” “temporary hold,” and “vulnerable client”), and S.13.19 & CP and Appendix G of CP CSA Staff Notice 31-354 	
<p>Conflicts of interest</p> <ul style="list-style-type: none"> NI 31-103, Part 13 Division 2 & CP and Client Focused Reforms Client Focused Reforms Frequently Asked Questions NI 33-105 <i>Underwriting Conflicts & CP</i> CSA Staff Notice 31-343 <i>Conflicts of Interest in Distributing Securities of Related or Connected Issuers</i> CSA Staff Notice 33-318 <i>Review of Practices Firms Use to Compensate and Provide Incentives to their Representatives</i> ASC Notice 33-705 ASC Registrant Outreach and Education Seminars – Fall 2017 – Conflicts of Interest ASC Registrant Outreach and Education Seminars – 2020 – Exempt Market Dealer Sales Practices ASC Registrant Outreach and Education Seminars – 2022 – Client Focused Reforms 	
<p>Complaints</p> <ul style="list-style-type: none"> NI 31-103, S. 11.5 and Part 13 Division 5 & CP CSA Staff Notice 31-338 <i>Guidance on Dispute Resolution Services Client Disclosure for Registered Dealers and Advisers that are not Members of a Self-Regulatory Organization</i> CSA Staff Notice 31-351 <i>IIROC Notice 17-0229, MFDA Bulletin #0736-M Complying with requirements regarding the Ombudsman for Banking Services and Investments</i> CSA Staff Notice 31-354 OBSI Joint Regulators Committee Annual Reports for 2014 through 2020 and related CSA Staff Notices 31-340; 344; 348; 353; 355; 359; 361 ASC Notice 33-705 ASC Registrant Outreach and Education Seminars – 2014 – CSA Staff Notice 31-338 ASC Registrant Outreach and Education Seminars – 2019 – Engaging with older and vulnerable clients ASC Registrant Outreach and Education Seminars – 2019 – Supervision and training of ARs and DRs 	

<p>Restriction on lending to or borrowing from clients</p> <ul style="list-style-type: none"> • NI 31-103, S.13.12 & CP and Client Focused Reforms 	
<p>Disclosure when recommending leverage</p> <ul style="list-style-type: none"> • NI 31-103, S.13.13, S.14.2(d) & CP 	
<p>Marketing</p> <ul style="list-style-type: none"> • Act S.92 <i>Prohibited Transaction</i>; S.93 <i>Prohibited Transaction</i>; S.100 <i>Representation or holding out of registration</i>; S.101 <i>Representations</i> • NI 45-106 S.1.1 and S.2.9(5.2) <i>Offering Memorandum</i> & CP 45-106 S.1.2, S.1.10, S.3.3, S.3.3.1 • CSA Staff Notice 31-325 <i>Marketing Practices of Portfolio Managers</i> • CSA Staff Notice 33-321 <i>Cyber Security and Social Media (CSA Staff Notice 33-321)</i> • Joint CSA/IROC Staff Notice 21-330 <i>Guidance for Crypto-Trading Platforms: Requirements relating to Advertising, Marketing and Social Media Use</i> • ASC Notice 33-705 • ASC Registrant Outreach and Education Seminars – Fall 2017 – Marketing • ASC Registrant Outreach and Education Seminars – 2020 – Exempt Market Dealer Sales Practices 	
<p>Titles</p> <ul style="list-style-type: none"> • NI 31-103, S.13.18 & CP • Client Focused Reforms Frequently Asked Questions • ASC Registrant Outreach and Education Seminars – 2022 – Client Focused Reforms 	
<p>Referral arrangements</p> <ul style="list-style-type: none"> • NI 31-103, S.11.5, S.13.4, and Part 13 Division 3 & CP and Client Focused Reforms • Client Focused Reforms Frequently Asked Questions • ASC Notice 33-705 	
<p>Disclosure to clients</p> <ul style="list-style-type: none"> • Relationship disclosure information NI 31-103, S.13.4(4), S.13.4(5), S.13.6, S.14.2, S.14.2.1 & CP and Client Focused Reforms • Client Focused Reforms Frequently Asked Questions • Fair allocation NI 31-103, S.14.3 • Relationship with financial institutions NI 31-103, S.14.4 & CP • Non-resident registrants NI 31-103, S.14.5 & CP • Act S.94, S.97, and S.98 • CSA Staff Notice 31-334 <i>CSA Review of Relationship disclosure Practices</i> • ASC Notice 33-705 	

<ul style="list-style-type: none"> • ASC Registrant Outreach and Education Seminars – 2013 – Relationship Disclosure Information • ASC Registrant Outreach and Education Seminars – 2019 – Valuation-the real risk to mortgage fund investors • ASC Registrant Outreach and Education Seminars – 2020 – Relationship Disclosure Information • ASC Registrant Outreach and Education Seminars – 2020 – Exempt Market Dealer Sales Practices • ASC Registrant Outreach and Education Seminars – 2022 – Client Focused Reforms 	
<p>Custody</p> <ul style="list-style-type: none"> • NI 31-103, Part 14 Division 3 & CP • CSA Staff Notice 31-347 <i>Guidance for Portfolio Managers for Service Arrangements with IIROC Dealer Members (CSA Staff Notice 31-347)</i> 	
<p>Fair allocation</p> <ul style="list-style-type: none"> • NI 31-103, S.13.4, S. 14.3, S.14.10 & CP • ASC Notice 33-705 • See Disclosure to Clients above 	
<p>Reporting to clients</p> <ul style="list-style-type: none"> • Determining market value NI 31-103, S.14.11.1 & CP • Trade confirmations NI 31-103, S.14.12, S.14.13 & CP • Account statements NI 31-103, S.14.14, S.14.14.1, S.14.14.2, S.14.15 & CP; • Report on charges and other compensation NI 31-103, S.14.17, S.14.20 & CP • Investment performance report NI 31-103, S.14.18, S.14.19, S.14.20 & CP • CSA Staff Notice 31-345 <i>Cost Disclosure, Performance Reporting and Client Statements Frequently Asked Questions and Additional Guidance</i> • CSA Staff Notice 31-347 • ASC Notice 33-705 • ASC Registrant Outreach and Education Seminars – Spring 2017 – Client Reporting • ASC Registrant Outreach and Education Seminars – Spring 2018 – Performance Reporting Basics • ASC Registrant Outreach and Education Seminars – 2013 – CRM2 - Cost and Performance Reporting Requirements 	
<p>Supervision and training of registered employees</p> <ul style="list-style-type: none"> • NI 31-103, S. 3.4(1), S.5.1, S.5.2, S.11.1, S.11.5 & CP and Client Focused Reforms • Client Focused Reforms Frequently Asked Questions 	

<ul style="list-style-type: none"> • CSA Staff Notice 31-349 <i>Change to Standard Form Reports for Close Supervision and Strict Supervision Terms and Conditions (CSA Staff Notice 31-349)</i> • ASC Notice 33-705 • CSA Staff Notice 31-354 • ASC Registrant Outreach and Education Seminars – 2019 – Supervision and training of ARs and DRs • ASC Registrant Outreach and Education Seminars – 2019 – Engaging with older and vulnerable clients 	
<p>Books and records</p> <ul style="list-style-type: none"> • NI 31-103, Part 11 Division 2 & CP • Off-book transactions – NI 31-103, S.11.5(1)(a); S.11.5(2)(g) & (h); reference can be made to IIROC Member Regulation Notice 0481, July 13, 2007 for relevant, high level concepts in this area (specifics – e.g. specific accounting for the transaction may not be applicable) 	
<p>Financial condition</p> <ul style="list-style-type: none"> • NI 31-103 Part 12 & CP <ul style="list-style-type: none"> ○ Division 1 – Working capital; NI 31-103 Appendix B Subordination Agreement, 31-103F1 ○ Division 2 – Insurance; NI 31-103 Appendix A Bonding and Insurance Clauses ○ Division 4 – Financial reporting • ASC Registrant Outreach and Education Seminars – Fall 2018 – Financial Compliance • ASC Registrant Outreach and Education Seminars – 2014 – Late Filings 	
<p>Portfolio Managers & Investment Fund Managers</p> <ul style="list-style-type: none"> • Reporting to clients/investors – see Reporting to clients above for portfolio managers, and NI 31-103, S.14.15 (IFM) • Net Asset Value Adjustments (IFM) NI 31-103, S.12.14, 31-103F4 • NI 31-103, S.13.5 • Duty to provide information (IFM) NI 31-103, S.14.1.1 & CP • Fair allocation NI 31-103, S.13.4, S.14.3, and S.14.10 & CP • IFM activities Multilateral Policy 31-202 <i>Registration Requirement for Investment Fund Managers</i> • CSA Staff Notice 31-342 <i>Guidance for Portfolio Managers Regarding Online Advice</i> • CSA Staff Notice 31-347 • CSA Staff Notice 81-333 <i>Guidance on Effective Liquidity Risk Management for Investment Funds</i> • ASC Registrant Outreach and Education Seminars – Fall 2017 – PM and IFM Select Issues 	

<ul style="list-style-type: none"> • ASC Registrant Outreach and Education Seminars – 2019 – Valuation- the real risk to mortgage fund investors • ASC Website – Client Relationship Manager Advising Representatives: Information and Resources 	
<p>National Registration Database (NRD) and other Registration Matters</p> <ul style="list-style-type: none"> • NI 33-109 <i>Registration Information & CP</i> • CSA Staff Notice 31-349 • CSA Staff Notice 31-352 <i>Monthly Suppression of Terrorism and Canadian Sanctions Reporting Obligations</i> • CSA Staff Notice 33-320 <i>The Requirement for True and Complete Applications for Registration</i> 	
<p>Cybersecurity and Business Continuity Planning</p> <ul style="list-style-type: none"> • CSA Staff Notice 33-321 • ASC Registrant Outreach and Education Seminars – Spring 2018 – Cyber Security • ASC Registrant Outreach and Education Seminars – Spring 2018 – Cyber Security & Alberta Organizations • Cybersecurity Best Practices Guide for IIROC Dealer Members, IIROC & Juno Security 	
<p>Compliance system, designation of supervisory personnel, and supervision of business locations:</p> <ul style="list-style-type: none"> • NI 31-103, Part 11, Division 1 Compliance and Division 2 Books and Records • Part 11, Division 1 Compliance of CP • CSA Staff Notice 31-350 <i>Guidance on Small Firms Compliance and Regulatory Obligations</i> 	
<p>Outsourcing – guidance in CP:</p> <ul style="list-style-type: none"> • Part 11 Internal Controls and Systems • Part 14, Division 5 Reporting to Clients 	
<p>General</p> <ul style="list-style-type: none"> • Restriction on acting for another registered firm NI 31-103, S.4.1 & CP • Mortgage Investment Entities – CSA Staff Notice 31-323 <i>Guidance Relating to the Registration Obligations of Mortgage Investment Entities</i> • ASC Notice 33-705 • ASC Rule 72-501 <i>Distributions to Purchasers Outside Alberta (S.7.) & CP to ASC Rule 72-501</i> • CSA Staff Notice 31-354 • CSA Staff Notice 31-356 <i>Guidance on Compliance Consultants Engaged by Firms Following a Regulatory Decision</i> • Joint CSA/IIROC Staff Notice 21-329 <i>Guidance for Crypto-Asset Trading Platforms: Compliance with Regulatory Requirements</i> • ASC Registrant Outreach and Education Seminars – 2022 – Client Focused Reforms 	

<ul style="list-style-type: none"> • ASC Registrant Outreach and Education Seminars – 2020 – Common Findings from Compliance Reviews: PM/IFM and EMD • ASC Registrant Outreach and Education Seminars – 2019 – Engaging with older and vulnerable clients • ASC Registrant Outreach and Education Seminars – Spring 2017 – ASC Exempt Market Dealer Sweep • ASC Registrant Outreach and Education Seminars – Fall 2018 – Navigating an ASC Compliance Review • ASC Registrant Outreach and Education Seminars – Fall 2018 – The Manual • ASC Registrant Outreach and Education Seminars – 2013 – Preparing for an ASC Compliance Review • Privacy obligations - The <i>Freedom of Information and Protection of Privacy Act</i>, Revised Statutes of Alberta 2000 Chapter F-25 (the FOIP Act) • ASC Website – Client Focused Reforms: Information and Resources • CSA Website – Client Focused Reforms • Electronic Signatures: Variation of ASC Blanket Order 13-503 <i>re: Temporary Exemption from Requirements to Manually Sign Documents</i> (Effective to April 30, 2023) • Self-Certified Investors Prospectus Exemption: Variation of ASC Blanket Order 45-538 <i>re: Self-Certified Investor Prospectus Exemption</i> (Effective to April 1, 2024) • Small Business Financing: ASC Blanket Order 45-539 <i>re: Small Business Financing</i> (Effective to September 1, 2024) • September 17, 2020 CSA Notice of Amendments to National Instrument 45-106 Prospectus Exemptions and National Instrument 31-103 <i>Registration Requirements, Exemptions and Ongoing Registrant Obligations</i> and Changes to related Companion Policies relating to Syndicated Mortgages and Issuers Engaged in Real Estate Activities • April 28, 2022 CSA and CCIR Joint Notice and Request for Comment <i>Total Cost Reporting for Investment Funds and Segregated Funds</i> 	
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APPENDIX I

Update 2 – September 20, 2022

Consolidated and updated references throughout the document

Client Focused Reforms

- Updated references related to sections 11.1, 11.5, 13.2, 13.3, 13.4, 13.12, 14.2, 14.2.1 of NI 31-103 and 31-103CP
- Added references to new sections 13.2.1, 13.3.1, 13.18 of NI 31-103 and 31-103CP

Trusted Contact Person and Temporary Holds

- Added “Temporary Holds” section to the table
- Added references to new sections 13.2.01 and 13.19 of NI 31-103, and Appendix G of 31-103CP

Consolidated the “Designation of supervisory personnel” and “Review of business locations’ compliance activity” sections into a single “Compliance system, designation of supervisory personnel, and supervision of business locations” section of the table

Added the “Outsourcing” section to the table

August 5, 2021 CSA Staff Notice 31-361 *OBSI Joint Regulators Committee Annual Report for 2020*

Joint CSA/IIROC Staff Notice 21-329 *Guidance for Crypto-Asset Trading Platforms: Compliance with Regulatory Requirements*

Joint CSA/IIROC Staff Notice 21-330 *Guidance for Crypto-Trading Platforms: Requirements relating to Advertising, Marketing and Social Media Use*

CSA Staff Notice 81-333 *Guidance on Effective Liquidity Risk Management for Investment Funds*

ASC Rule 72-501 *Distributions to Purchasers Outside Alberta & Companion Policy to ASC Rule 72-501*

Electronic Signatures: Variation of ASC Blanket Order 13-503 *re: Temporary Exemption from Requirements to Manually Sign Documents* (Effective to April 30, 2023)

Self-Certified Investors Prospectus Exemption: Variation of ASC Blanket Order 45-538 *re: Self-Certified Investor Prospectus Exemption* (Effective to April 1, 2024)

Small Business Financing: ASC Blanket Order 45-539 *re: Small Business Financing* (Effective to September 1, 2024)

September 17, 2020 CSA Notice of Amendments to National Instrument 45-106 Prospectus Exemptions and National Instrument 31-103 *Registration Requirements, Exemptions and Ongoing Registrant Obligations* and Changes to related Companion Policies relating to Syndicated Mortgages and Issuers Engaged in Real Estate Activities

April 28, 2022 CSA and CCIR Joint Notice and Request for Comment *Total Cost Reporting for Investment Funds and Segregated Funds*

ASC Registrant Outreach and Education Seminars – Spring 2018 – [Cyber Security & Alberta Organizations](#)

ASC Registrant Outreach and Education Seminars – 2022 – [Client Focused Reforms](#)

Update 1 – December 9, 2020

Added Titles section to the table

Client Focused Reforms

- October 3, 2019 CSA Notice of Amendments to National Instrument 31-103 *Registration Requirements, Exemptions and Ongoing Registrant Obligations* and to Companion Policy 31-103CP *Registration Requirements, Exemptions and Ongoing Registrant Obligations* (**Client Focused Reforms**)
- ASC Blanket Order 31-533 *Temporary Exemption from Client Focused Reforms Conflict of Interest Provisions of National Instrument 31-103 Registration Requirements, Exemptions and Ongoing Registrant Obligations*
- ASC Website - [Client Focused Reforms: Information and Resources](#)
- CSA Website – [Client Focused Reforms](#)

June 21, 2019 - CSA Staff Notice 31-354 *Suggested Practices for Engaging with Older or Vulnerable Clients*

August 15, 2019 CSA Staff Notice 31-355 *OBSI Joint Regulators Committee Annual Report for 2018*

August 22, 2019 CSA Staff Notice 31-356 *Guidance on Compliance Consultants Engaged by Firms Following a Regulatory Decision*

Electronic Signatures: Alberta Securities Commission Blanket Order 13-503 *re: Temporary Exemption from Requirements to Manually Sign Documents* (Effective to April 30, 2021)

July 2, 2020 CSA Staff Notice 31-358 *Guidance on Registration Requirements for Chief Compliance Officers and Request for Comments*

August 6, 2020 CSA Notice of Amendments to National Instrument 45-106 Prospectus Exemptions and National Instrument 31-103 *Registration Requirements, Exemptions and Ongoing Registrant Obligations* and Changes to related Companion Policies relating to Syndicated Mortgages

August 27, 2020 CSA Staff Notice 31-359 *OBSI Joint Regulators Committee Annual Report for 2019*

ASC Website – [Client Relationship Manager Advising Representatives: Information and Resources](#) - content launched November 2020

ASC Registrant Outreach and Education Seminars – 2020 – [Relationship Disclosure Information](#)

ASC Registrant Outreach and Education Seminars – 2020 – [Exempt Market Dealer Sales Practices](#)

ASC Registrant Outreach and Education Seminars – 2020 – [Common Findings from Compliance Reviews: PM/IFM and EMD](#)

CSA Staff Notice 31-334 *CSA Review of Relationship Disclosure Practices*