



Canadian Securities
Administrators

Autorités canadiennes
en valeurs mobilières



YEAR OF REPORT 2025

CSA STAFF NOTICE 25-315

2025 Annual Activities Report on the Oversight of the
Canadian Investment Regulatory Organization and the
Canadian Investor Protection Fund

April 2, 2026



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HIGHLIGHTS

236

Firms

111,566

*Approved
Persons*

6.1 Trillion

Assets Under Administration



*10 Rules in
Progress*



*8 Rules
Approved*



*12 Financials
Filed*



*60 Materials
Filed*

WHO WE ARE

The Canadian Securities Administrators (**CSA**) is the council of Canada's provincial and territorial securities regulators. Its objective is to improve, coordinate and harmonize regulation of the Canadian capital markets to ensure the smooth operation of Canada's securities industry and protect investors.

The securities regulatory authorities (**CSA Members**) in all thirteen provinces and territories have recognized the Canadian Investment Regulatory Organization (**CIRO**)¹ and approved/accepted the Canadian Investor Protection Fund (**CIPF**)².

Acronym	Name of CSA Members
AMF	Autorité des marchés financiers
ASC	Alberta Securities Commission
BCSC	British Columbia Securities Commission
FCAA	Financial and Consumer Affairs Authority of Saskatchewan
FCNB	Financial and Consumer Services Commission of New Brunswick
MSC	The Manitoba Securities Commission
NL	Office of the Superintendent of Securities Service Newfoundland and Labrador
NSSC	Nova Scotia Securities Commission
NT	Office of the Superintendent of Securities, Northwest Territories
NU	Office of the Superintendent of Securities, Nunavut Office
OSC	Ontario Securities Commission
PEI	Prince Edward Island, Financial and Consumer Services Division
YT	Office of the Yukon Superintendent of Securities

¹ Each province and territory issues a [recognition order](#) (**Recognition Order**) pursuant to applicable legislation providing a securities regulator with the power to recognize a self-regulatory organization or entity responsible for regulating the operations and the standards of practice and business conduct of investment dealers and mutual fund dealers (**SRO**). CIRO is the SRO, which operates as a successor to the Investment Industry Regulatory Organization of Canada (**IIROC**) and the Mutual Fund Dealers Association of Canada (**MFDA**). IIROC and the MFDA amalgamated to continue as the New Self-Regulatory Organization of Canada (**New SRO**), on January 1, 2023, which subsequently changed its name to CIRO on June 1, 2023.

² An investor protection fund (**IPF**) may compensate investors for financial losses in respect of property held in their account caused solely by the insolvency of an investment dealer or mutual fund dealer. There is currently one approved/accepted IPF, CIPF formed through the amalgamation of two protection funds, the former Canadian Investor Protection Fund and the MFDA Investor Protection Corporation, on January 1, 2023. Analogous to the recognition of CIRO, CIPF has been approved/accepted through [approval orders](#) (**Approval Orders**).

EXECUTIVE SUMMARY

We are pleased to share CSA Staff Notice 25-315 *2025 Annual Activities Report on the Oversight of Canadian Investment Regulatory Organization and Canadian Investor Protection Fund (Report)* summarizing the key activities through which we conduct oversight of CIRO and CIPF.

This Report covers the period of January 1 – December 31, 2025 (the **Reporting Period**).

During the Reporting Period we addressed a variety of matters, some relating to CIRO's amalgamation³. Key matters considered during the Reporting Period include the:

- consolidation of rules applicable to investment dealers and mutual fund dealers;
- delegation of the registration of investment dealers and mutual fund dealers and the individuals who act on their behalf by multiple jurisdictions, to CIRO and operationalization of the delegated registration functions and powers;
- review of amendments to the Approved Persons Fees Component within the Annual Fee of the Dealer Member Fee Model for investment dealers and mutual fund dealers;
- oversight of the CIRO cybersecurity breach; and
- approval and implementation of the CIRO proficiency model for investment dealers.

Key matters considered during the period specific to CIPF include the:

- review of CIPF's continuing efforts to integrate its two funds that provide coverage to eligible customers of CIRO investment dealers and mutual fund dealers;
- oversight of CIPF's alignment of the investment policies and strategies of the two funds; and
- consideration of whether it is appropriate for both funds to use the credit-risk based fund model which assists in setting fund size.

In addition to these key matters, CSA Members also conducted continuing regular oversight which includes our review of amendments to CIRO rules and CIPF policies, review of required filings from CIRO and CIPF, completion of the CSA's 2025 Oversight Review⁴ of specific processes in three functional areas of CIRO and the substantial completion of the CSA's 2025 Oversight Review of specific processes in two functional areas of CIPF. Post-close initiatives will continue to be an area of focus in 2026.

This Report is an important tool for engaging with stakeholders. The objectives of this Report are to provide transparency, foster public confidence in the regulatory framework, and explain our role in overseeing CIRO's and CIPF's compliance with securities regulation. We welcome any questions or feedback that you may have.

Outlined in [Appendix A](#) is an overview of how we regulate CIRO and CIPF, while [Appendix B](#) describes the oversight functions and activities undertaken for the CIRO and CIPF oversight programs, including: the annual risk assessments, oversight reviews, reviews of proposed rules, reviews of materials filed, and meetings.

³ A number of these matters relates to the amalgamation of IIROC and MFDA as described in the CSA Position Paper 25-404 [New Self-Regulatory Organization Framework](#) published on August 3, 2021.

⁴ The CSA's 2025 [Oversight Review](#) of CIRO was issued on July 23, 2025.

POST-CLOSE INITIATIVES

During the Reporting Period, work continued on various solutions outlined in CSA Position Paper 25-404 [New Self-Regulatory Organization Framework](#) (the **Position Paper**), as set out below.

HIGH
PRIORITY

- Incorporated Advisor (formerly Directed Commissions)
- CIRO Rulebook Consolidation
- CIRO/CIPF New Cooperative Operating Agreement

MEDIUM
PRIORITY

- Dual Registration Applications, Policy Matters and Exemptions
- CIRO Enforcement Practices
- Strengthening Proficiency

COMPLETE

- Integrated Fee Model

	Post-close Initiative	Priority / Status	Scope
1.	Incorporated Advisor (formerly Directed Commissions)	High	<ul style="list-style-type: none"> • CIRO published an Update on the Project to Develop Rule Amendments Relating of the Proposed Adoption of an Incorporated Advisor Compensation Option on October 29, 2025 providing information to the public on project work performed to date. • CSA members are monitoring steps that CIRO is taking to harmonize compensation options between investment fund dealing representatives and mutual fund dealing-representatives, including CIRO’s update to the market on October 29, 2025, and CIRO’s communications with the Canada Revenue Agency. • CIRO published a Position Paper on January 25, 2024 requesting public comments on its proposed approaches.

	Post-close Initiative	Priority / Status	Scope
2.	CIRO Rulebook Consolidation	High	<ul style="list-style-type: none"> CSA Members are reviewing CIRO's proposed Dealer and Consolidated Rules (the DC Rules) to consolidate and harmonize the rulebooks for investment dealers and mutual fund dealers over five phases. The entirety of the five phases will be republished for comment in 2026. The DC Rules would replace the current Investment Dealer and Partially Consolidated (IDPC) Rules and Mutual Fund Dealer (MFD) Rules.
3.	CIRO/CIPF New Cooperative Operating Agreement	High	<ul style="list-style-type: none"> In 2022, the predecessor SROs and IPFs entered into a Transitional Agreement, that came into effect on January 1, 2023, designed to ensure that existing arrangements between the predecessor entities would continue to govern the relationship between CIRO and CIPF. CSA Members continue to oversee the development of the new Cooperative Operating Agreement which will replace the current Transitional Agreement.
4.	Dual Registration Applications, Policy Matters and Exemptions	Medium	<ul style="list-style-type: none"> CSA Members continue to consider dual registration matters and whether there are any potential challenges associated with these applications. CSA Members and CIRO staff are discussing novel issues related to the dual registration of investment dealers and mutual fund dealers.
5.	CIRO Enforcement Practices	Medium	<ul style="list-style-type: none"> Effective February 24, 2025, mutual fund dealers transitioned to the Complaints and Settlement Reporting System (ComSet) for reporting all events prescribed in MFD Rule 600. ComSet is already used by investment dealers. CIRO applied for use of the Restricted Fund for the purposes of the Disgorgement Distribution Program. The Disgorgement Distribution Program is expected to launch on April 1, 2026. MFD Rule amendments to align the disgorgement provision with the IDPC Rules are in progress. Ontario joined six other provinces⁵ in granting CIRO full enforcement powers. Specifically, the ability to collect fines, collect and present evidence and statutory immunity for CIRO.

⁵ Alberta, Québec, Newfoundland and Labrador, Prince Edward Island, Nova Scotia and New Brunswick.

	Post-close Initiative	Priority / Status	Scope
6.	Strengthening Proficiency	Medium	<ul style="list-style-type: none"> • CIRO is midway through a multiphase consultation process to harmonize the investment dealer and mutual fund dealer Continuing Education (CE) programs. • CIRO obtained approval from CSA Members for the new proficiency model for Approved Persons under the IDPC Rules. The new proficiency model took effect on January 1, 2026.
7.	Integrated Fee Model	Complete	<ul style="list-style-type: none"> • CSA Members approved CIRO's new integrated fee model that applies to both investment dealer and mutual fund dealer members. The new integrated fee model took effect on April 1, 2025.

WHO WE REGULATE



(A) CIRO

(i) Regulatory Status

CSA Members have given CIRO, as an SRO, the responsibility to govern the operations and business conduct of investment dealers and mutual fund dealers and their representatives, and the trading activity on members of CIRO that are marketplaces. The authority of CIRO to carry out certain regulatory functions is set out in the Recognition Orders, along with the terms and conditions that CIRO is required to comply with in carrying out its regulatory functions.

(ii) Member Firm Statistics

	December 31, 2025	December 31, 2024	% Change
Assets Under Administration	\$6.1 Trillion	\$5.3 Trillion	15.1%
Approved Persons	111,566	107,772	3.5%
Firms			
Investment Dealer	147 ⁷	161	
Mutual Fund Dealer	77	80	
Dual Registered ⁶	<u>12</u>	<u>8</u>	
Total	236 ⁸	249	-5.2%

The increase in CIRO's assets under administration was mainly attributable to an increase in equity markets during the Reporting Period.

⁶ A dual registered firm is a firm that is registered as both an investment dealer and a mutual fund dealer.

⁷ Within the 147 investment dealers are 5 crypto-asset trading platforms.

⁸ The total does not include the 14 Québec "deemed members" that are not subject, during the transition phase, to CIRO's rules and continue to be subject to the regulatory framework applicable in Québec, including National Instrument 31-103 *Registration Requirements, Exemptions and Ongoing Registrant Obligations*.

(iii) Member Firms by Head Office Location

The following diagram represents the distribution of 236 member firms by head office location.

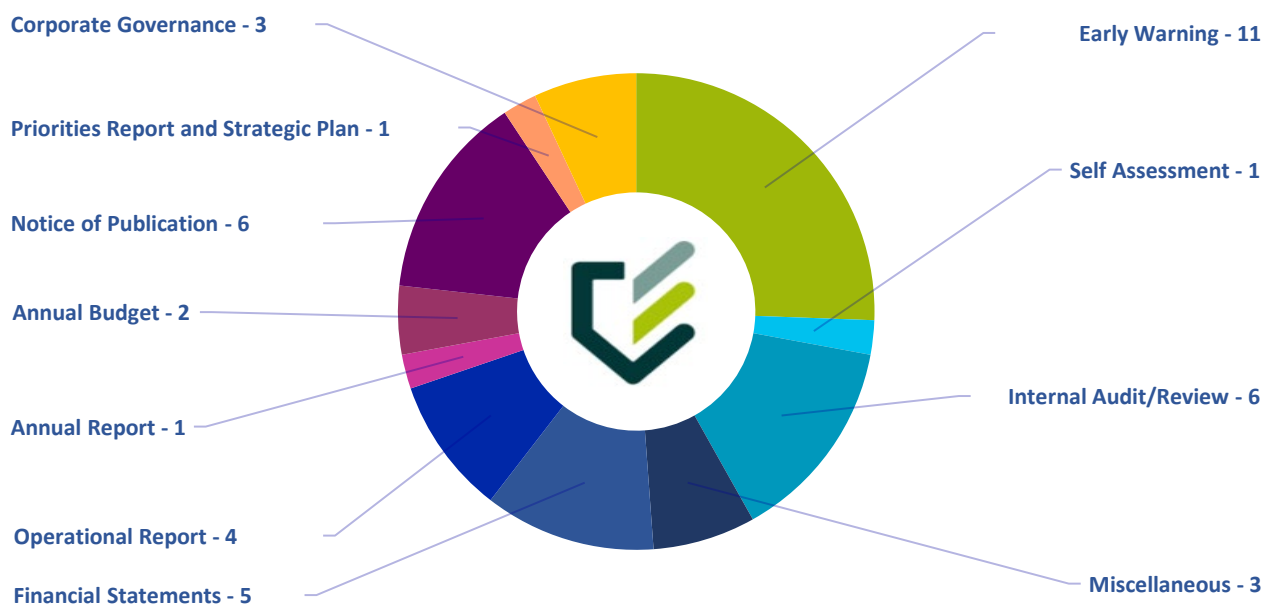
Head Office Location	Members	Head Office Location	Members	Head Office Location	Members
Alberta	17	New Brunswick	1	Saskatchewan	3
British Columbia	16	Ontario	158	United Kingdom	1
Manitoba	3	Québec	32	United States	5

(iv) Rule Reviews

During the Reporting Period, eight CIRO rule amendments were [approved or not objected](#) to by CSA Members. Ten rule amendments [continue to be under review](#) as of December 31, 2025.

(v) Materials Filed

CIRO was responsible for filing certain information with CSA Members on a regular or ad hoc basis. During the Reporting Period, 43 filings were received from CIRO and reviewed by CSA Members.



(vi) Meetings and Other Discussions

During regular meetings held with CIRO, among other varied topics, the following key subjects were discussed and followed up by CSA Members.

Topic	Activities During the Reporting Period
SRO Transition	<ul style="list-style-type: none"> Integration priorities, including: CIRO Rulebook Consolidation, CE harmonization and advancing incorporated advisor project. Overseeing development of the new Cooperative Operating Agreement between CIRO and CIPF.
Registration Delegation	<ul style="list-style-type: none"> Effective April 1, 2025, the ASC, OSC, FCNB, NL, NSSC, NT, NU, PEI and YT issued delegation orders authorizing CIRO to undertake registration functions for investment dealers and mutual fund dealers. Effective July 1, 2025, the AMF issued similar registration delegation to CIRO. Effective October 1, 2025, the FCAA and the MSC authorized CIRO to carry out certain registration functions on its behalf. The BCSC published amendments to BC Instrument 22-502 Registration by IIROC on October 16, 2025, which proposes to delegate to CIRO registration of mutual fund dealers and their related individual registration categories. Streamlining the registration delegation process across all jurisdictions creates a harmonized approach to registration for CIRO members.
Annual Priorities	<ul style="list-style-type: none"> CSA Members provided input on CIRO's Annual Priorities for Fiscal 2026 which were published by CIRO on April 10, 2025.
Short Selling	<ul style="list-style-type: none"> CIRO, together with CSA Members, continues to review the regulatory framework regarding short selling to ensure it is current and appropriate.⁹ On January 11, 2024, CIRO published amendments to the Universal Market Integrity Rules (UMIR) to support and clarify the short selling framework by adding a new positive requirement to have, prior to order entry, a reasonable expectation to settle a short sale. Proposed guidance was published for comment on the same date to clarify various current and proposed requirements related to short sales and failed trades. The approval and final amendments were published on December 5, 2024. On January 9, 2025, CIRO published the Proposed Amendments Respecting Mandatory Close-out Requirements for comment. The proposal intended to introduce mandatory close-out requirements to reduce fail-to-deliver positions. Work continues on this initiative.
Trading Increments	<ul style="list-style-type: none"> On December 18, 2025, CSA Members approved CIRO's Amendments Respecting Trading Increments to align Canadian trading increments with those in the United States for certain U.S. inter-listed securities. This follows the joint CSA / CIRO Staff Notice 23-331 Request for Feedback on December 2022 SEC Market Structure Proposals and Potential Impact on Canadian

⁹ Joint CSA/IIROC Staff Notice 23-329 [Short Selling in Canada](#) was published on December 8, 2022. The consultation resulted from: (i) concerns raised by the Capital Markets Modernization Taskforce; and (ii) issues identified during the CSA's work on CSA Staff Notice 25-306 [Activist Short Selling Update](#). The consultation provided an overview of the existing regulatory landscape surrounding short selling and requested public feedback on areas for regulatory consideration.

CSA/CIRO's responses to the public comment letters were published in Joint CSA/CIRO Staff Notice 23-332 [Summary of Comments and Responses to CSA/IIROC Staff Notice 23-329 Short Selling in Canada](#) on November 16, 2023. CSA and CIRO have formed a working group to more broadly examine short selling issues in the Canadian market context.

Topic	Activities During the Reporting Period
	<p>Capital Markets (12 comment letters were received) and the final rules adopted by the U.S. Securities and Exchange Commission in September 2024.</p>
Crypto Assets	<ul style="list-style-type: none"> • CIRO's Membership Intake Team continued to review applications for: (i) new membership from crypto-asset trading platforms; and (ii) business change from existing CIRO investment dealers planning on expanding into the distribution of crypto asset products. • On June 11, 2025, CIRO convened a roundtable exercise with CIRO Members to discuss crypto-asset trading with the objective of exploring potential risks and challenges to operational resilience of crypto-trading platforms.
Disgorgement Distribution Program	<ul style="list-style-type: none"> • On February 1, 2023, CIRO published a consultation paper Proposal on Distributing Funds Disgorged and Collected through New SRO Disciplinary Proceedings to Harmed Investors. The public comment period ended on May 1, 2023. • On October 21, 2024, after carrying out additional research, CIRO published a consultation paper Distributing Funds Disgorged and Collected through CIRO Disciplinary Proceedings to Harmed Investors (Phase II). The public comment period ended on January 20, 2025. • During the Reporting Period, CIRO applied for use of the Restricted Fund for the Disgorgement Distribution Program. • Relatedly, on August 21, 2025, CIRO published a request for comment for its Proposed Amendments to Specifically Provide for Disgorgement in the Mutual Fund Dealer Rules. The public comment period ended on September 22, 2025 and eleven comment letters were received.
Arbitration Program Review	<ul style="list-style-type: none"> • On December 6, 2022, IIROC published a consultation paper Review of the IIROC Arbitration Program. The public comment period ended on March 6, 2023. • On October 31, 2024, after reaching out to stakeholders and conducting additional research, CIRO published a follow-up consultation paper Proposal to Modernize the CIRO Arbitration Program. The public comment period ended on January 31, 2025, and 17 comment letters were received.
Continuing Education	<ul style="list-style-type: none"> • CSA Members approved CIRO's first phase of amendments to Harmonize CIRO's CE Programs between the IDPC Rules and the MFD Rules. • A second phase of the CE Program will consider future amendments that have a more significant impact on member operations and/or information technology systems. • Both phases of the CIRO CE Program are expected to become effective on January 1, 2028.
Proficiency Regime	<ul style="list-style-type: none"> • CIRO completed their multi-year initiative to enhance proficiency standards for approved persons under the IDPC Rules. The resulting amendments to the IDPC Rules take effect on January 1, 2026. • CIRO published syllabi, practice exams and study guides to support the requirements of their new investment dealer proficiency model. Fitch Learning is supporting CIRO with the design of the syllabus and the exams for investment dealer-approved persons. • Consideration of any future changes to the proficiency regime relating to mutual fund dealers will be done in collaboration with CIRO.

Topic	Activities During the Reporting Period
Client Focused Reforms (CFRs)	<ul style="list-style-type: none"> • CSA and CIRO staff conducted compliance reviews during 2024, which focused on evaluating registrants' compliance with the CFR's enhanced Know Your Client, Know Your Product and suitability determination requirements. • Joint CSA/CIRO Staff Notice 31-368 on Client Focused Reforms: Review of Registrants' Know Your Client, Know Your Product and Suitability Determination Practices and Additional Guidance was published on December 10, 2025.
Cybersecurity Breach	<ul style="list-style-type: none"> • On August 11, 2025, CIRO identified a cybersecurity breach and took measures to secure their systems and protect information in their custody. Relevant authorities were notified, including the CSA, law enforcement and applicable privacy commissioners. • In August, CIRO launched an investigation with the support of cybersecurity experts. <ul style="list-style-type: none"> ○ Preliminary results identified that registration information for Member firms and registered individuals had been affected. CIRO shared these findings publicly and notified the impacted persons, offering credit monitoring and identity theft protection. CIRO also announced that the investigation and e-discovery process was still ongoing. ○ To determine the full impact of the cyber incident it took CIRO over 9,000 hours and five months of investigation. These e-discovery processes are typically technical in nature and take time to complete. ○ Following completion of the investigation, CIRO publicly disclosed in January 2026 that some clients or former clients of CIRO Member firms (approximately 750,000) had also been impacted by the cybersecurity breach. • CIRO is currently communicating with impacted individuals and offering credit monitoring and identity theft protection. • CIRO is actively evaluating all their systems, processes and data security measures and is committed to enhancements as necessary on an expedited timeline. • Cybersecurity and data management are critically important to the CSA. The CSA has been engaged since the August 2025 notification, requesting and assessing information provided and actions taken or contemplated in the near future by CIRO. This information will help the CSA determine if any further steps must be taken in its oversight function of CIRO. • Additionally, on an ongoing basis, the CSA reviews and is enhancing its own data management and cybersecurity practices.
Account Transfers	<ul style="list-style-type: none"> • On July 10, 2025, CIRO published a request for comment on the Modernization of Requirements for Account Transfers and Bulk Account Movements (IDPC Rule 4800 and MFD Rule 2.12) to partially address delays clients experience in moving their accounts from one firm to another. The comment period closed on October 8, 2025. • At the same time, CIRO published a white paper on Enhancing Timely and Efficient Account Transfers in Canada: Phase 1 – Defining the problem and laying the groundwork for change which is reviewing the technology solutions that can be introduced to improve the efficiency of account transfer-related processes. • 23 comment letters were received; review and analysis are underway.
Order Execution Only (OEO)	<ul style="list-style-type: none"> • On December 13, 2024, CIRO published a request for comment bulletin, Non-Tailored Advice in the Order Execution Only Channel. The bulletin included consultation questions seeking input from stakeholders on several issues

Topic	Activities During the Reporting Period
	<p>related to do-it-yourself (DIY) investing and the ability for CIRO investment dealers to offer non-tailored advice on OEO services. The public comment period ended on February 26, 2025.</p> <ul style="list-style-type: none"> • CIRO published Proposed New Guidance on Order Execution Only Account Services and Activities on August 12, 2025 with comments due by November 10, 2025. The proposed new guidance would replace the current Guidance Note 3400-21-003¹⁰ as there has been significant growth in DIY investing resulting in a required update on clarifying the prohibition on recommendations in OEO accounts and decision-making support that OEO Dealers can provide to clients.
<p>CIRO's Office of the Investor and CIRO Investor Advocacy Panel</p>	<p>CIRO provided quarterly updates on Office of the Investor outreach activities including its Awareness Campaign on fraud and upcoming publications:</p> <ul style="list-style-type: none"> • On April 15, 2025, CIRO published its annual Office of the Investor — Year in Review Report. • CIRO published its DIY Investing: New investors and the role of social media - Qualitative Research Report on July 2, 2025 summarizing the latest research from CIRO's Office of the Investor on DIY investors. • On September 18, 2025, CIRO published its annual Investor Advisory Panel Annual Report.
<p>Other Initiatives</p>	<p>CSA Members engaged with CIRO staff on other regulatory matters, such as:</p> <ul style="list-style-type: none"> • completing the risk-based oversight review of CIRO that targeted specific processes within the areas of: (i) information technology; (ii) membership intake; and (iii) trading conduct and compliance. The results of this oversight review have been published in a separate report which was issued on July 23, 2025. • CIRO's ongoing role in the surveillance of equity markets in real time, along with its monitoring of debt trading, cross asset trading between derivatives listed on the Montréal Exchange and the underlying securities, and Canadian crypto asset trading platform activity. • CIRO engaged with the AMF and the new Chambre de l'assurance regarding Bill 92 - <i>An Act to amend various provision mainly with respect to the financial sector</i> which was assented on June 4, 2025 and the transfer of functions and powers related to continuous education and discipline for mutual fund dealer representatives from the Chambre de l'assurance to CIRO by July 4, 2026. • CIRO published the joint CSA/CIRO Staff Notice 31-369 Guidance on the Application of Securities Legislation to Finfluencer Activity to provide guidance on how securities laws apply to the activities of finfluencers and to registrants and issuers who work with them.

¹⁰ [GN 3400-21-003](#) was published on December 31, 2021. It provided guidance for OEO Dealers on expectations, regulatory requirements, tools, services, activities and information in line with OEO account regulatory framework.

(B) CIPF



(i) Regulatory Status

CIPF is approved and accepted as an IPF¹¹ to provide protection within prescribed limits to eligible customers of CIRO dealer member firms suffering losses, if client property held by a member firm was unavailable as a result of the insolvency of a dealer member.

(ii) Fund Statistics

CIPF maintains two separate funds designed to provide coverage to eligible customers of CIRO members: an Investment Dealer Fund (**IDF**) and Mutual Fund Dealer Fund (**MFDF**).

The IDF liquidity resources are available to satisfy potential claims for coverage by customers of CIRO members registered as an “investment dealer” or in the categories of both “investment dealer” and “mutual fund dealer”. The MFDF liquidity resources are available to customers of CIRO members registered as a “mutual fund dealer”, except for customer accounts located in Québec for which mutual fund dealers are not required to contribute to the MFDF and, accordingly, those accounts are not afforded coverage by the MFDF.¹²

Both funds maintain their own insurance and lines of credit.

	December 31, 2025	December 31, 2024	% Change
IDF ¹³ Liquidity Resources			
IDF	\$594M	\$572M	3.8%
Insurance	\$440M	\$440M	-
Lines of Credit	\$125M	\$125M	-
MFDF Liquidity Resources			
MFDF	\$59M	\$57M	3.5%
Insurance	\$40M	\$40M	-
Lines of Credit	\$30M	\$30M	-
TOTAL	\$1,288M	\$1,264M	1.9%

(iii) Rule Reviews

During the Reporting Period, there were no changes to CIPF’s policies and by-laws that required approval by CSA Members.

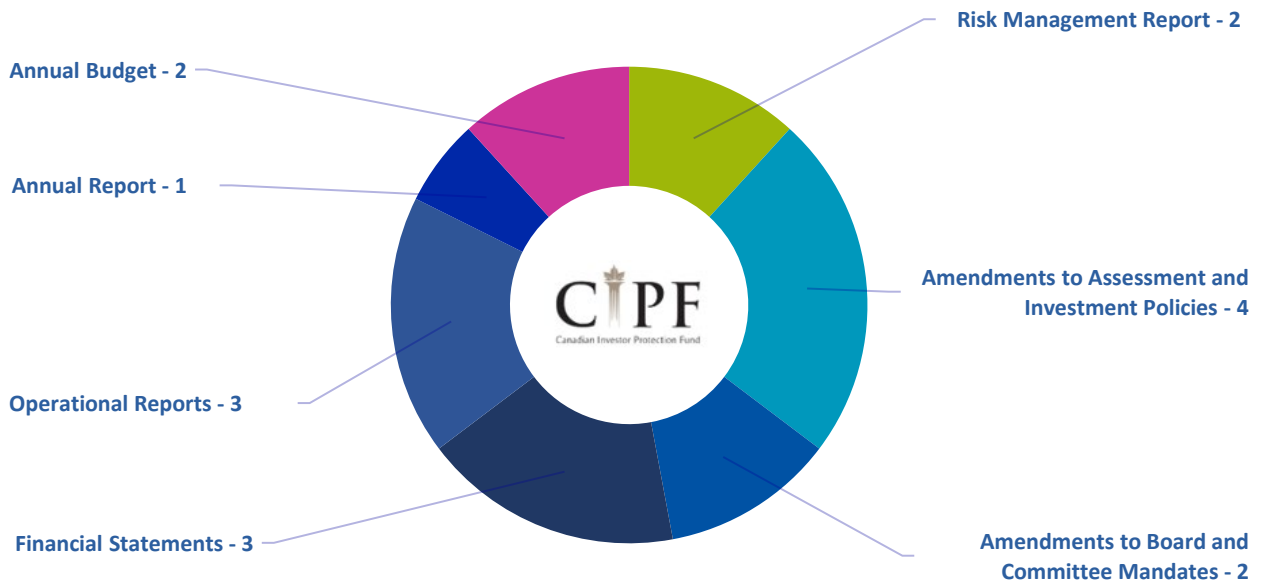
¹¹ In Québec, CIPF is an accepted contingency fund. Please refer to Footnote #2 on page 4.

¹² Coverage may be applicable to an account located in Québec, if the account is carried by a mutual fund dealer operating outside of Québec and only in the event of the carrier’s insolvency.

¹³ Values relating to IDF’s and MFDF’s General Fund, insurance and lines of credit are from CIPF’s 2025 unaudited annual financial statements.

(iv) Materials Filed

CIPF was responsible for filing certain information with CSA Members on a regular or ad hoc basis. During the Reporting Period, 17 filings were received from CIPF and reviewed by CSA Members.



(v) Meetings and Other Discussions

During regular meetings held with CIPF, among other varied topics, the following key subjects were discussed and followed up by CSA Members.

Topic	Activities During the Reporting Period
Cooperative Operating Agreement	<ul style="list-style-type: none"> CSA Members continue to oversee the development of the new Cooperative Operating Agreement which will replace the current Transitional Agreement.
Strategic Plan	<ul style="list-style-type: none"> During the Reporting Period, CSA Members reviewed CIPF's new three-year strategic plan for 2025 – 2027 and the goals and objectives supporting the strategic plan. On June 30, 2025, CIPF published its three-year strategic plan.
Investment Policies and Strategies	<ul style="list-style-type: none"> CIPF continues with its integration efforts and aligned the investment policies and strategies of the IDF and MFDF. CSA Members reviewed CIPF's new investment policy (Investment Policy). In developing the Investment Policy, the legacy IDF investment policy was used as a baseline and its applicability was extended to the MFDF. At the end of the Reporting Period, the portfolios of the IDF and MFDF were successfully transitioned to a third-party portfolio manager and the consolidated Investment Policy was implemented for both funds.
Review of Adequacy of Assets in the Funds	<ul style="list-style-type: none"> Separate funds, insurance and lines of credit continue to be maintained for the coverage of investment dealers and mutual fund dealers. For the IDF, CIPF continues to use a credit-risk based fund model (IDF Model) to project its liquidity resource requirement and assist in the setting of its fund size. During the Reporting Period, CIPF's Board reviewed the adequacy of the level of resources available in relation to the risk exposure of investment dealer member firms. No overall changes have been made to the methodology since October 2021, although the Probability of Default was recalibrated by third-party consultants during the Reporting Period. In 2024, third-party actuaries performed a review of the fund size of MFDF and determined that its current size is adequate to cover multiple insolvencies. As well, MFDF continues to have a secondary layer of insurance in the amount of \$20 million in respect of any losses to be paid out of the MFDF in excess of \$50 million. This is in addition to the original layer of insurance of \$20 million in respect of any losses to be paid out of the MFDF in excess of \$30 million. CIPF continues to analyze the movement of mutual fund dealers to dual registration and the impact on liquidity resources. The fit-for-purpose review continues, to assess if it is appropriate to extend the IDF Model to the mutual fund dealer universe. CIPF staff are in the process of developing a credit-risk model for the MFDF.
Crypto Assets	<ul style="list-style-type: none"> The Coverage Policy continues to state explicitly that crypto assets are excluded from CIPF's coverage. CIPF undertakes regular reviews of the scope and terms of its Coverage Policy; however, the primary areas of interest for CIPF continue to be the custody, control and pricing of crypto assets, specifically their recoverability, tradability and traceability.
Meeting of International IPFs	<ul style="list-style-type: none"> As a member of the steering committee of organizing the 2025 International Investor Compensation Schemes (ICS) Conference, in Madrid, CIPF

Topic	Activities During the Reporting Period
	<p>participated in discussions focused on crisis preparedness and streamlining insolvency proceedings.</p> <ul style="list-style-type: none"> • In addition, CIPF attended the 2025 International Deposit Guarantee Schemes Conference, which was held in conjunction with the ICS Conference as part of the European Forum of Deposit Insurers International Conferences. • The opportunity to exchange information with international compensation funds has been valuable. • CIPF also held meetings with domestic compensation funds.
Insolvencies	<ul style="list-style-type: none"> • During the Reporting Period, there were no CIRO member insolvencies whereby CIPF was actively involved.
Other initiatives	<ul style="list-style-type: none"> • In late 2025, AMF and CIPF conducted a scenario walkthrough to assess potential coverage overlap between the AMF fund (Fonds d'indemnisation des services financiers (FISF) and CIPF, with discussions scheduled to resume at the beginning of 2026. • During the Reporting Period, CSA Members jointly conducted a risk-based oversight review to determine whether CIPF complied with the terms and conditions of its Approval Orders. The review focused on changes to CIPF's Assessment Policies and assessment methodologies, and whether approval by CIPF's Board was obtained for those changes. The results of the oversight review will be published in a separate report in 2026.

COMPOSITION OF OVERSIGHT COMMITTEES

Market Regulation Steering Committee

AMF	Dominique Martin	MSC	Angela Duong
ASC	Lynn Tsutsumi	NSSC	Doug Harris,
BCSC	Mark Wang		Cynthia Tambago-Alday
FCAA	Curtis Brezinski	OSC	Michelle Alexander
FCNB	Clayton Mitchell		

CIRO Oversight Committee









AMF	Jean-Simon Lemieux Roland Geiling Herman Tan Marie-Andrée Beaulieu	Pascal Bancheri Catherine Lefebvre Cheick Kaba Diakité Kim Legendre	Serge Boisvert Lucie Prince Victorien Kabiwa
ASC	Sasha Cekerevac Amy Tollefson Harvey Steblyk	Rose Rotondo Shafyn Manji	Gerald Romanzin Jessica Kester
BCSC	Michael Brady Navdeep Gill Liz Coape-Arnold Catherine Tearoe	Joseph Lo Zach Masum Georgina Steffens Anton Lunyov	Eric Lan Anne Hamilton
FCAA	Curtis Brezinski		
FCNB	Nick Doyle	Jake Calder	
MSC	Kim Asano	Angela Duong	Aishah Abdullahi
NL	Loyola Power		
NSSC	Doug Harris Cynthia Tambago-Alday	Brian Murphy	Angela Scott
NT	Matthew Yap		
NU	Debora Bissou		
OSC	Joseph Della Manna Stacey Barker Dimitri Bollegala Shivkanwal Padam	Karin Hui Christopher Byers Kosta Nikolopoulos Dena Staikos	Scott Laskey Chris Jepson
PEI	Curtis Toombs		
YT	Rhonda Horte		

CIPF Oversight Committee

AMF	Jean-Simon Lemieux Cheick Kaba Diakité	Lucie Prince Kim Legendre	Herman Tan
ASC	Sasha Cekerevac Amy Tollefson Harvey Steblyk	Rose Rotondo Shafyn Manji	Gerald Romanzin Jessica Kester
BCSC	Michael Brady Eric Lan Liz Coape-Arnold Anton Lunyov	Joseph Lo Zach Masum Navdeep Gill	Georgina Steffens Anne Hamilton Catherine Tearoe
FCAA	Curtis Brezinski		
FCNB	Nick Doyle	Jake Calder	
MSC	Kim Asano	Angela Duong	Aishah Abdullahi
NL	Loyola Power		
NSSC	Doug Harris Cynthia Tambago-Alday	Brian Murphy	Angela Scott
NT	Matthew Yap		
NU	Debora Bissou		
OSC	Joseph Della Manna Scott Laskey Kosta Nikolopoulos	Stacey Barker Christopher Byers Shivkanwal Padam	Karin Hui Chris Jepson
PEI	Curtis Toombs		
YT	Rhonda Horte		

RULE/BY-LAW/POLICY AND PROCEDURES AMENDMENTS¹⁴

As of December 31, 2025

Completed	CIRO Rule/By-Law Amendments	Publication Date
	Integrated Fee Model	January 30, 2025
	Amendments Respecting Proficiency Model for Approved Persons under the IDPC Rules	April 17, 2025
	Enhanced Cost Reporting Amendments	July 3, 2025
	Housekeeping Amendments to UMIR	July 10, 2025
	Amendments to UMIR Respecting Net Asset Value Orders and Intentional Crosses	July 17, 2025
	Amendments Respecting Contingent Derivative Orders	November 20, 2025
	Amendments Respecting Trading Increments	December 18, 2025
	Harmonization of the CIRO Continuing Education Programs – Phase 1	January 8, 2026 ¹⁵

¹⁴ On March 27, 2025, CIRO published bulletin 25-0091 [Withdrawal of Proposed Amendments Respecting Reporting, Internal Investigation and Client Complaint Requirements](#) for the withdrawal of the IIROC Notice 22-0009 *Proposed Reporting, Internal Investigation and Client Complaint Requirements* originally published on January 13, 2022.

¹⁵ CSA Members approved the Harmonization of the CIRO Continuing Education Programs – Phase 1 proposed rule amendments in December 2025. The Notice of Approval / Implementation was published on January 8, 2026.

As of December 31, 2025

In Progress	CIRO Rule/By-Law Amendments	Publication Date
	Rule Consolidation Project – Phase 1	October 20, 2023
	Rule Consolidation Project – Phase 2	January 11, 2024
	Rule Consolidation Project – Phase 3	April 18, 2024
	Rule Consolidation Project – Phase 4	October 17, 2024
	Proposed Amendments Respecting Mandatory Close-Out Requirements	January 9, 2025
	Rule Consolidation Project – Phase 5	March 27, 2025
	Modernization of Requirements for Account Transfers and Bulk Account Movements	July 10, 2025
	Proposed Amendments to the Mutual Fund Dealer Rules Respecting Disgorgement	August 21, 2025
	Approved Person Fees Component Within the Annual Fee of Dealer Member Fee Model	October 8, 2025
	Proposed Amendments Respecting Fully Paid Securities Lending and Financing Arrangements (Republication)	October 16, 2025

APPENDIX A – WHAT WE DO

The oversight of CIRO is coordinated through a [Memorandum of Understanding \(MOU\)](#) among CSA Members. The MOU describes the oversight program used by CSA Members to:

- oversee CIRO's performance of its self-regulatory activities and services;
- ensure that CIRO is acting in the public interest and complying with the terms and conditions of its Recognition Orders.

A [similar MOU](#) exists for the oversight of CIPF.

Coordinators

Each MOU sets out that two CSA Members are designated as coordinators, tasked with the role of coordinating, communicating and scheduling activities of the oversight program between CSA Members, and between CSA Members and CIRO or CIPF (**Coordinators**).

The Coordinators serve for four years on a staggered rotation basis among the two designated CSA Members. In 2023, BCSC and OSC were designated as the inaugural Coordinators by consensus of all CSA Members. Effective January 1, 2026, the ASC replaced BCSC as Coordinator.

Oversight Committees

Each MOU requires the establishment of the [CSA Market Regulation Steering Committee \(MRSC\)](#)¹⁶ and the Oversight Committees for [CIRO](#) and [CIPF](#) (**Oversight Committees**)¹⁷. Each Oversight Committee acts as a forum to discuss issues, concerns and proposals related to the oversight of their respective entities. The committees include representatives from CSA Members, with the Coordinators serving as the leads.

¹⁶ The MRSC is the forum for coordination and providing updates where issues relate to both CIRO and CIPF.

¹⁷ The Oversight Committees are operational committees under the oversight of MRSC.

APPENDIX B – REGULATORY PROGRAM

Oversight Function	Activities During the Reporting Period
Annual Risk Assessment	<ul style="list-style-type: none"> CSA Members evaluate each entity’s potential inherent risks and mitigating controls in each functional area of the entity. This evaluation may become the basis for future oversight activities.
Review of Proposed Rules	<ul style="list-style-type: none"> CIRO is required to seek approval from CSA Members for proposed new rules, policies, and constating documents (collectively, the rules) and by-laws, and any changes to existing rules and by-laws. CIPF is required to seek approval or non-objection of any changes to certain policies (e.g., coverage policy) and its by-laws. A “housekeeping” rule change is one that has no material impact on investors, issuers, registrants, CIRO, CIPF, or the Canadian capital markets generally (e.g., changes of an editorial nature; changes necessary to conform to applicable securities legislation, statutory or legal requirements, accounting or auditing standards). If a rule change is not classified as housekeeping, it is published for public comment.
Review of Materials Filed	<ul style="list-style-type: none"> CIRO and CIPF are responsible for filing certain information (other than proposed rules or by-laws) with each CSA Member. This information includes, but is not limited to, reports on financial condition, regulatory self-assessment, risk management, systems integrity, market surveillance, internal audit, progress on compliance examination results, and enforcement matters. CSA Members review issues and the materials filed, which help inform the annual risk assessment.
Meetings	<ul style="list-style-type: none"> Quarterly meetings are scheduled with CIRO and semi-annual meetings with CIPF, to discuss the oversight process and to share information about emerging and/or ongoing regulatory issues and trends. Ad hoc meetings are held to address the oversight of specific issues.
Oversight Reviews	<ul style="list-style-type: none"> Oversight reviews are a more in-depth process for CSA Members to make an independent assessment of whether the entities have met their regulatory obligations. The scope of an oversight review is determined by the results of the annual risk assessment and/or specific issues that arise on a periodic basis. As part of an oversight review, CSA Members may interview CIRO or CIPF staff, review written policies and procedures to understand the systems and processes in place, and examine files on a sample basis. CSA Members jointly conduct risk-based oversight reviews that target specific processes within the functional areas under review.

QUESTIONS

If you have any questions or comments about this CSA Staff Notice, please contact any of the following:

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