



# Reference Document for:

## Chief Compliance Officer (CCO) Competencies

CCOs are also Executives. The Executive competency profile also applies and should be referred to additionally.

Refer to Appendix 6 to review the CCO competency profile



**CIRO · OCRI**

Canadian Investment  
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des investissements



## CCO Competencies

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From a regulatory perspective, the competencies for a highly competent and compliant CCO at a minimum include the following:

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<b>1</b> Understand and apply the following as applicable: <ul style="list-style-type: none"><li>I. Fundamental regulatory knowledge and industry information</li><li>II. Role, mandate and oversight of the compliance department</li></ul>		<b>2</b> Understand and apply the following as applicable: <ul style="list-style-type: none"><li>I. Compliance risk management</li><li>II. Business functions and compliance risk</li></ul>	
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<b>3</b> Understand and apply the following as applicable: <ul style="list-style-type: none"><li>I. Regulatory reporting</li><li>II. Regulatory examinations</li><li>III. Regulatory investigations</li><li>IV. Regulatory action</li></ul>		<b>4</b> Understand and apply the following as applicable: <ul style="list-style-type: none"><li>I. Policies and Procedures (P&amp;Ps)</li><li>II. Internal investigation and client complaint handling</li><li>III. Dealing with clients</li></ul>	
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<b>5</b> Understand and apply the following as applicable: <ul style="list-style-type: none"><li>I. Compliance monitoring and assessment of compliance</li><li>II. Compliance reporting</li></ul>			



1. Compliance Function and Operations		
SUB-COMPETENCY	KNOWLEDGE For CCO to understand as applicable	BEHAVIOURS AND SKILLS For CCO to apply as applicable
I. Fundamental regulatory knowledge and industry information	<ul style="list-style-type: none"> <li>Knowledge applicable to Executives</li> <li>Products, services and business line functions subject to compliance requirements and applicable standards of conduct</li> <li>Qualifications and registration requirements</li> <li>Business conduct requirements</li> <li>Canadian Investment Regulatory Organization (CIRO) examination procedures</li> <li>Oversight and compliance responsibilities</li> <li>Supervisory responsibilities</li> <li>Confidential information containment requirements</li> <li>Prudent business practices affecting: <ul style="list-style-type: none"> <li>Safeguarding of client and dealer assets</li> <li>Trading</li> <li>Conflicts of interest</li> <li>Business interruption</li> <li>Marketing and sales practices</li> <li>Dealer operational and financial viability</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Demonstrate understanding of fundamental regulatory and prudent industry practices</li> <li>Demonstrate expertise in the process of compliance</li> <li>Promote a dealer culture that stresses integrity and effective risk management</li> <li>Demonstrate behaviour that conforms to high standards of conduct</li> <li>Maintain high standards of skill, care and diligence in professional activities</li> <li>Observe a high ethical standard</li> <li>Build good stakeholder relations</li> <li>Advise on dealer regulatory matters</li> <li>Deliver effective leadership and oversight</li> </ul>
II. Role, mandate and oversight of the compliance department	<ul style="list-style-type: none"> <li>Compliance department's role within the dealer</li> <li>Objectives and enterprise-wide authority for compliance department activities</li> <li>Authority to oversee effectiveness and consistency of business units' compliance practices</li> </ul>	<ul style="list-style-type: none"> <li>Lead the compliance function at a dealer</li> <li>Provide strategic direction on compliance</li> <li>Adopt and maintain a deep understanding of all aspects of compliance</li> <li>Apply the compliance department's mandate across the dealer</li> </ul>



1. Compliance Function and Operations		
SUB-COMPETENCY	KNOWLEDGE For CCO to understand as applicable	BEHAVIOURS AND SKILLS For CCO to apply as applicable
	<ul style="list-style-type: none"> <li>The compliance department's relationship with the dealer's Supervisors, other Executives, business and compliance units</li> <li>Role of other Executives, including the Chief Financial Officer (CFO), and Supervisors</li> <li>Role of the Board and Board reporting</li> <li>Role of the Ultimate Designated Person (UDP)</li> <li>Dealer-level factors for compliance program design, including: <ul style="list-style-type: none"> <li>Products and services</li> <li>Clients (e.g., retail or institutional)</li> <li>Nature, scale and complexity of the dealer's business and operations</li> <li>Volume and size of transactions</li> <li>Internal and external stakeholders</li> </ul> </li> <li>Responsibilities under different CCO models, including: <ul style="list-style-type: none"> <li>Shared</li> <li>Multiple</li> <li>Specialized</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Support and promote a visible commitment to a culture of compliance, integrity and ethical values</li> <li>Discuss and review dealer compliance programs with UDP as needed</li> <li>Effectively conduct general compliance department activities, including: <ul style="list-style-type: none"> <li>Acting as a knowledge resource on compliance and regulatory matters</li> <li>Establishing and maintaining compliance policies and procedures (P&amp;Ps) to assess compliance by the dealer and individuals acting on its behalf with CIRO requirements, and securities and derivatives laws and regulations</li> <li>Advising on the adequacy and effectiveness of the dealer's compliance status and related processes</li> <li>Monitoring significant areas of compliance risk</li> <li>Supporting the development and delivery of mandatory training and education</li> <li>Reviewing business opportunities from a compliance perspective, including new products and markets</li> <li>Proactively identifying, addressing and escalating issues of non-compliance, where necessary</li> <li>Documenting results and corresponding actions</li> <li>Undertaking a risk-based approach to monitor and test for compliance</li> </ul> </li> </ul>



1. Compliance Function and Operations		
SUB-COMPETENCY	KNOWLEDGE For CCO to understand as applicable	BEHAVIOURS AND SKILLS For CCO to apply as applicable
		<ul style="list-style-type: none"><li>○ Identifying key risks related to new products, services, locations and technology changes</li><li>• Monitor and assess compliance with CIRO requirements, securities and derivatives laws, and other applicable laws, regulations and guidelines across the dealer</li><li>• Ensure significant issues are identified, addressed and escalated in a timely manner, where necessary</li><li>• Be aware of conflicts of interest and influence when making decisions</li><li>• Balance business development decisions with compliance considerations</li><li>• Explain and demonstrate importance of compliance to business units when considering business decisions</li><li>• Ensure Directors and Executives understand compliance and regulatory measures needed to fulfill their respective obligations</li><li>• Act, where necessary, to fulfil Board directions concerning compliance matters</li><li>• Ensure all unaddressed compliance matters are resolved in a timely matter</li><li>• Ensure compliance staff have direct access to all Executives</li><li>• Ensure independence and accountability through internal controls, such as policies and procedures</li></ul>



2. Risk Management		
SUB-COMPETENCY	KNOWLEDGE For the CCO to understand as applicable	BEHAVIOURS AND SKILLS For CCO to apply as applicable
I. Compliance risk management	<ul style="list-style-type: none"> <li>• Risk of legal/regulatory sanctions, financial loss and reputational damage, which arise from regulatory requirement violations</li> <li>• Role of compliance as a risk management function</li> <li>• Quality control (transactional) testing</li> <li>• Controls to be used to comply with legislation and to manage risk</li> <li>• Red flags that compliance measures are not adequate, including indications of: <ul style="list-style-type: none"> <li>○ Defined standards being ignored</li> <li>○ Attempts to circumvent existing controls</li> <li>○ Internal control gaps</li> <li>○ Contradictory or inconsistent information</li> <li>○ Recurrent compliance infractions or concerns involving same Approved Persons</li> <li>○ Requests for exceptions to approved policies and procedures</li> </ul> </li> <li>• Standards of conduct, including the obligation to deal fairly, honestly and in good faith with clients (where applicable)</li> <li>• The system for monitoring and enforcing standards of conduct</li> <li>• Updates when changes arise to the dealer's business practices and/or regulatory requirements</li> <li>• Annual employee certification</li> </ul>	<ul style="list-style-type: none"> <li>• Make diligent inquiries when faced with non-compliance red flags</li> <li>• Document compliance actions</li> <li>• Administer and monitor internal controls</li> <li>• Adopt and carry out risk mitigation measures, where necessary</li> <li>• Appropriate allocation of resources based on business model, operations, regulatory priorities, and considering risk mitigation strategies</li> <li>• Ensure sufficient resources and staff training, including: <ul style="list-style-type: none"> <li>○ Time and materials needed to fulfill monitoring requirements and to assess compliance-driven activities</li> <li>○ Regular instruction on dealer compliance policies, procedures, regulatory requirements and relevant topics</li> </ul> </li> <li>• Maintain effective, clear communications with all staff and other Approved Persons in order to emphasize the importance of compliance</li> </ul>



2. Risk Management		
SUB-COMPETENCY	KNOWLEDGE For the CCO to understand as applicable	BEHAVIOURS AND SKILLS For CCO to apply as applicable
II. Business functions and compliance risk	<ul style="list-style-type: none"> <li>Registration obligations, including: <ul style="list-style-type: none"> <li>National Registration Database (NRD) use, where applicable</li> <li>The registration review process (including enhanced due diligence or fit and proper review)</li> <li>Approved Persons on enhanced (close or strict) supervision</li> <li>Terms and conditions</li> <li>Suspensions and termination</li> <li>Proficiency and continuing education</li> </ul> </li> <li>Obligation of those with supervisory responsibilities including: <ul style="list-style-type: none"> <li>Daily supervision</li> <li>Monthly supervision</li> <li>Supervision of business locations</li> <li>Internal audit program</li> </ul> </li> <li>Investment banking</li> <li>Trade desk obligations, including: <ul style="list-style-type: none"> <li>Trading Conduct Compliance</li> <li>Market surveillance, including live and post-trade surveillance</li> <li>Universal Market Integrity Rules (UMIR) violations and gatekeeper reports</li> <li>Non-Participant reviews</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Assess overall adequacy of the trade surveillance system</li> <li>Ensure proper trade compliance reporting, including: <ul style="list-style-type: none"> <li>Reporting on potential market violations</li> <li>Following-up on non-compliance matters relating to trade violations</li> <li>Providing adequate response to regulatory matters relating to potential and exposed trading violations</li> <li>Anti-Money Laundering Legislation (AML) reporting</li> </ul> </li> <li>Assess, report, follow-up and respond to all areas of compliance risk</li> </ul>



3. Regulatory Reporting, Examinations, Investigations and Actions		
SUB-COMPETENCY	KNOWLEDGE For the CCO to understand as applicable	BEHAVIOURS AND SKILLS For CCO to apply as applicable
I. Regulatory reporting	<ul style="list-style-type: none"> <li>Regulatory reporting requirements, including: <ul style="list-style-type: none"> <li>Registration reporting</li> <li>Complaint reporting generally and through the Complaints and Settlement Reporting System (ComSet)</li> <li>Internal investigation and discipline reporting</li> <li>Gatekeeper reporting</li> <li>Suspicious transaction reporting</li> <li>Cybersecurity incident reporting</li> <li>Record-keeping</li> </ul> </li> <li>Importance of timely responses to market-related inquiries</li> </ul>	<ul style="list-style-type: none"> <li>Ensure appropriate reports are generated as required</li> <li>Ensure required reports are filed in a timely manner</li> <li>Ensure the dealer has appropriate processes in compliance with its regulatory reporting requirements</li> </ul>
II. Regulatory examinations	<ul style="list-style-type: none"> <li>Regulatory examination, including: <ul style="list-style-type: none"> <li>External auditor results on the existence of specific internal controls</li> <li>Periodic self-assessment and/or certifications</li> <li>UDP and CCO responsibilities in responding to regulatory examinations, including: <ul style="list-style-type: none"> <li>Supervisory duties and responsibilities</li> <li>Delegation of compliance duties</li> <li>Lines of communication/accessibility</li> <li>Measures taken for non-compliance</li> </ul> </li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Conduct timely remediation of compliance matters where issues have been identified</li> </ul>





3. Regulatory Reporting, Examinations, Investigations and Actions		
SUB-COMPETENCY	KNOWLEDGE For the CCO to understand as applicable	BEHAVIOURS AND SKILLS For CCO to apply as applicable
	<ul style="list-style-type: none"> <li>Dealer controls, procedures and information reviewed in regulatory examinations, including: <ul style="list-style-type: none"> <li>Supervisory structure</li> <li>Risk management</li> <li>Internal policies</li> <li>Operational procedures and controls</li> </ul> </li> </ul>	
III. Regulatory investigations	<ul style="list-style-type: none"> <li>Regulatory investigation and potential disciplinary actions arising from CIRO investigations, including: <ul style="list-style-type: none"> <li>Failure to adequately conduct an internal investigation, review or audit, where required by legislation or by the dealer's P&amp;Ps</li> <li>Failure to follow up with appropriate internal disciplinary action</li> <li>Failure to keep adequate records regarding an investigation</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Communicate and cooperate with regulatory investigations, including fulfilling document production requests</li> </ul>
IV. Regulatory action	<ul style="list-style-type: none"> <li>Enforcement proceedings, including: <ul style="list-style-type: none"> <li>Temporary orders</li> <li>Protective orders</li> <li>Hearings</li> <li>Sanctions</li> </ul> </li> <li>Dealer-level terms and conditions</li> <li>Registration action on individual Approved Persons</li> <li>"Opportunity to be heard" process</li> </ul>	<ul style="list-style-type: none"> <li>Take steps to ensure remediation of matters of non-compliance identified through regulatory action</li> </ul>



4. Compliance Responsibilities		
SUB-COMPETENCY	KNOWLEDGE For the CCO to understand as applicable	BEHAVIOURS AND SKILLS For CCO to apply as applicable
I. Policies and Procedures (P&Ps)	<ul style="list-style-type: none"> <li>Compliance-based subject matter coverage, which includes: <ul style="list-style-type: none"> <li>Product due diligence</li> <li>Principal/agent arrangements</li> <li>Personal financial dealing with clients</li> <li>Outside activities</li> <li>Referral arrangements</li> <li>AML and anti-terrorism requirements</li> <li>Outsourcing and 3<sup>rd</sup> party risk management</li> <li>Reporting of attempted suspicious transaction</li> <li>Reporting of terrorist property to Financial Transactions and Reports Analysis Centre of Canada (FINTRAC)</li> <li>Trade desk, order taking and trading restrictions</li> <li>Personal trading by employees</li> <li>Corporate finance/underwriting</li> <li>Conflicts of interest</li> <li>Information containment and barriers (fire walls)</li> <li>Sales/advertising/marketing/promotional activities</li> <li>Education and training</li> <li>Record-keeping requirements</li> <li>Disclosure requirements</li> <li>Registration requirements</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Establish and maintain P&amp;Ps for assessing compliance by the dealer and individuals acting on its behalf</li> <li>Ensure that P&amp;Ps include the following: <ul style="list-style-type: none"> <li>Identify controls to be used to comply with laws and manage risk</li> <li>Set out standards for conduct, and systems for monitoring and enforcing standards</li> <li>Outline who is expected to do what, when (frequency), and how</li> <li>Be readily accessible</li> <li>Be updated when business or laws change (and any required subsequent testing for effectiveness)</li> </ul> </li> <li>Ensure adequacy of P&amp;Ps, including: <ul style="list-style-type: none"> <li>Aligning the compliance department's practices with industry and regulatory compliance practices that are appropriate for executing its mandate</li> <li>Evaluating how new and changing legislation affect the dealer's risk profile, in addition to internal business changes</li> <li>Developing or amending the dealer's compliance policies as legislation is introduced/amended, or as new or changing business activities require different legislative obligations</li> </ul> </li> </ul>



4. Compliance Responsibilities		
SUB-COMPETENCY	KNOWLEDGE For the CCO to understand as applicable	BEHAVIOURS AND SKILLS For CCO to apply as applicable
	<ul style="list-style-type: none"> <li>○ Business locations (e.g. site openings, closings)</li> <li>○ Privacy and data protection legislation requirements and procedures</li> <li>○ Business continuity and disaster recovery planning</li> <li>○ Cyber-security and technology related controls</li> </ul>	<ul style="list-style-type: none"> <li>○ Documenting new or amended compliance policies and communicating them across the dealer on a timely basis</li> <li>○ Supporting other Executives to identify, address and integrate significant legislative or regulatory requirements into their business activities through appropriate procedural controls</li> <li>● Ensure appropriate procedures for delegation of duties across compliance and supervisory units</li> <li>● Confirm that all delegated duties are fulfilled by individuals who have the requisite knowledge and experience</li> <li>● Ensure individuals are included in the correct Approved Persons/Registration category, including appropriate jurisdictions and related exemptions</li> <li>● Ensure Executives are alerted about serious alleged misconduct and legal actions</li> <li>● Adopt adequate internal investigation and whistleblower P&amp;Ps, and revise periodically</li> <li>● Establish procedures to ensure that appropriate internal disciplinary measures are applied for compliance breaches</li> <li>● Consider the role of other Executives and Supervisors with respect to implementation and updating of the P&amp;Ps</li> </ul>
II. Internal investigation and	<ul style="list-style-type: none"> <li>● Sales and operational matters</li> <li>● Internal investigation requirements</li> </ul>	<ul style="list-style-type: none"> <li>● Establish P&amp;Ps for complaint handling, which describe:</li> </ul>



4. Compliance Responsibilities		
SUB-COMPETENCY	KNOWLEDGE For the CCO to understand as applicable	BEHAVIOURS AND SKILLS For CCO to apply as applicable
client complaint handling	<ul style="list-style-type: none"> <li>Client complaint requirements, including: <ul style="list-style-type: none"> <li>Policies and procedures</li> <li>Publishing complaint handling procedures</li> <li>Escalating serious problems and the role of the CCO</li> <li>Acknowledging and responding to complainants</li> <li>Duty to assist in client complaint resolution</li> <li>Client complaint file</li> </ul> </li> <li>The role and responsibilities of the DCO</li> <li>External client litigation management</li> <li>Dispute resolution, including: <ul style="list-style-type: none"> <li>Alternative Dispute Resolution (ADR)</li> <li>Internal Ombudsman and Ombudsman for Banking Services and Investments (OBSI)</li> <li>CIRO's arbitration program</li> <li>Civil litigation</li> </ul> </li> <li>Settlement agreements</li> </ul>	<ul style="list-style-type: none"> <li>The fair and thorough investigation of the complaint</li> <li>The process by which an assessment is made regarding the merit of the complaint</li> <li>Where the complaint is determined to have merit, the process to be followed in determining what offer should be made to the client</li> <li>The remedial actions which may be appropriate to be taken within the dealer</li> <li>Internal disciplinary measures</li> <li>A procedure that will ensure complaints are not dismissed without proper consideration</li> <li>A balanced approach to dealing with complaints that considered the interests of the complainant, the dealer (including its Approved Persons and employees)</li> <li>A process that ensures employees, Approved Persons and their Supervisors are aware of complaints filed by their clients</li> <li>Procedures to inform an appropriate Executive of any serious misconduct</li> <li>Procedures to monitor the general nature of complaints</li> <li>Appoint a Designated Complaints Officer (DCO)</li> <li>Actively review and change applicable internal procedures and practices after detecting frequent and repetitive complaints about the same or similar matters</li> </ul>



4. Compliance Responsibilities		
SUB-COMPETENCY	KNOWLEDGE For the CCO to understand as applicable	BEHAVIOURS AND SKILLS For CCO to apply as applicable
		<ul style="list-style-type: none"><li>• Ensure all clients receive a clearly written summary of the dealer's complaint handling procedures and a copy of a CIRO approved complaint handling process brochure</li><li>• Ensure appropriate training of relevant staff about client complaint handling, to ensure:<ul style="list-style-type: none"><li>○ Appropriate levels of due diligence are observed when hiring personnel</li><li>○ Designated staff have appropriate training and resources and to fulfill their responsibilities</li><li>○ Approved Persons communicate regularly with clients and review accounts periodically</li><li>○ All client issues are raised with Supervisors and compliance staff as needed</li></ul></li><li>• Ensure Approved Persons, their Supervisors and relevant Executives are alerted about respective complaints as needed</li><li>• Be mindful of Approved Persons with a pattern of potential misconduct</li><li>• Be mindful of matters that trigger an internal investigation</li><li>• Distinguish between an internal investigation and regulatory monitoring (e.g., ongoing trade supervision), including application of relevant policies and procedures</li><li>• Conduct, oversee and/or support an internal investigation</li></ul>



4. Compliance Responsibilities		
SUB-COMPETENCY	KNOWLEDGE For the CCO to understand as applicable	BEHAVIOURS AND SKILLS For CCO to apply as applicable
III. Dealing with clients	<ul style="list-style-type: none"><li>• Know Your Client (KYC), Know Your Product (KYP), suitability determination and account appropriateness requirements and exemptions</li><li>• Documentation requirements for compliance with:<ul style="list-style-type: none"><li>○ Client account openings</li><li>○ KYC, KYP and suitability determination and account appropriateness requirements</li><li>○ Correspondence with clients</li><li>○ Compliance and supervision activities of the dealer</li></ul></li><li>• Discretionary accounts</li><li>• Account transfers</li></ul>	<ul style="list-style-type: none"><li>• Monitor and assess compliance with KYC, KYP, suitability determination and account appropriateness requirements</li><li>• Monitor and assess compliance with requirements to manage conflicts of interest in the best interest of clients and to put the client's interest first when making a suitability determination</li><li>• Monitor and assess compliance with account supervision policies</li><li>• Monitor compliance with supervision of trading and non-trading activity</li><li>• Monitor compliance with clients' investment mandates</li><li>• Conduct regular review of client contracts, forms and disclosure to ensure continuous compliance with the regulatory requirements</li></ul>



5. CCO Duties and Obligations		
SUB-COMPETENCY	KNOWLEDGE For the CCO to understand as applicable	BEHAVIOURS AND SKILLS For CCO to apply as applicable
I. Compliance monitoring and assessment of compliance	<ul style="list-style-type: none"> <li>• Policies and procedures for identifying areas of non-compliance with securities and derivatives laws and regulations which: <ul style="list-style-type: none"> <li>○ May reasonably create a risk of harm to a client</li> <li>○ May reasonably create a reasonable risk of harm to the capital markets</li> <li>○ Is reasonably part of a pattern of non-compliance</li> </ul> </li> <li>• Red flags that compliance measures are not adequate, including indications of: <ul style="list-style-type: none"> <li>○ Defined standards being ignored</li> <li>○ Attempts to circumvent existing controls</li> <li>○ Internal control gaps</li> <li>○ Contradictory or inconsistent information</li> <li>○ Recurrent compliance infractions or concerns involving same Approved Persons</li> <li>○ Requests for exceptions to approved policies and procedures</li> </ul> </li> <li>• Dealer's marketing activities, including: <ul style="list-style-type: none"> <li>○ Electronic and print advertising</li> <li>○ Sales practices</li> </ul> </li> <li>• Client disclosures</li> <li>• Policies and procedures for review or self-assessment of all compliance programs</li> <li>• Compliance department training, including: <ul style="list-style-type: none"> <li>○ New training sessions and content</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>• Advise on compliance mandate and budget for Board approval</li> <li>• Proactively identify, assess, advise on, act on, communicate, monitor, escalate and report on dealer compliance with regulatory requirements</li> <li>• Provide business units and staff with assistance, guidance and training on compliance</li> <li>• Review and assess red flags that have been escalated to the CCO</li> <li>• Where required by law or regulation, provide regulators with timely notice about a dealer's material compliance breaches</li> <li>• When appropriate, notify regulators about dealer misconduct and all related actions, including remedial measures</li> <li>• Support and guide business units, all Approved Persons, compliance and staff members</li> <li>• Oversee the scope, structure and activities of the compliance department to ensure that it fulfills its mandate</li> <li>• Establish a system of controls to: <ul style="list-style-type: none"> <li>○ Provide reasonable assurance that the dealer and its individuals comply with securities and derivatives laws and regulations</li> <li>○ Manage the dealer's business risks in accordance with prudent business practices</li> <li>○ Identify, mitigate and resolve novel and ongoing compliance issues</li> </ul> </li> </ul>



5. CCO Duties and Obligations		
SUB-COMPETENCY	KNOWLEDGE For the CCO to understand as applicable	BEHAVIOURS AND SKILLS For CCO to apply as applicable
	<ul style="list-style-type: none"> <li>○ Ongoing training and updates</li> <li>● Ongoing and future compliance initiatives</li> <li>● Operational considerations and deficiencies</li> <li>● Evaluation of existing reporting and effectiveness</li> <li>● Monitoring and surveillance (including supervision of Tier 2 trading and on-site business locations reviews)</li> <li>● Aggregation and trend analysis</li> <li>● Daily trade review for errors, proper settlement and unusual trading activity</li> <li>● Role of CCO on managed account committee</li> </ul>	<ul style="list-style-type: none"> <li>○ Notify parties (internal or external) when an issue occurs and must be reported</li> <li>● Monitor and assess individual and dealer compliance with internal requirements and applicable securities and derivatives laws and regulations</li> <li>● Provide UDP and the Board with: <ul style="list-style-type: none"> <li>○ Reasonable assurance that the dealer meets all standards, applicable securities and derivatives laws and regulations</li> </ul> </li> <li>● Identify instances of material weaknesses and non-compliance</li> <li>● Remind appropriate staff members of key procedures and controls</li> </ul>
II. Compliance reporting	<ul style="list-style-type: none"> <li>● Material information and deficiencies reporting obligations to the UDP and the Board</li> <li>● Red flags that compliance measures are not adequate, including indications of: <ul style="list-style-type: none"> <li>○ Defined standards being ignored</li> <li>○ Attempts to circumvent existing controls</li> <li>○ Internal control gaps</li> <li>○ Contradictory or inconsistent information</li> <li>○ Recurrent compliance infractions or concerns involving same Approved Persons</li> <li>○ Requests for exceptions to approved policies and procedures</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>● Report on: <ul style="list-style-type: none"> <li>○ Overall dealer and Approved Persons compliance assessment</li> <li>○ Significant issues and corrective measures concerning regulatory examinations, internal audits, inquiries, investigations, enforcement actions and outcomes</li> <li>○ Changes to the dealer's compliance P&amp;Ps</li> <li>○ Civil actions and material complaints</li> <li>○ Compliance deficiencies for both dealers and Approved Persons, including significant issues identified in gatekeeper reports</li> <li>○ Weaknesses in significant areas of risk and gaps in compliance</li> </ul> </li> </ul>





5. CCO Duties and Obligations		
SUB-COMPETENCY	KNOWLEDGE For the CCO to understand as applicable	BEHAVIOURS AND SKILLS For CCO to apply as applicable
		<ul style="list-style-type: none"><li>○ Insufficient resources</li><li>○ Proposed changes to regulatory requirements</li><li>○ Key compliance risks facing the dealer and how they are being addressed</li><li>● Escalate red flags to the UDP and report all material incidents of non-compliance to the UDP</li><li>● Report the results of the assessment to the Board of Directors at least annually</li><li>● Document outcomes of all matters escalated</li></ul>