

## CLIENT RELATIONSHIP MODEL (CRM) REPORTING (CRM2) TOOLKIT

### Regulatory Documents

1. **Final** – [CSA Notice of Amendments to National Instrument \(NI\) 31-103](#): Registration Requirements, Exemptions and Ongoing Registrant Obligations and to Companion Policy 31-103CP Registration Requirements, Exemptions and Ongoing Registrant Obligations (Cost Disclosure, Performance Reporting and Client Statements) – March 28, 2012
2. **Final** – [CSA Unofficial Consolidation of NI 31-103 and its Companion Policy](#): National Instrument 31-103: Registration Requirements, Exemptions and Ongoing Registrant Obligations – as of July 15, 2013
3. **Comment request** – [IIROC Draft CRM2 Rule](#): Client Relationship Model – Phase 2 Performance Reporting and Fee/Charge Disclosure Amendments to Dealer Member Rules 29, 200 and 3500 and to Dealer Member Form 1
  - Comments due **February 10, 2014**: On section 29.9 [pre-trade disclosure of charges] and subparagraph 200.2(l)(v)(C) [trade confirmation disclosure of debt security compensation] (effective July 15, 2014); and technical changes (effective when the rule on these points is final)
  - Comments due **April 10, 2014**: On position, additional statements, compensation and performance reporting requirements
4. **Awaited**: Canadian Securities Administrators (CSA) Qs and As (first expected mid-July 2013, now January 2014)
5. **Underway**: Discussion with IIROC of new standards that may need to be developed
6. **Underway**: Interactions with fund industry (Investment Funds Institute of Canada, Portfolio Management Association of Canada, Federation of Mutual Fund Dealers) re obtain information to meet requirements (started)

### IIAC Tools and Templates

7. **Plan on a Page: Overview/Timing of IIROC CRM2 Rules Conforming with CSA CRM2 (NI 31-103)**
8. **Quick NI 31-103 Fields, Frequency, Format, and Exclusions Cross-Reference**
  - Relationship Disclosure
  - Pre-Trade Contents
  - Confirmation Contents
  - Account Statement Contents
  - Additional Statement Contents
  - Annual Charges and Compensation Report Contents
  - Annual Performance Report Contents

## 9. Data Maps

- Compensation
- Performance

## 10. Other Documents that May Be of Use

- “The Devil is in the Details” CRM2 Reporting Presentation
- Industry Asset Classification Schema
- Industry Adjusted Cost Base (Book Cost) Matrix

## 11. In draft: CRM Issues List

## 12. In draft: IIAC Member CRM2 Implementation surveys (first on current state of systems and potential directions; later on member readiness status; etc.)

## Communications

### 13. CRM Messaging: Simple explanation of CRM1 and challenges of CRM2

### 14. In discussion – Value for Compensation: Helping advisors articulate the value of advice

## Events

- November 21: Broadridge Focus Group on Compensation and Performance Reporting
- November 26: “The Devil is in the Details “ – Broadridge-sponsored Presentation on CRM2 Reporting, with a Focus on Compensation and Performance Reporting
- November 27: Roundtable on Pre-Trade Confirmation and Fixed Income Reporting
- February 27/14: IIAC Compliance and Ops Symposium session
- TBD: Industry roundtable on enhanced suitability risk feed
- TBD: Industry roundtable on market value standards

## Committees You Can Join

- **CRM2 Implementation Working Group:** hands-on project-management-oriented working group working to identify and solve CRM2 implementation problems; will review draft responses to regulators on CRM2-related comment requests or other needs identified for comment

**Note:** The following may merge with CRM2IWG as mandates increasingly overlap

- CRM Reporting Prototypes Working Group (CRMRPWG): hands-on working group reviewing reporting requirements in detail
- Market Value Working Group (MVWG): hands-on working group reviewing reporting requirements in detail
- Client Relationship Model (CRM) Working Group (CRMWG): broad-based high-level committee; mainly compliance staff; useful for keeping generally aware of CRM developments