

CDS ATON[®] DEALER PRACTICES GUIDE

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The Account Transfer Online Notification (ATON) service, operated by CDS Clearing and Depository Services Inc. (CDS), facilitates the automated exchange of client account information, cash and securities between CDS and CDS Participants who have subscribed to the ATON service. ATON users include Investment Industry Regulatory Organization of Canada (IIROC) broker-dealers and other regulated financial firms such as banks, trust companies, investment fund dealers, insurance companies, and credit unions.

ATON contributes to the efficient and accurate transfers of client assets and funds between financial intermediaries. It also assists firms in complying with IIROC [Regulation 2300](#).

This guide has been prepared **by** ATON users **for** ATON users to maximize the operational efficiencies, and other benefits, that ATON can deliver to industry.

Sincerely,

Investment Industry Association of Canada

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CHAPTER 1

ATON best practices

ATON best practices for all participants are indicated in the table below.

1.0 Client information	
1.1	<p>Full and accurate social insurance numbers (SINs) are mandatory for registered accounts. If a SIN is not entered correctly, the RFT is automatically rejected.</p> <p>Note: A SIN is not required for non-registered accounts due to privacy regulations. If a client does not provide their SIN, some firms populate the SIN field with a generic SIN. If the generic SIN number has been used, the delivering firm has the right to request a copy of the transfer document before agreeing to process this request using ATON.</p>
1.2	<p>Account types must match (i.e., non-registered to non-registered, registered to registered, locked-in to locked-in, etc.).</p>
2.0 IIROC Regulation 2300 (Rules 2.1 to 5.2) timeframes	
2.1	<p>RFTs must not be recycled (creates problems with asset lists resulting in dupe deliveries or aging) in accordance with IIROC regulation 2300. For more information, refer to IIROC Regulation 2300 at www.iiroc.ca.</p>
2.2	<p>RFT must be returned to receiver within 48 hours.</p>
2.3	<p>Transfer must be completed within 10 business days.</p>
3.0 Address Mismatch and Address Undeliverable Resolution	
3.1	<p>Create the best practice to manage the administrative challenges at time of processing the ATON address mismatch:</p> <ol style="list-style-type: none"> 1 The receiving dealer will initiate the transfer on ATON based on signed transfer form submitted by the client pursuant to Rule 2300. 2 The delivering dealer will review the ATON request and in instances of address mismatch, will validate the transfer request by reviewing the additional client information that appears on the RFT Header such as the Client Name, SIN, Account Number or Plan ID. 3 The delivering dealer will use the ATON header screen as back up of the address mismatch. The receiver will not be required to provide a copy of the transfer form. The ATON header screen will serve as proof of client's new address. <p>The ATON header screen displays the client's address at the receiving dealer. The client information showing on the ATON header is expected to be similar to what is indicated on the hard copy transfer form that the client signed.</p> <p>Anticipated results from implementing best practice:</p> <ul style="list-style-type: none"> • Timely processing of transfers by eliminating the manual process of sending a copy of the transfer form to the delivering firm. • Significant reduction on transfer rejects between dealer members due to address mismatch • Cost savings in ATON processing as the initial transfer request will no longer be rejected

4.0 Requests for copies of transfer forms
4.1 A firm may request that a transfer form be faxed to them before they will proceed with the transfer. The requested form should be faxed within the same day. Some firms may reject the transfer if the form is not received on the same day.
5.0 Pending trades
5.1 The deliverer should advise the receiver (i.e., update the RFT) if the asset list will be returned on settlement date.
5.2 The client signed transfer form authorizes the cancellation of all open trades. Some firms disable their systems to stop trading, while others are unable to or elect not to. As a result, if a client still continues to trade, the deliverer may reject the transfer request until all trading ceases.
6.0 Short positions
6.1 The receiving firm must deliver confirmed short positions to the delivering firm within 48 hours or must advise if there are any problems. Note: Short positions are delivered outside of ATON, they do not automatically get set up in CDSX and DTC.
6.2 The delivering firm may request that an account be sent back to them if the account will be under-margined on the deliverer's side as a result of the short not being returned.
7.0 Small debit balances
7.1 Debit balances of less than \$300 should be accepted at the time of the original transfer. If the debit is processed and/or requested at a later date, the delivering firm should provide some form of explanation for the debit.
8.0 Mixed type transfers
8.1 The RFT Detail screen must be completed by the receiving firm on the same day by 4:00 p.m. ET, otherwise the RFT notice may be rejected manually or by the system.
9.0 RFT in accepted (ACC) status
9.1 This applies to Broadridge only. If the deliverer needs to reject an RFT in ACC status, \$0.01 is added to the asset list with a clearing institution code of OTC (over-the-counter) and a request to rescind the RFT is sent to the receiving firm to enable the delivering firm to reject the RFT. For more information, see Broadridge on page 9.
9.2 If processing is delayed for a valid reason, the status of the account is changed by some firms from NEW to ACC and the reason is indicated (e.g., market action required, approval, etc.).
10.0 RFT in unconfirmed (UNC) status
10.1 Generally speaking, if an account is in UNC status, account transfers may exclude the disputed asset items and return the asset list to the delivering firm after being notified of the disputed asset items by the receiving firm or rescind the account transfer with the reason for rescinding. The deliverer is unable to change an RFT to return status if rescinded by the receiver, it will have to be rejected. For the account transfer to occur, the deliverer may have to exclude the disputed asset items.
11.0 In cash requests
11.1 The deliverer is required to take market action as requested. It is not the delivering firm's responsibility to scrutinize the client's assets to determine what the client should or should not redeem (e.g., any DSC, claw back fees, SEG funds with a guarantee, or any other product's that the client may wish to be transferred in kind).

12.0 Managed accounts	
12.1	Many firms have accounts that require special handling. Managed accounts and accounts with security baskets need to be decoded and charged before an asset list can be returned to the receiving institution. This process can cause a delay in returning an asset list.
13.0 Mutual funds	
13.1	If a mutual fund transfer is rejected by CDS, powers of attorney are issued (manually with some firms and automatically with other firms) and delivered to the receiving firm. The delivering firm generating the mutual fund power of attorney must provide the following information on the power of attorney: client name, account type, fund code, mutual fund description, quantity/amount to be transferred, deliverer's cross-reference account number and dealer code, and receiver's cross-reference account number and firm name.
13.2	When attaching mutual fund assets, the delivering firm must ensure that the mutual fund description is populated on the Asset Detail screen. The mutual fund code is not sufficient.
14.0 RESP (registered education savings plan) transfers	
14.1	All notional information must be exchanged between the firms before the RFT is set up in ATON. If no information is received, the deliverer will reject the RFT.
14.2	All receiving firms should add a memo on the RFT indicating that the notional information has been exchanged.
15.0 RIF (registered income fund) transfers	
15.1	Debits will not be incurred by the deliverer unless the receiving firm indicates on the RFT special instruction line that they (the receiving firm) will accept a debit balance when an RIF payment is made.
15.2	Some firms, depending on the amount of the debit/RIF payment, may reject the request to send debit.
15.3	In accordance with CRA regulations, RIF payments must be made by the delivering firm prior to releasing an account.
16.0 LIRA (locked-in regulated annuity) accounts	
16.1	The receiving firm must provide the pension legislation governing their account to the delivering firm electronically, via the CDS ATON Panel. The delivering firm must confirm the pension legislation matches their client account details, prior to returning an ATON transfer request. A physical Locked In Agreement (LIA), is not required.
16.2	If the pension legislation does not match, the delivering firm should reject the ATON request, and notify the receiving firm of the pension legislation on file for their account in the ATON memo field.
16.3	If any additional documentation is required by provincial regulation, the forms must be provided to the receiving firm prior to the ATON setup. If not received, the delivering firm should notify the receiving firm of the additional requirement, and if not received within 24 hours, reject the transfer.

17.0 NEW and OLD Ontario LIF (life income account)	
17.1	If a receiving account is NEW or OLD, the receiving firm must enter NEW or OLD in the memo field when they set up their RFT notice.
17.2	If a delivering account is NEW or OLD, the delivering firm must enter NEW or OLD in the memo field.
17.3	For non-ATON and/or blue-dot transfers: <ul style="list-style-type: none"> • The receiving firm must indicate NEW or OLD on the Transfer form and the Locked-In Agreement • The delivering firm must indicate NEW or OLD on the Transfer Form that is returned to the receiving firm.
18.0 NEW and OLD federal LIF and RSP (retirement savings plan) accounts	
18.1	If a receiving account is NEW or OLD, the receiving firm must enter NEW or OLD in the memo field when they set up their RFT notice.
18.2	If a delivering account is NEW or OLD, the delivering firm must enter NEW or OLD in the memo field.
18.3	For non-ATON and/or blue-dot transfers: <ul style="list-style-type: none"> • The receiving firm must indicate NEW or OLD on the transfer form and the locked-in agreement • The delivering firm must indicate NEW or OLD on the transfer form that is returned to the receiving firm.
19.0 Guarantee and guarantor accounts	
19.1	Guarantee and guarantor accounts must be requested at the same time. If they are not, the deliverer may reject the request. The delivering firm should return both RFT asset lists with a comment in the MEMO field that both RFTs must be confirmed at the same time.
20.0 IPP (individual pension plans)	
20.1	ATON can be used to process IPPs. Some firms have these accounts set up in their non-registered range.
21.0 Estate transfers	
21.1	Only some estate transfers can be processed using ATON. In these cases, the account setup and information (i.e., name, SIN, account type, etc.) must match the estate documentation in order for the transfer to be processed in ATON. Estate documentation must be provided upon request from the delivering firm.

CHAPTER 2

Service providers

ATON has the following service providers:

- Broadridge (formerly ADP) – 10-digit account number
- ISM – seven-digit account number
- Dataphile – eight-digit account number

For Broadridge 10-digit account numbers, the last two digits represent the type and check. If the last two digits are missing, do one of the following:

- For Broadridge users, use CKDG to obtain the last two digits prior to setting up an RFT notice.
- For non-Broadridge users, contact the delivering firm to obtain the required information.

Receiving firms (excluding Broadridge) must set up two RFTs for multiple currencies as follows:

- First RFT must be a partial equal = US\$
- Second RFT must be a full equal = C\$

Note: Transfers that do not meet this requirement will be rejected.

2.1 Broadridge

This section includes ATON operating practices that are specific to Broadridge and Broadridge clients.

Mixed type transfers

The receiving firm is required to complete the RFT Detail screen by 4:00 p.m. ET each day. Transfers received after 4:00 p.m. ET are automatically rejected.

Cash on hold

For full transfers where cash is part of the asset list, the cash will be initially on hold using the following process:

1. The first calculation (occurring after the receiver confirms the asset list) books the applicable outbound transfer fee.

2. The second calculation picks up additional interest or additional funds booked in the account after the RFT has been returned and/or confirmed and settles the new amount.

To reduce exposure, a \$5000 threshold (maximum) amount (i.e., the difference between the original amount on the asset list returned by the deliverer and the net cash disbursement amount of the second calculation) exists. This \$5000 variance (approved by the ATON Steering Committee) is the maximum amount that a deliverer can modify the dollar amount for cash.

There are four scenarios:

- Credit increase
- Credit decrease
- Debit increase
- Debit decrease

Depending on the scenario and the \$5000 variance, the actual settled funds determined by the second calculation could result in a \$0.01 to \$5000 variance. The \$0.01 amount will result if the funds on the original asset list are changing from a debit to a credit or a credit to a debit.

3. The cash is released from hold with a confirmed pending (CONP) status after 24 hours has elapsed.

CHAPTER 3

ATON participant operating practices

This chapter includes ATON operating practices for the following participants:

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- [Canaccord Genuity Corporation](#) on page 14
- [CIBC](#) on page 15
- [Computershare](#) on page 16
- [DWM Securities Inc.](#) on page 16
- [Edward Jones](#) on page 17
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- [Manulife Securities Inc./Manulife Securities Investment Services Inc.](#) on page 18
- [NBIN](#) on page 21
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- [RBC](#) on page 25
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- [TD Waterhouse](#) on page 28
- [VMD Desjardins](#) on page 29

3.1 BMO Financial Group

Vendor: Broadridge		
Account Range	CUID/Dealer No.	Contact Information
BMO NB Transfers		
245-00000-00 TO 835-99999-99	CUID: NTDT Dealer: 9185	416-552-7001
BMO Investorline Transfers		
210-00000-00 TO 229-99999-99	CUID: NTDT Dealer: 9185	N/A
BMO adviceDirect Transfers		
234-00000-00 TO 235-99999-99	CUID: NTDT Dealer: 9185	N/A
BMO Private Bank (BMO Trust Company)		
865-00000 TO 874-99999	CUID: NTDT Dealer: 7555	416-552-7746

Outbound transfers

BMO NB Transfers and BMO IVL Transfers	
Cashable GICs	Cashable GICs cannot be transferred in kind. If the client wishes to sell the GIC, then the receiver has to set up a partial in cash notice with instructions to sell the GIC.
Mutual Fund Partial Notices	If partial notice is set up for a mutual fund transfer, the number of units must be specified instead of the dollar value.
Guarantee/Guarantor Transfers	Both guarantee and guarantor transfers require additional approvals at BMO prior to being transferred.
LIF Accounts	For LIF account transfers, BMO confirms the minimum or the maximum to be paid with the client prior to transfer.
Pledged Accounts	The client or the receiver must obtain a release letter from the BMO bank branch holding the account as collateral and send it to BMO's Risk department located at First Canadian Place, B1 level.
Restricted Accounts	Approval is required to transfer-out accounts coded as restricted.
BMO NB Managed Accounts	Fees are applied to the account upon transfer which may result in debit balances.

BMO Private Bank	
Cashable GICs	Cashable GICs cannot be transferred in kind. If the client wishes to sell the GIC, then the receiver has to set up a partial in cash notice with instructions to sell the GIC.
Proprietary Assets (JHI, GGF55100, some JHN* and Bank of Montreal Bonds*)	BMO Funds (JHI) and GGF55100 are proprietary to BMO Private Banking and cannot be transferred out in-kind. * Some JHN funds and BMO bonds are also considered proprietary.
Mutual Fund Partial Notices	If partial notice is set up for a mutual fund transfer, the number of units must be specified instead of the dollar value.
Transfer Fee	As of July 31, 2013, there is no transfer fee charged for BMO Private Banking transfers.
LIF/RRIF Accounts	For LIF account transfers, approval is needed before transfer to ensure that the payments are made prior to the movement.
Pledged Accounts	A release needs to be obtained before it is transferred out.

Inbound transfers

BMO NB Transfers and BMO IVL Transfers	
Debits Over \$300	Debits over \$300 require approval before acceptance is granted.
Individual Pension Plan (IPP) Transfers	Prior to setting up an IPP transfer in ATON, BMO Nesbitt Burns faxes a copy of the instructions and paperwork to their Compliance department for approval.
GIC Issuers Without BMO Custodial Agreements	GIC issuers who do not have custodial agreements with BMO cannot transfer GICs to BMO in kind.
Asset Lists Returned With Hold Options, Calls and Puts	For asset lists that are returned with hold options, calls and puts, BMO NB and BMO Investorline must obtain approval from their Risk and Options department before confirming asset lists.
L-Market Shares	BMO cannot accept L-market shares (private restricted positions). BMO NB is the only line of business that can accept small business shares.

Cheques and Manual PAs (BMO NB Transfers)	Please send cheques and manual PAs for BMO NB Transfers to the following address: 250 Yonge Street 7th Floor Attention: Account Transfers Toronto, ON M5B 2M8
Physical Securities	Please send all physical securities (certificates) to: 100 King Street West Level B1 Attention: OTC - Cage Window Toronto, ON M5X 1A1

BMO Private Bank	
Debits Over \$300	Debits over \$300 require approval before acceptance is granted.
GIC Issuers Without BMO Custodial Agreements	GIC issuers who do not have custodial agreements with BMO cannot transfer GICs to BMO in kind.
Derivatives (Call, Puts Options)	BMO HPB does not accept derivative products.
Segregated Funds	BMO HPB does not accept segregated funds.
Physical Securities	Please send all physical securities (certificates) to: One First Canadian Place, B1 Level Attention: Document Management Department
New Ontario / Federal LIF Form	The completion and return of the provided New ONT or FED LIF form is required.

Canaccord Genuity Corporation

3.2 Canaccord Genuity Corporation

Vendor	Dataphile
Account information	Account numbers are eight digits in length with a letter in the seventh position. Managed accounts are represented with a letter in the sixth position. CDS CUID: CCAM for client account transfers

The following ATON operating practices are specific to Canaccord Genuity Corporation:

- **Debits greater than \$1000.** Debits that are greater than \$1000 and any short option positions must be approved by the Credit department.

- **GIC transfers.** For GIC transfers, Canaccord must hold a custodial agreement with the issuer before receiving the GIC. If an agreement is not in place at the time the asset list is received, internal approval is requested through the Risk Management department.
- **Managed accounts.** Outbound transfers of managed accounts must be approved by the Managed Account department. They also liquidate the account, if applicable, and charge a fee. A further 24 hours are required to process these accounts and finalize the fees.
- **RIF transfers.** Outbound transfers of RIFs must be approved by the Registered Plans department. They also advise once the RIF payment is complete.
- **Transfer fees.** Outbound transfer fees apply to all accounts whether full or partial transfers.

CIBC

3.3 CIBC

Vendor	Broadridge
Contact information	Transfer Support Line 416-935-0386

The following ATON operating practices are specific to CIBC:

- **CIBC asset management frontiers models.** Frontiers funds are nontransferable in kind.
- **CIBC special products offerings.** CIBC offers ICS managed portfolios:
 - The non-registered accounts start with 530, 531, 533 and 534. There are no sub/internal accounts.
These accounts can be transferred in full and partial for both cash and in kind.
 - The registered accounts begin with the number 5 and has an internal sub-account starting with 559 or 568.
The ICS registered plan account contains a primary account and multiple sub/internal accounts.
 - Options to transfer:
 - Transfer the assets in the primary account only (they should be placed as a partial with notes in special instructions to indicate 'primary only').
 - Transfer full request of the ICS account (it should be placed as a full transfer using the Primary account which will move all the assets in both the primary and sub accounts).

Transfers of only the sub-accounts are not permitted.
- **Transfer fees.** CIBC charges a transfer fee on all full or partial transfer requests.

3.4 Computershare

Contact Information	<p>Transfer Inquires: Email - CACSPCSTransfers@computershare.com</p> <p>Computershare Trust Company of Canada Private Capital Solutions Toronto office 100 University Ave, 8th Floor Toronto, ON, M5J 2Y1</p> <p>CUID: CTCA</p>
Account Information	<p>Account numbers can vary, but will either begin with 6, 7, 1 or 0 and can end in W, M or C.</p> <p>Account numbers beginning with C followed by 10 digits are not for Private Capital Solutions. Please do not set these accounts up on ATON.</p>

The following ATON operating practices are specific to Computershare Trust Company of Canada, Private Capital Solutions:

- For transfers that are requested as full in-kind, Computershare requires the receiving institution to sign a Letter of Acceptance (LOA) for the asset(s) being transferred. Please set the request up on ATON and then send an email to the Transfer Team at the email above with the RFT# requesting the LOA.
- Computershare does not accept nor issue RRIF Assumption letters.
- For inbound transfers, Computershare will not accept negative positions.
- For outbound transfers, Computershare can send debits for fees owing. If there are any questions on fees owing, please contact the Transfer Team at the email above.

DWM Securities Inc.

3.5 DWM Securities Inc.

Vendor	IBM
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The following ATON operating practices are specific to DWM Securities Inc.:

- **Managed accounts.** DWM Securities Inc. has three managed accounts types where an extra day is required to complete the outbound transfer. This is due to management fees that need to be calculated and charged, prior to transfer.
 - Summit accounts (beginning with 14)
 - Vintage accounts (beginning with 21)
 - MIS accounts (beginning with 13 or 15).
- **DYN funds.** Some firms may not be able to hold some of DWM Securities Inc.'s DYN funds. In some cases, DYN 500 and DYN 550 are not accepted in kind. Firms should check their client holdings prior to setting up a transfer and ask for the holding in cash, if necessary, on these funds.

3.6 Edward Jones

Vendor	Broadridge
Contact information	CDS CUID: EDJC DTC participant ID: 5012 90 Burnhamthorpe Road West Mississauga, ON L5B 3C2 customeraccounttransfer@edwardjones.com Transfer Service Line: 800-234-7975 Fax: 877-479-5308 ATON In & Out, Non-ATON In Fax: 877-479-6249 NON-ATON Out
Account information	Registered accounts are 500 account range Non-registered accounts are 200 account range

The following ATON operating practices are specific to Edward Jones:

- **Transfer fees.** Edward Jones charges \$135 + GST/HST for full outbound transfers and \$50 + GST/HST for partial requests.
- **Joint and in trust accounts.** For joint accounts and in trust accounts, the second SIN must be indicated in the MEMO field. Fax transfer forms to verify signatures to avoid delays or rejections.
- **Locked-in agreements.** Send all locked-in agreements before ATON initiation to avoid unnecessary rejects and client transfer delays. Edward Jones will reject the ATON transfer request if a locked-in agreement is not received within 24 hours of ATON initiation.
- **Residual balances.** Edward Jones processes residual balances weekly.
- **Canadian and U.S. funds.** Edward Jones has one account that can carry both Canadian and U.S. currency. Edward Jones does not have separate accounts for currency.
- **Faxed transfer requests.** Edward Jones accepts faxed transfer out requests if signed by the client and accompanied by all appropriate supporting documentation.
- **Off-book assets.** Transfer applications should be sent directly to the mutual fund company.
- **Marriage breakdown transfers.** ATON eligible firms must set these up on ATON to avoid rejection.

*Fidelity Clearing Canada***3.7 Fidelity Clearing Canada**

Vendor	Dataphile
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Contact information	<p>Transfer Inquiries: Email: accttransfer.fcc@fidelity.ca Fax: 416-216-7440 CUID: FIDC DTC participant ID: 5040 Fidelity Clearing Canada (Fidelity) ULC 483 Bay Street, Suite 200, South Tower Toronto, ON M5G 2N7</p>
Account information	<p>Account numbers are 8 alphanumeric digits in length. The last digit (letter) identifies the account type</p>

Manulife Securities Inc./Manulife Securities Investment Services Inc.

3.7 Manulife Securities Inc./Manulife Securities Investment Services Inc.

Vendor	Broadridge - Dataphile
Contact Information	<p>Manulife Securities Inc. PO Box 1619 Waterloo, ON N2J 4K6 CUID: BSIT DTC: 05047 Manulife Securities Investment Services Inc. PO Box 1619 Waterloo, ON N2J 4K6 CUID: BSIF</p>
Account Information	<p>Account numbers are 8 digits in length, the last digit (letter) identifies the account type A - CAD cash B - USD cash E - CAD margin F – USD margin I - PRIF J - LIF/LRIF K - RESP L -LIRA/LRSP M - TFSA R - RRSP S - Spousal RRSP T - RRIF U - Spousal RRIF</p>

Note:

1. Custodian for Options is **Fidelity Clearing Canada**
2. Please send **Cheques** Attention: Manulife Securities Transfer Department
PO Box 1619, Waterloo, ON N2J 4K6
3. Please send **Physical Certificates and Share Ownership Certificates** to
500-1235 North Service Rd West, Oakville, ON L6M 2W2
4. Manulife Securities Email: MLS_TransfersDepartment@manulife.com
5. Manulife Securities Fax: (888) 777-2375. Please email **POA's** individually,
Attention: Transfer Department to the above email address.
6. Accounts that start with a **B** (client name accounts) should be submitted to the fund company directly. Any client name transfers will be rejected back for manual processing.

The following ATON operating practices are specific to Manulife Securities:

Incoming Transfers

- 3.7.1 **Approved Products.** Manulife Securities has a list of approved products. Transfers will be rejected if the product is not on our Approved Funds Database.
- 3.7.2 **Debits over \$300.** Debits that are greater than \$300 must be approved by the Credit department.
- 3.7.3 **GIC Transfers.** For GIC transfers, Manulife Securities must hold a custodial agreement with the issuer before receiving the GIC.
- 3.7.4 **Option Transfers.** Option positions must be approved by our Security Operation department:
 - An option approved account must be available prior to accepting any option position.
 - Manulife Securities Inc. will accept only a Covered call position (short) with underlying long security. The equivalent number of long underlying security shares must come prior to accepting a Covered call position (short) or on same time accepting a Covered call position (short).
 - No Covered call position (short) transferred-in in the Option approval Level 1 account.
 - MSI does not accept or deliver any long Call or long Put positions within 2 weeks of expiry.

Outbound Transfers

- 3.7.5 **MIP 09 series funds.** Are proprietary funds to Manulife Securities and cannot be

Manulife Securities Inc./Manulife Securities Investment Services Inc.

transferred out in kind. If the client wishes to transfer these assets they must go in cash. In order to avoid a rejection please initiate only mixed or in cash instructions only, full in kind instructions will be rejected.

- 3.7.6 **Transfer fees.** Outbound transfer fees apply to all accounts whether full or partial transfers.
- 3.7.7 **Trustee fees.** Where applicable, outbound transfers will have our annual trustee fees applied to the account at time of transfer.
- 3.7.8 **RIF/LIF/Plans with reoccurring events that are being transferred.** Outbound transfers of RIF or LIF accounts, or accounts with reoccurring events must be approved by the Registered Products Department. The transfer will be completed once the payment cycle is complete. Instructions for RIF/LIF payment instructions must be included in the request. Missing instructions will cause a delay in getting the asset list returned.
- 3.7.9 **Managed accounts.** Manulife Securities have fee based and managed accounts that require special handling.
- All fees are charged before an asset list can be returned to the receiving institution. This process can cause a delay in returning an asset list. Managed accounts will be transferred out in cash.
- Note:** Managed Account range begins with M00. Fee Based Account range begins with NF
- 3.7.10 **Address information.** Manulife Securities will reject a transfer request if the client's address does not match Manulife Securities records. To avoid rejection, the client's address must be stated on the special instructions or memo field.
- 3.7.11 **Estate transfers.** Manulife Securities is able to process estate to estate transfers on ATON if documentation is provided. Final approval from Manulife Securities Estates department is required.
- 3.7.12 **Pledged Accounts (NLZ account range).** A release needs to be obtained from Manulife Bank before it is transferred out.
- 3.7.13 **IPP transfers.** Manulife Securities does not manage IPP accounts, and are not able to process IPP to IPP transfers on ATON.
- 3.7.14 **Joint Account to Individual.** Manulife requires a copy of the transfer form to verify that all parties have signed-off on the transfer out request.
- 3.7.15 **Locked-in agreements.** Manulife Securities will reject an ATON transfer within 48 hours if the locked-in agreement is not received.
- 3.7.16 **Residual balances.** Manulife Securities processes residual transfers twice a month.
- 3.7.17 **Corporate Accounts.** A copy of the transfer document is required to be faxed to 1-888-777-2375. This is to confirm that the signing officer for the account has signed the request to transfer.
- 3.7.18 **Rejected Mutual Funds.** Mutual funds that are rejected via Fundserv will have a manual POA faxed to the receiving institution. We do not follow-up with receiving institution to confirm if they have received the POA. If a POA is not received it is the receiving institutions responsibility to email Manulife Securities to request a duplicate.

3.8 NBIN

Vendor	IBM
Contact information	<p>For outbound transfers: NBCAccountTransfers.out@nbc.ca</p> <p>For inbound transfers: NBCAccountTransfers.in@nbc.ca</p> <p>For RESP transfers: transfer.reee@nbcn.ca Tel - 1-833-274-0344 Fax - Montreal: 514-875-3819</p>
Account information	<p>NBIN is divided as follows:</p> <ul style="list-style-type: none"> • NBIN Montreal processes all account ranges for incoming transfers except accounts for Industrielle Alliance Securities. Contact Industrielle Alliance Securities directly at accounttransfers@iaqto.ca. • NBIN Montreal processes all account ranges for outgoing transfers.
<p>Account Type:</p> <ul style="list-style-type: none"> • The last character determines the unique NBIN account. These characters may mean account different types for other IBM clients • All foreign currency accounts- except USD- are not ATON eligible and must be processed as blue dot transfers 	<p>A - CDN Cash B - USD Cash E - CDN Margin F - USD Margin G - CDN Margin Short H - USD Margin Short J - Income Sweep N - LIRA/LRSP O - Off Book - Mutual Fund Client held account P - Locked-in (LIF/LRIF etc.) R - Spousal RSP S - RRSP T - RIF W - TFSA X - Pledge/Collateral/Leverage Loan Account Y - Spousal RIF Z - RESP</p> <p>USD RIFF 4 USD TFSA 6 USD RRSP 7 USD Spousal RRSP 8 USD Locked IN (LIF/LRIF) 9</p>

The following ATON operating practices are specific to NBIN:

- 3.8.1 **Estate transfers.** NBIN accepts request for transfers in ATON to settle estate transfers (beneficiary) with the receipt of proper documentation.
- 3.8.2 **IPP transfers.** NBIN transfers out accepts IPP to IPP transfers in ATON with the receipt of proper documentation. **Note:** All other combinations will be blue-dotted.
- 3.8.3 **Escrow or Pledged accounts.** NBIN acts on escrow or pledged accounts with the receipt of proper documentation.

Transfer Out Fee

Transfer fee may vary depending on the account range.

Odlum Brown

3.9 Odlum Brown

Vendor	Broadridge
Contact Information	Odlum Brown Limited Transfer Department PH: 604-669-1600 FAX: 604-844-5413
Account Information	All account numbers are 8 digits. Starting with a 0 in the front. Transfers are processed in Vancouver, BC CDS CUID: OBLV DTC: 5074 MF Dealer: 9195

Odlum Brown Fee Based Accounts: - For the fee based account at Odlum Brown, the fees will be applied to the account when it is transferred, which may result in having a debit balance transferred.

Transfer Fee charges: - Odlum Brown charges \$120.00 + HST/GST for all full outbound transfers.

Debits greater than \$300: - Debits that are greater than \$300 must be approved by the Compliance Department.

Locked-in Agreements: - Odlum Brown will reject the transfer request if the locked in agreement is not received with in 48 hours.

Residual Balance: - Odlum Brown processes residual transfers twice monthly (mid – month and at month end).

Marriage Breakdown/Estate: - Accounts must be Blue Dot.

Rejected Mutual Fund Transfers: - If a mutual fund transfer is rejected by Odlum Brown , powers of attorney are issued manually and delivered to the receiving firm.

Joint & In Trust Account: - For joint accounts and in trust accounts, the second SIN must be indicated in the memo field.

Joint Account to Individual Account: - Accounts held jointly at Odlum Brown which are transferring to individual plans at the receiving institution, require copies of transfer forms to ensure all parties are aware of transfer. If all parties have not signed the transfer forms or Letter of Direction (LOD) the transfer will be rejected.

Informal Trusts of Minors: - If the account is held as an informal trust, all SIN's (i.e. the annuitant as well as the beneficiary) must be indicated in the memo field. Odlum Brown will not process inbound or outbound transfers of In Trust for Minor accounts to a non-in trust account, unless the non-trust account is in the name of the beneficiary who has reached the age of majority.

Informal Trust account to a Formal Trust acct: - If the account is held as a informal trust at Odlum Brown and is transferring to a Formal trust at the receiving institute, the trust agreement along with the transfer form must be provided to avoid delays.

All Corporate Accounts: Hard copy should be faxed to Odlum Brown for all corporate account transfers.

Peak Securities Inc.

3.10 Peak Securities Inc.

Vendor	RPM
Contact Information	PeakOperationsVMP@PeakGroup.com Telephone: 514-844-6911 Fax: 514-844-3739 Address 2000 Rue Mansfield Bureau 18th floor Montreal Quebec H3A 2Z5
Account Information	CDS CUID: PEAK/PEAV DTC Participant: 5040

Raymond James

3.11 Raymond James

Vendor	Dataphile
Contact information	CDS CUID: MSLT Inbound transfers: Email: transfersin@raymondjames.ca Outbound transfers: Email: transfersout@raymondjames.ca Fax: 604-654-1403

<p>Account information</p>	<p>Account numbers are eight characters in length, both alpha & numeric. The seventh (7th) character represents the account type:</p> <p>A= Cash CAD B = Cash USD C = COD CAD D = COD USD E = Margin CAD F = Margin USD K = TFSA P = Pledge R = RRSP S = Spousal RRSP T = RRIF U = Spousal RRIF V = PRIF W = LIF Y = RJF Stock Purchase Plan Z = RESP</p> <p>Account numbers where the eighth (8th) character is a “U” represents a USD currency registered plan account type.</p> <p>Account numbers where the first (1st) character is a “Z” represents “client name” holdings with mutual fund companies. Contact the respective mutual fund company.</p> <p>Accounts under Raymond James & Associates are administered by Raymond James Financial (US). Accounts under Raymond James (USA) Ltd are administered by Pershing LLC as custodian. Please contact these respective companies directly.</p>
<p>Fees</p>	<p>Transfer Out fees apply to all account types, both CAD and USD: Full Transfer Out = \$125.00 + applicable tax Partial Transfer Out = \$100.00 + applicable tax</p>
<p>Blue Dot/Manual Outbound Transfers</p>	<p>Raymond James accepts transfer forms via fax or email. Signature Guarantee is not required.</p>
<p>RFTs In Unconfirmed (UNC) ATON status</p>	<p>Raymond James does not change the status of ATON RFT’s in UNC status. The receiver must submit a New ATON RFT. If the asset list Returned includes an asset(s) which are not acceptable to the receiver, please change the RFT status to Rescind.</p>
<p>Residual Balances</p>	<p>Raymond James reviews accounts and will deliver Residual balances twice a month; on or after the 15th and on or after the 25th, but before the last business day of the month.</p>

Informal Minor Trust Accounts	Raymond James uses the SIN of the beneficiary. Indicate the name and SIN of the beneficiary in the Memo field of the ATON Header. Raymond James does not permit transfers from the minor trust to account(s) in the name(s) of the trustee(s). Transfers to a minor trust with same beneficiary or an individual account in the name of the beneficiary, when the individual has reached the age of majority/legal age, are permitted.
RESP Transfer Forms	Raymond James only accepts Form Part A and B <u>via fax</u> , not email.

RBC

3.12 RBC

Vendor	Broadridge
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The following ATON operating practices are specific to RBC:

- 3.12.1 **In kind holdings and assets.** If a firm cannot hold assets in kind, RBC returns the asset list with the following message in the MEMO field on the Asset Detail screen: Security to be sold for cash proceeds. When the receiving firm confirms the asset list as is, RBC sells the asset and transfers the cash. If the client did not request sale of the asset, the receiving dealer disputes the asset and the transfer status changes to unconfirmed. RBC then contacts the RBC branch to either approve or not approve the removal of the asset from the account. This results in the asset being re-added to or excluded from the asset list.
- 3.12.2 **Restricted securities.** Certain assets held at RBC, referred to as restricted securities, cannot be transferred out in kind or in cash. For restricted securities, the following message displays in the memo field on the Asset Detail screen: Restricted asset – Will not be delivered. If a client is not aware of a restriction, they will need to address this issue with the RBC Dominion Securities branch.
- 3.12.3 **GICs.** Investment confirmations or non-certificated issue confirmation letters and powers of attorney are issued and delivered to the receiving firm. In addition to the delivery ticket/panel, the delivering firm generating the GIC confirmations or NCI confirmation letter and powers of attorney must provide the following information on the GIC confirmation or NCI confirmation letter: issuer, certificate number, investment amount (quantity), interest rate, interest frequency, issue date, maturity date, and current registration.

RF Securities Clearing L.P.

3.13 RF Securities Clearing L.P.

Vendor	Dataphile
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<p>Contact information</p>	<p>CDS CUID: GMPT DTC: 5016 MF Dealer: 7673 E-mail: RWL-Accounttransfers@richardsonwealth.com Fax: (416) 941-0813 Account Transfer Department Phone Number: 416-969-4703 Address: 145 King St. West, Suite 200, Toronto, ON M5H 1J8 Custodian for International Securities and Options – Fidelity Clearing Canada</p>												
<p>Account information</p>	<p>The account numbers are 8 digits in length. The last digit (letter) identifies the account type. RF Securities Clearing holds the CAD and US currencies in separate account numbers.</p> <table border="1" data-bbox="552 718 1422 963"> <tr> <td>A/B - CAD/USD Cash</td> <td>Z – RESP</td> <td>U – Spousal RRIF</td> </tr> <tr> <td>E/F - CAD/USD Margin</td> <td>R – RRSP</td> <td>V – RRSP locked In</td> </tr> <tr> <td>G/H - CAD/USD Margin Short</td> <td>S – Spousal RRSP</td> <td>W – Locked In RRIF/RLIF</td> </tr> <tr> <td>J – TFSA</td> <td>T – RRIF</td> <td></td> </tr> </table>	A/B - CAD/USD Cash	Z – RESP	U – Spousal RRIF	E/F - CAD/USD Margin	R – RRSP	V – RRSP locked In	G/H - CAD/USD Margin Short	S – Spousal RRSP	W – Locked In RRIF/RLIF	J – TFSA	T – RRIF	
A/B - CAD/USD Cash	Z – RESP	U – Spousal RRIF											
E/F - CAD/USD Margin	R – RRSP	V – RRSP locked In											
G/H - CAD/USD Margin Short	S – Spousal RRSP	W – Locked In RRIF/RLIF											
J – TFSA	T – RRIF												

The following ATON operating practices are specific to RF Securities Clearing:

Outbound transfers

- **Proprietary Products:** Security names such as RPFL Kensington, RPFL Real Estate and RPFL RFG are private equities that are non-transferable. The transfer must be requested as partial indicating on the ATON memo field to leave the private equities behind.
- **Managed Accounts:** Final management fees must be charged prior to processing the transfer request. This process may take an extra day or 2 to be completed.
- **Address information:** RF Securities Clearing will adopt the business practice agreed upon on “Address Mismatch” Best Practice Process.
- **Estate Transfers:** RF Securities Clearing will process an Estate-to-Estate transfers on ATON provided receipt of documentation. Final approval from Estate Processing Dept is required.
- **IPP Transfers:** RF Securities Clearing can process IPP to IPP transfers on ATON. A Copy of the transfer form and a copy of the conditional / final approval letters from CRA confirming the registration of the IPP under the Income Tax Act.
- **Corporate Accounts:** RF Securities Clearing requires to verify the signing officers of the corporation. Please provide a copy of the transfer form or corporate resolution or indicate on the ATON panel the authorized signatories of the corporation.
- **Joint Account to Individual:** RF Securities Clearing requires a copy of the transfer form to verify that both or all parties signed off on the transfer out request.
- **RRIF/SPRIF/LIF/LRIF:** The final payment amount for the year is based on the option that the client selected - minimum, maximum (LIF/LRIF accounts) or elected payments. For transfer out requests where the account is NSF to pay the remaining RIF payment, the receiver must

indicate on the ATON memo panel that they are able to accept the debit balance OR provide the details of what assets to redeem; otherwise, the transfer will be rejected. On the rejected RFT, RF Securities will provide the amount required to complete the final payment.

- **RESP Accounts:** Transfer out must be in full. RF Securities Clearing will reject partial requests.
- **Locked In agreements:** RF Securities Clearing will adhere to the documented process on ATON best practice guide (16.0 – 16.3 LIRA) for transfers of locked in accounts.
- **Residual balances:** residual transfers are processed twice monthly.

Scotia Capital

3.14 Scotia Capital

Vendor	Broadridge
Contact information	For transfers from Scotia McLeod, Scotia McLeod Direct Investing, Trade Freedom or Scotiatrust/Cassels: Account Transfers Service Desk Telephone: 416-945-4524 Fax: 416-863-7518 ISS_Accounttransferservice@scotiacapital.com
Account information	N/A

The following ATON operating practices are specific to Scotia Capital:

- 3.14.1 **In cash requests.** Client is not contacted prior to taking market action.
- 3.14.2 **Corrections to errors.** Scotia does not reinstate or correct another firm's error (some exceptions may apply).
- 3.14.3 **Partial notices for mutual funds.** If a partial notice is set up for a mutual fund transfer, the number of units must be specified instead of the dollar value. If cash is to be used, the gross amount should be requested, not the net amount.
- 3.14.4 **Cash transfers.** Scotia only transfers Pinnacle funds and Scotia Cassels PCUs in cash (in kind transfers will be rejected by Scotia).
- 3.14.5 **BNS cashable GICs.** If a client has already taken a partial redemption and the request for transfer is in kind, the GIC will not be reregistered and the issuer will reject the request for re-registration. Upon receipt of the reject, firms must request the GIC in cash. Scotia Capital cannot act upon the original in kind transfer and will not redeem the GIC until they have received market action instructions from the receiving firm and/or client.
- 3.14.6 **RIF transfers.** Scotia, depending on the amount of the debit/RRIF payment may reject the request to send debit.
- 3.14.7 **RFT in accepted (ACC) status.** Scotia uses the ACC status when obtaining approval from other departments or when market action is required. The reason will be noted in the memo field in ATON.
- 3.14.8 **Foreign securities and cash held in currencies other than Canadian or U.S. dollars.** ATON does not support transfers of assets with currencies other than Canadian and U.S. dollars. If a delivering firm receives an ATON transfer request for an account with assets in a non-ATON eligible currency, the deliverer must advise the

receiver and request a copy of the transfer form with instructions for delivering these non-Canadian and non-U.S. dollar assets.

If the receiving firm is able to accept non-Canadian and non-U.S. dollar assets, they must provide a copy of the transfer form to the delivering firm.

If the receiving firm is not able to accept non-Canadian and non-U.S. dollar assets, the deliverer must process a partial transfer or reject the request for transfer.

Scotia Securities Inc. (SSI) Dealer Services

3.15 Scotia Securities Inc. (SSI) Dealer Services

Vendor	RPM
Contact information	Transfer inquiries: SCOS@scotiabank.com Fax: 416-288-4455 Mailing Address: 4715 Tahoe Blvd, Mississauga, ON, L4W 0B4
Account information	SSI Dealer Account numbers: 15 numeric digits in length (include all leading zeros). Example: 000000012367895 Products: SSI Dealer Accounts can hold the following products: <ul style="list-style-type: none"> • Cash – Canadian and U.S. • BNS mutual funds • Most third-party mutual funds • Scotiabank GIC products: these products are only transferable to other financial institutions upon maturity. If requested, a redeemable GIC can be transferred in cash. RESP accounts: RESP accounts are not processed by SSI Dealer Services. They are processed at the Scotiabank RESP Centre through the local Scotiabank branch. Transfer requests for RESP accounts are processed only at the RESP centre through local branches and cannot be processed through ATON.

TD Waterhouse

3.16 TD Waterhouse

Vendor	IBM
Contact information	Transfer Service line: Telephone: 1-866-404-5517 Fax: 416-413-3517 1-877-397-2332
Account information	CDS CUID: GIST TDW accounts are 7 digits in length with an Alpha in the 7th position. Transfer Fees for Partial and Full Transfers: \$135 plus applicable taxes.

The following ATON operating practices are specific to TD Waterhouse:

Outbound Transfers:

- 3.16.1 **Managed accounts Transfers (Private Investment Advice; Financial Planning and Institutional Services Accounts):** An extra 24 hours is required in order to calculate fees prior to the account being transferred out.
- 3.16.2 **TD E-series mutual funds** cannot be transferred in kind.
- 3.16.3 **TD 365 day or less term deposits** cannot be transferred.
- 3.16.4 **Estate transfers** must be blue-dot.
- 3.16.5 **Guarantee/Guarantor:** Must be transferred together.
- 3.16.6 **IPP and Marriage Breakdown Transfers:** Prior to initiating these transfers on ATON, documentation.

Inbound Transfers:

- 3.16.7 **F Series Funds:** Cannot be held in a Direct Investing Account (RR Code **RM**) or Financial Planning Account (RR Code **FP**)
- 3.16.8 **BTB Funds:** Cannot be held in a Directing Investing Account (RR Code **RM**)
- 3.16.9 **RRSP Accounts with USD Cash:** TDW RRSP accounts cannot hold USD cash and approval is required to convert to CDN Currency.
- 3.16.10 **TFSA ACCOUNT:** Cannot accept any SBIT (Small Business)
- 3.16.11 **Segregated Funds:** Cannot be held in a Direct Investing Account (RR Code **RM**)
- 3.16.12 **Guarantee/Guarantor:** TDW verifies both US and CDN accounts prior to accepting the asset listing and will reject the entire transfer if approval not received for both USD and CDN.
 - **It is the policy of TD to accept all assets when a full transfer is requested. If there are situations whereby a Security cannot be accepted, the Delivering Firm will be advised accordingly.**

VMD Desjardins

3.17 VMD Desjardins

Vendor	IBM
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Contact information	<p>For Desjardins Financial Services Firm (Desjardins Cabinet de Services Financiers):</p> <p>Desjardins Cabinet de Services Financiers Inc./ Placements stratégiques</p> <ul style="list-style-type: none"> – Série de comptes : 45-##### à 49-##### – IDUC à la CDS : DESA – Fonds communs de placement et titres à revenus fixes seulement – Adresse : <ul style="list-style-type: none"> DCSF Placements stratégiques 2, Complexe Desjardins CP 900, succursale Desjardins Montréal (Québec) H5B 1H5 – Téléphone : 514 286-3442 ou 1 877 286-3442 – Courriel : requetes.ssc@desjardins.com – Télécopieur : 514 987-7145 ou 1 877 987-7145
	<p>For Desjardins Securities (Valeurs Mobilières Desjardins) or Disnat or Disnat Direct:</p> <ul style="list-style-type: none"> – Account range: All other client accounts – CDS CUID: VMDM – IPBOSD / VPAGPP - 1 Complexe Desjardins CP 800 Succursale Desjardins Montréal Québec H5B 0B1 – Gestion des transferts CC1820 HH06 – Telephone: 514-286-5889 or 1-877-286-5889 – Fax: 514-842-4929 – Email for account range 1,2,5,6 Disnat): Transferts_disnat@desjardins.com – Email for all other account range (VMD): Transferts_VMD@desjardins.com
	<p>For Fiducie Desjardins Private Management (Gestion privée Fiducie Desjardins):</p> <ul style="list-style-type: none"> – Account range: Numeric client accounts (no letters) – CDS CUID: DESM – IPBOSD / VPAGPP - 1 Complexe Desjardins CP 800 Succursale Desjardins Montréal Québec H5B 0B1 – Gestion des transferts CC1820 HH06 – Telephone: 514-286-3442 or 1-877-286-3442 – Fax: 514-286-3123

The following ATON operating practices are specific to Desjardins:

- 3.17.1 Desjardins or Caisse Populaire GICs and term deposits are not transferable in kind.** The client must decide prior to initiating the transfer whether the GIC or term deposit is going to:

- 3.17.1.1 be cashed – this produces a mixed transfer request, or
- 3.17.1.2 remain with VMD Desjardins – the transfer should be initiated as a partial account transfer.
- 3.17.2 **Restricted accounts.** If the client account is coded as restricted (i.e., group RSP, compliance or legal issues), VMD's transfer department must obtain written authorization from their internal sectors prior to processing the transfer.
- 3.17.3 **Guarantee and guarantor accounts.** Both guarantee and guarantor transfer requests require additional approvals from VMD's internal sectors prior to processing the transfer.
- 3.17.4 **Debits greater than \$300.** For all asset lists which are returned with cash debits greater than \$300, VMD's transfer department must obtain written authorization from their internal sectors prior to processing the transfer.
- 3.17.5 **Derivatives (options, calls and puts).** VMD and Disnat accounts only. For all asset lists containing a derivative product, VMD's transfer department holds the matching common stocks until all derivative products are accepted and transferred to the receiving firm. The transfer of derivative products is processed by VMD's derivatives department.



INVESTMENT INDUSTRY ASSOCIATION OF CANADA
ASSOCIATION CANADIENNE DU COMMERCE DES VALEURS MOBILIÈRES

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