

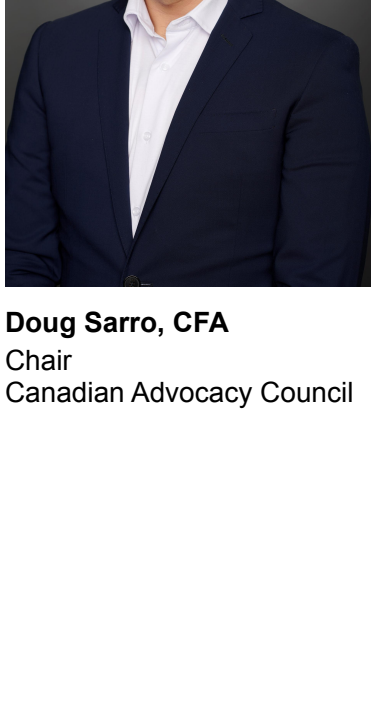
## Canadian Advocacy Newsletter

June 2025

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## Chair Summary

## Canadian Advocacy Council



**Doug Sarro, CFA**  
Chair  
Canadian Advocacy Council

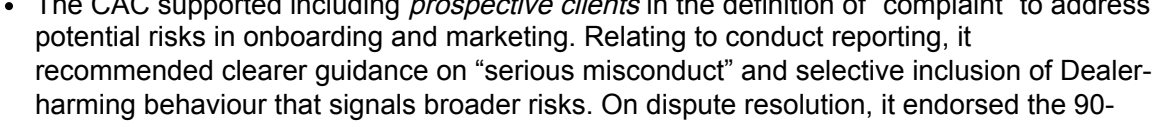
With summer very much in swing, the CAC is set to take a bit of a breather as we wrap up our fiscal year. It's been a busy one, with the CAC submitting a total of 18 comment letters to Canadian securities regulators. We've maintained our advocacy for evidence-based, standardized, decision-useful disclosures and enhanced investor protections, and for the importance of elevating the integrity of capital markets and building investor trust. Even if regulators don't always agree with our views, there is value in getting them on the record—with changes in outside circumstances and the political climate, we have confidence they will prove influential over the longer term.

As mentioned in my last message, at the end of this month, I will be passing the baton as Chair to [Kevin Dickinson, CFA](#), who will be joined on the executive by [Andrew Pennington, CFA, CIPM](#), as Vice Chair. I'm so glad Kevin and Andrew have agreed to step into these roles, and I look forward to supporting their leadership.

I also want to recognize our three departing members: [David Stanton, CFA](#), who has served on the CAC since 2019; [Kathryn Laflamme, CFA](#), who is stepping away to take on additional leadership responsibilities with CFA Society Ottawa; and [Parham Nasser, CFA](#), who has served on CAC since 2016—including two years of service as Chair and three years as Vice Chair—and will be continuing his tireless advocacy for retail investor interests on the OSC's Investor Advisory Panel. I speak for all CAC members in saying how deeply grateful we are for all their contributions and hard work.

## Published Letters

## Canadian Advocacy Council



## CIRO's Phase 5 Rule Consolidation Consultation

Filed June 25, 2025

The Canadian Advocacy Council (CAC) responded to CIRO Bulletin 24-0276, commending CIRO's progress on harmonizing regulatory requirements through its Phase 5 rule consolidation project. The CAC emphasized the importance of clear guidance and adequate transition periods to support effective implementation and in maintaining investor protection.

Highlights of the CAC's Submission:

- The CAC supported including *prospective clients* in the definition of "complaint" to address potential risks in onboarding and marketing. Relating to conduct reporting, it recommended clearer guidance on "serious misconduct" and selective inclusion of Dealer-harming behaviour that signals broader risks. On dispute resolution, it endorsed the 90-day response and internal dispute resolution timeframes as appropriate, encouraging prompt resolution. For dealer capital reporting, it supported a scalable model, and supported look-through for diversified funds while noting risks in niche or illiquid strategies.

The CAC affirmed its view that the DC Rules reflect the project's objectives without introducing undue burden, and praised CIRO's engagement with stakeholders through the process.

## Response Drafting in Progress

## Canadian Advocacy Council

## OSC Proposes New Restrictions on Short Sellers Participating in Offerings

Due September 3, 2025

The Ontario Securities Commission (OSC) is seeking public comment on proposed amendments to OSC Rule 48-501 and related changes to the Companion Policy (48-501CP).

The Proposed Amendments would prohibit investors who made short sales of a security in the five business days prior to the pricing of a prospectus offering or private placement from purchasing securities in that same offering, even if:

- They were unaware of the offering,
- The offering did not represent a material fact or change,
- Or the short sale had no effect on the market price.

Exemptions may apply in certain cases.

## CSA Launches Consultation on ETF Regulatory Framework

Due October 17, 2025

The Canadian Securities Administrators (CSA) have published a consultation paper examining whether the current regulatory framework for exchange-traded funds (ETFs) remains appropriate, given the sector's rapid growth and unique features.

Key areas of focus include:

- Secondary market trading and liquidity
- Creation/redemption mechanisms involving authorized dealers
- The ETF arbitrage process
- Investor access to U.S. and foreign ETFs through brokerage and fund structures

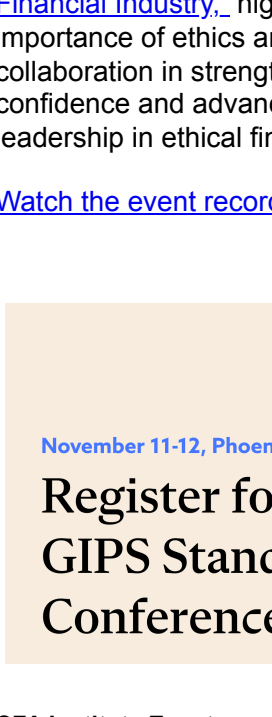
The consultation draws on findings from a recent OSC study and international best practices from IOSCO. ETFs in Canada have grown to \$518B AUM as of year-end 2024, with strong retail participation, a trend the CSA expects to continue.

Stakeholders are encouraged to share their views on regulatory enhancements and cross-border ETF access.

**\*\*If you would like to participate or provide comments to ongoing initiatives, please contact [cac@cfacanada.org](mailto:cac@cfacanada.org)\*\***

## Volunteer Spotlight

## Canadian Advocacy Council



## Doug Sarro, Chair

Doug Sarro, CFA, has been a valued member of the Canadian Advocacy Council (CAC) since December 2019, and has served as Chair from July 2023 to June 2025. As his term as Chair concludes, we thank Doug for his outstanding leadership and thoughtful contributions during a time of evolving regulatory priorities in Canada. We're pleased he will continue serving on the Council.

Doug is a law professor at the University of Ottawa, where his research focuses on business law and innovation. Prior to academia, he practiced corporate law at Sullivan & Cromwell LLP in New York and was a senior advisor at the Ontario Securities Commission. He earned his JD from Osgoode Hall Law School as gold medallist and is admitted to practice law in both New York and Ontario. Doug became a CFA charterholder in 2019.

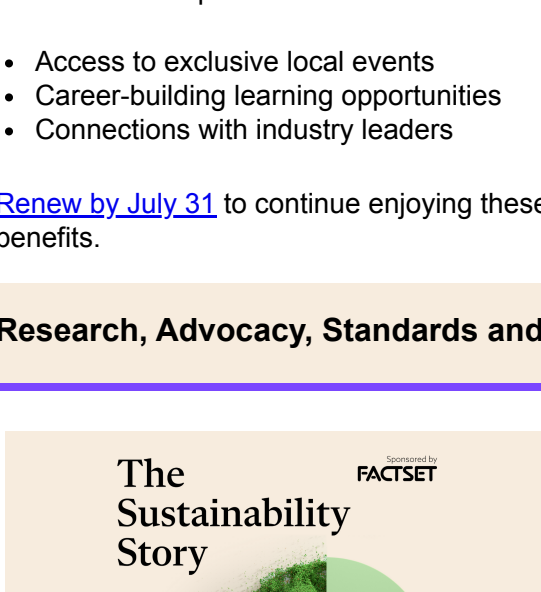
## Looking to the future, where do you think the CAC's contributions might be most needed?

"We bring the investor perspective to policy-making, something that's not always prioritized in Canadian regulatory circles, but for that very reason, it's especially important. While reducing regulatory burden and fostering capital formation are worthwhile goals, regulators must be careful not to erode confidence in our capital markets. By contributing informed, investor-focused views, the CAC helps regulators avoid unintended and undesirable policy outcomes."

## What would you tell another Canadian CFA charterholder about the CAC?

"It's a unique opportunity to see how financial regulation is shaped, up close. More importantly, it allows you to use the analytical skills and perspective you've developed as a CFA charterholder to help improve the quality and integrity of financial policy in Canada."

## News



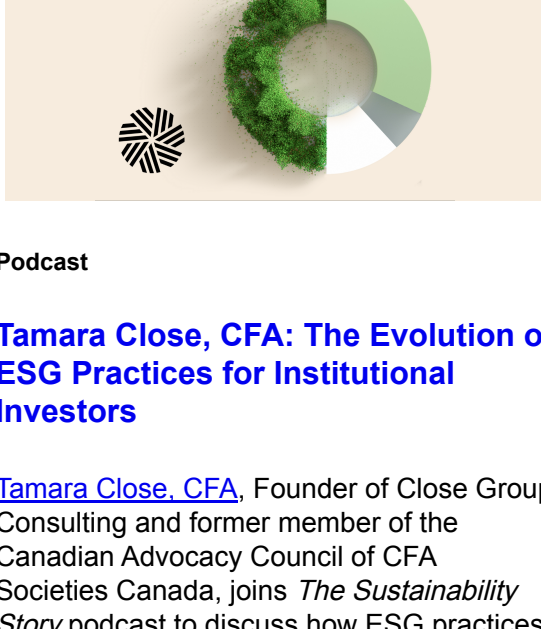
CFA Societies Canada News

## Event Recording: Canadian Club Event on Ethical Leadership

On June 9, Michael Thom, CFA, Managing Director of CFA Societies Canada, joined a distinguished panel hosted by Canadian Club Toronto to explore how financial professionals can lead with integrity amid global uncertainty and fractured trust.

The event, ["Ethical Leadership: A Competitive Advantage for Canada's Financial Industry,"](#) highlighted the importance of ethics and cross-sector collaboration in strengthening public confidence and advancing Canada's leadership in the ethical finance.

[Watch the event recording.](#)



## Thank You to Departing Volunteers

CFA Societies Canada News

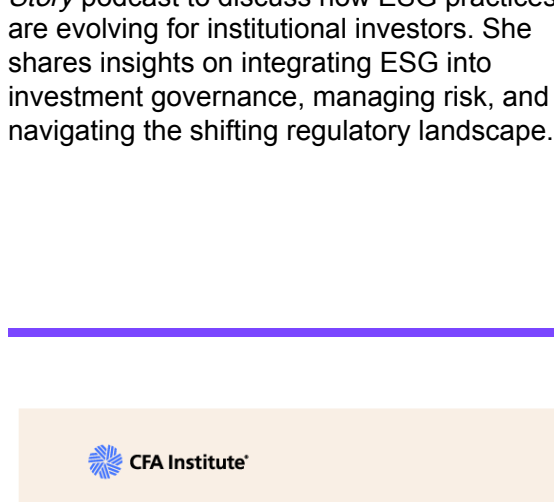
## Thank You to Departing Volunteers

CFA Societies Canada extends its sincere gratitude to the following volunteers for their years of dedicated service and leadership:

- [Parham Nasser, CFA](#), [David Stanton, CFA](#), and [Kathryn Laflamme, CFA](#) – *Canadian Advocacy Council (CAC)*
- [Kenrick Ohid, CIPM](#) and [Bradley Sinclair, CFA, CIPM](#) – *Canadian Investment Performance Council (CIPC)*

Your contributions have made a lasting impact on our advocacy and investment performance efforts across Canada.

Thank you for your commitment to upholding the highest standards in our profession.



CFA Institute Events

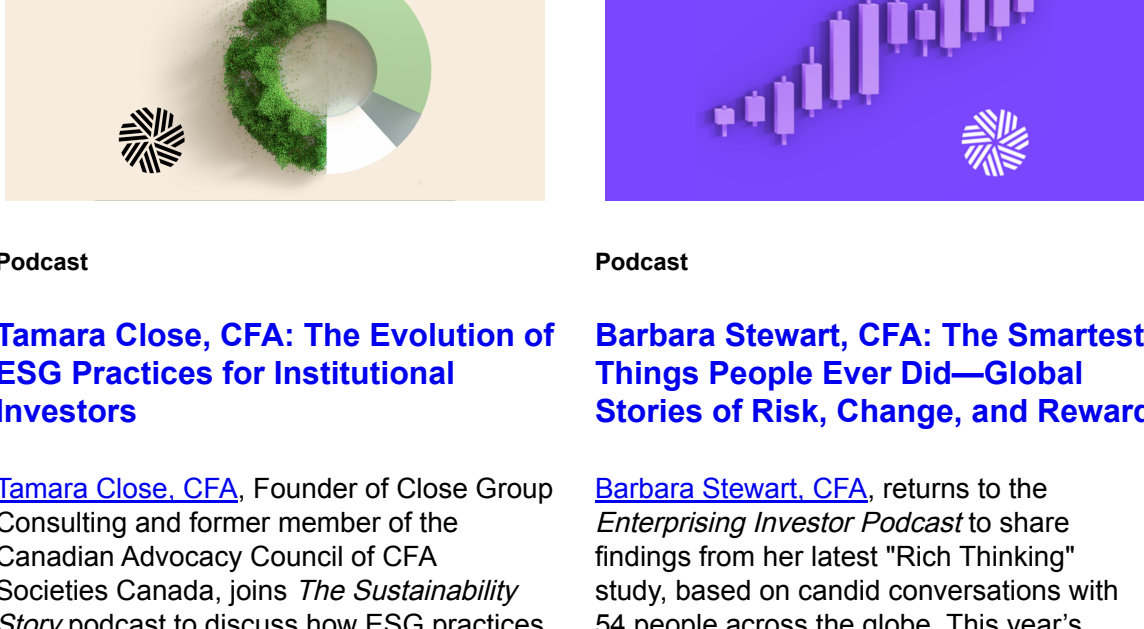
## Registration Now Open: 29th Annual GIPS® Standards Conference | November 11–12 | Phoenix, AZ

Join global investment performance and regulatory experts in Phoenix for the 29th Annual GIPS® Standards Conference.

Explore timely topics including:

- Best practices for GIPS standards compliance
- SEC Marketing and Private Fund Adviser rules and related exam matters
- The role of AI in investment management

[Register now!](#) Early bird rates available through July 6!



## CIPC PERFORMANCE TOPIC: Peer Universe Reporting

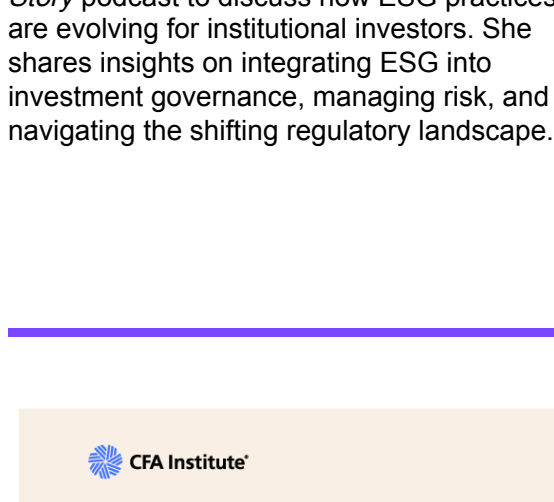
CFA Societies Canada News

## CIPC Performance Topic on LinkedIn

## Understanding Peer Universe Reporting in Investment Performance

How should peer universe data be used—and not used—when evaluating investment performance?

Check out this insightful [LinkedIn post](#) from the Canadian Investment Performance Council (CIPC) of CFA Societies Canada that breaks down key considerations around peer universe reporting, including its value, limitations, and best practices in performance presentations.



CFA Institute News

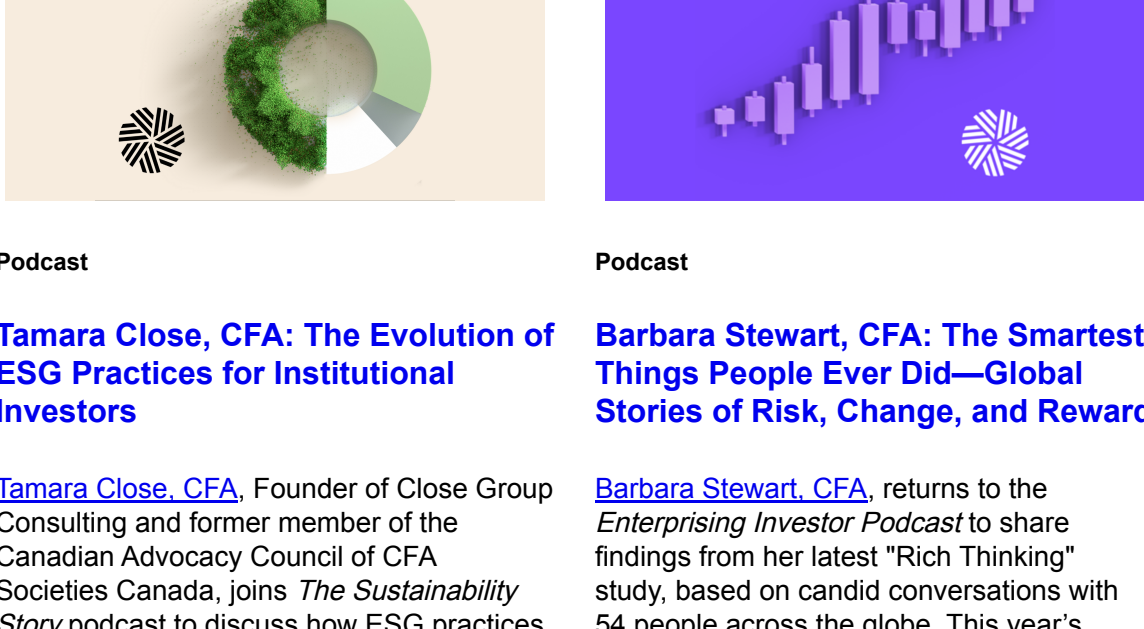
## Time to Renew Your CFA Institute and Local Society Membership

Thank you for being a valued part of our community this past year. Renewing your membership with CFA Institute and your local society keeps you connected to a global network of investment professionals and supports your ongoing professional development and commitment to ethics.

Your membership includes:

- Access to exclusive local events
- Career-building learning opportunities
- Connections with industry leaders

[Renew by July 31](#) to continue enjoying these benefits.



## AMC and GIPS Compliance Notification Deadline

CFA Institute News

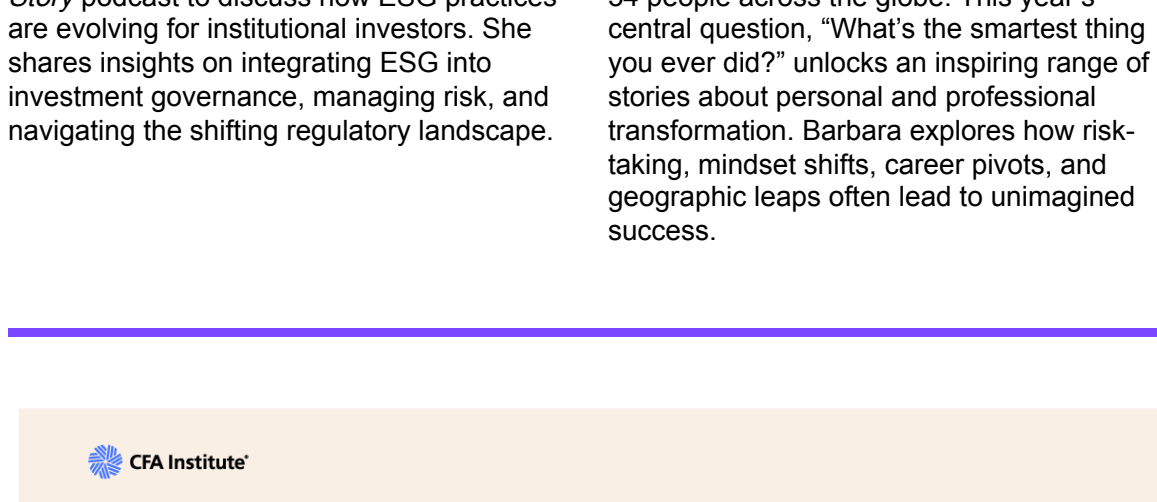
## Reminder: AMC and GIPS Compliance Forms Due June 30

Firms claiming compliance with the CFA Institute Asset Manager Code™ (AMC) and/or the Global Investment Performance Standards (GIPS) must submit their annual compliance notification forms by **June 30**.

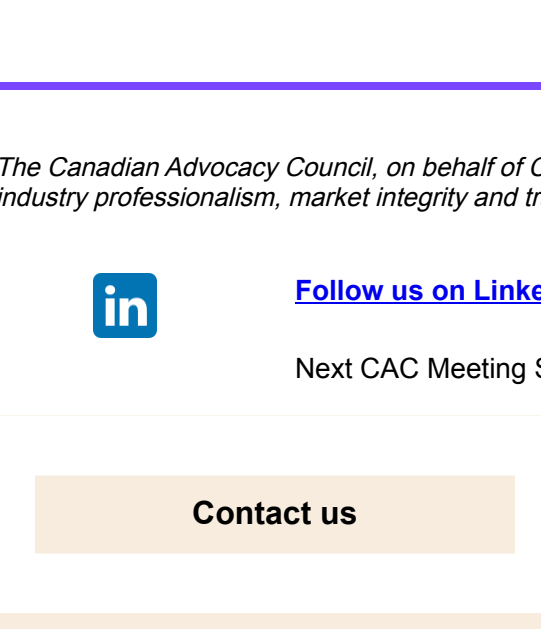
Stay current and maintain your firm's commitment to industry best practices—submit your form(s) today.

Submit your notification form:

- [AMC Compliance](#)
- [GIPS Compliance](#)



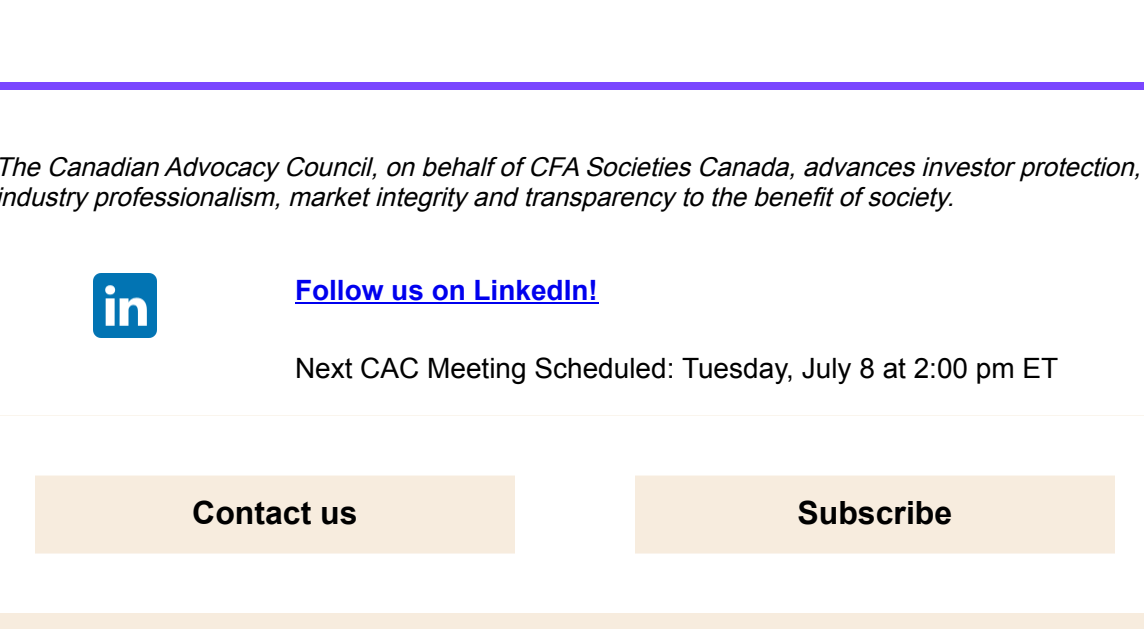
## Research, Advocacy, Standards and Professional Learning



Podcast

## Tamara Close, CFA: The Evolution of ESG Practices for Institutional Investors

[Tamara Close, CFA](#), Founder of Close Group Consulting and former member of the Canadian Advocacy Council of CFA Societies Canada, joins *The Sustainability Story* podcast to discuss how ESG practices are evolving for institutional investors. She shares insights on integrating ESG into investment governance, managing risk, and navigating the shifting regulatory landscape.



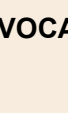
Podcast

## Barbara Stewart, CFA: The Smartest Things People Ever Did—Global Stories of Risk, Change, and Reward

[Barbara Stewart, CFA](#), returns to the *Enterprising Investor Podcast* to share findings from her latest "Rich Thinking" study, based on candid conversations with 54 people across the globe. This year's central question, "What's the smartest thing you ever did?" unlocks an inspiring range of stories about personal and professional transformation. Barbara explores how risk-taking, mindset shifts, career pivots, and geographic leaps often lead to unimagined success.



The Canadian Advocacy Council, on behalf of CFA Societies Canada, advances investor protection, industry professionalism, market integrity and transparency to the benefit of society.

[Follow us on LinkedIn!](#)

Next CAC Meeting Scheduled: Tuesday, July 8 at 2:00 pm ET

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ADVOCACY

COLLABORATION

COMMUNICATION

INNOVATION

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