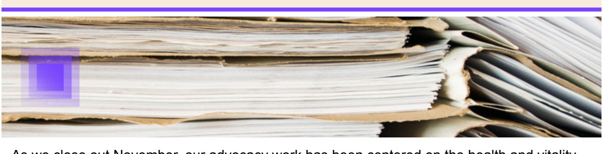
CFA Societies Canada

Canadian Advocacy Newsletter
November 2025

Subscribe

Monthly Summary



As we close out November, our advocacy work has been centered on the health and vitality of the Canadian investment ecosystem and the case for entrepreneurship in asset management both with government and regulators, centered on ensuring that Canada's policy and regulatory environment supports growth, competitiveness, clarity and innovation across the investment ecosystem. As we've written previously, we were delighted by the Government of Canada's nod in Budget 2025 to the contributions to economic development by the asset management sector, and the need to support emerging fund managers to build the next generation of global-champion businesses in Canada.

We are using this recognition to power our continued efforts advocating for entrepreneurship, competition, and innovation with multiple governments and regulators across Canada in partnership with our peer organizations in the Canadian Asset Management Entrepreneurship Alliance. We continue to advocate that Canada needs to urgently chart its own course for the investment and financial services sector within the context of renewed concerns about economic sovereignty, and the government's many identified needs for capital deployment and investment at-scale – where our profession and industry is a necessary partner. We remain concerned (and vocal) that our lack of interprovincial regulatory harmonization will make it difficult to be as dynamic and responsive in Canada as some of these changes abroad should demand, and that our regulatory structures that focus on process perhaps over outcomes don't serve this moment. We need to work harder to meet this moment by being dynamic, harmonized, and ambitious.

This month, the Canadian Advocacy Council provided detailed feedback to the Ontario Securities Commission on its Draft Action Plan for Truth and Reconciliation, highlighting the importance of leadership accountability, Indigenous representation and the integration of Indigenous investors into policy considerations. The Council also responded to CIRO's proposed updates for Order Execution Only accounts, emphasizing stronger safeguards, clearer expectations and a more agile, principles-based approach. Looking ahead, our focus shifts to several in-progress responses, including the CSA consultations on venture issuer semi-annual reporting and the proposed harmonized self-certified investor exemption, along with CIPC's work on the Exposure Draft for best practices in return attribution reporting.

We continue to prepare for the implementation of CIRO's new proficiency model, which takes effect on January 1 and includes significant positive changes to exam exemptions for CFA Program candidates and CFA charterholders. CFA charterholders or recent passers of the Level 1 exam will be able to avail themselves of an exemption for the new introductory CSIE exam, and either of the new qualifying 'segment' exams – Retail or Institutional. This process runs through the CIRO dealer member firm at the time of registration, so there's no action to take on an individual level to qualify or apply. Please see CIRO's proficiency website for more details on the new model, and this link for a member and candidate-focused FAQ from CFA Institute.

We also encourage you to explore the findings of our inaugural Annual Canadian Endowment and Foundation Survey (see below) – in collaboration with Mercer Canada, which offers new and unique insights for Canadian not-for-profit investing organizations and their advisors and partners.

As we head into the end of the year, both our proactive outreach agenda and responsive commentary plates are full, and we are looking forward to reviewing the imminent decision from the Supreme Court of Canada in *Lundin v. Markowich* – where we'll have more to say soon.

Thank you for your continued engagement with our policy and standards work as we advance a more coordinated, ambitious, and forward-looking vision for Canadian capital markets.

Michael Thom, CFA
Managing Director
CFA Societies Canada

Published Letters — Canadian Advocacy Council

Feedback on OSC's Draft Action Plan for Truth and Reconciliation

Submitted November 4, 2025

The CAC expressed strong support for the Ontario Securities Commission's (OSC) draft Action Plan for Truth and Reconciliation (APTR), commending its five-pillar structure and leadership in aligning reconciliation efforts with capital markets. Drawing on input from Indigenous leaders and perspectives, the CAC emphasized the importance of a thoughtful, structured approach that integrates Indigenous voices into both policy and organizational culture.

Key highlights from CAC's response:

- **Leadership and Accountability**: Called for clear, senior-level ownership of APTR implementation, including defined KPIs and public reporting by both the organization and relevant divisions.
- **Indigenous Investors**: Recommended expanding the APTR's scope to consider Indigenous Peoples specifically as investors, not only as general participants in capital markets.
- **Advisory Structure**: Suggested creating a dedicated Indigenous Advisory Committee, rather than integrating Indigenous members into existing advisory bodies, to support systemic and cultural change.
- **Experiential Learning**: Advocated for sustained, experiential learning opportunities for OSC staff and leadership (including Tribunal members), particularly with a province-wide focus beyond Toronto.
- **Thought Leadership**: Encouraged the OSC to pursue proactive, consultative research initiatives on regulatory and capital markets issues affecting Indigenous Peoples—such as rights-holder consultation in disclosure guidance and barriers to registration and market access.
- **Standards Development**: Recommended that the OSC engage in aligning Indigenous-related reporting standards with international frameworks like those from the ISSB, enhancing consistency in both financial and non-financial disclosures.

CIRO Proposes Updated Guidance on Order Execution Only (OEO) Accounts

Submitted November 10, 2025

The Canadian Advocacy Council (CAC) responded to CIRO's proposed new guidance on Order Execution Only (OEO) account services and activities, expressing overall support for the shift toward a principles-based regulatory framework. The CAC welcomed CIRO's responsiveness to prior recommendations, particularly regarding platform configuration oversight, enhanced model-portfolio functionality, and caution around finfluencers and copy-trading tools. The CAC encouraged ongoing agile updates to the guidance in response to industry developments.

Q1 – Additional safeguards: The CAC recommended multiple enhancements to bolster investor protection, including outcome-based justifications for dealer defaults, formal governance and documentation for configurations, conflict-of-interest controls, audit trails, monitoring frameworks, oversight for third-party content, and opt-in/opt-out mechanics for defaults.

Q2 – Sample portfolios and asset allocation tools: While supportive of CIRO's approach, the CAC urged added safeguards, such as neutral-shelf requirements, restrictions on promotional mechanics, monitoring for excessive trading tied to model updates, and a preference for registrant-sourced models.

Q3 – Examples of decision-making supports: The CAC supported the idea of a living guidance document with illustrative analyses. It recommended decision-tree examples for tools such as model portfolios, self-assessments, filters, gamification, and copy-trading, to help clarify what constitutes a prohibited recommendation.

Q4 – Product shelf limitations and proprietary product conflicts: The CAC agreed that restricting product offerings to proprietary or affiliated products effectively constitutes a recommendation and is inconsistent with the OEO model. Such business models should be reconsidered for a non-OEO dealer category. The CAC was critical of the idea that tools could remain compliant if offering only a few product options, reiterating the importance of product neutrality in the OEO space.

Response Drafting in Progress — Canadian Advocacy Council

CSA Seeks Feedback on Venture Issuer Semi-Annual Reporting Pilot

Due December 22, 2025

The Canadian Securities Administrators (CSA) are launching a multi-year pilot allowing eligible venture issuers on the TSXV and CSE to voluntarily adopt semi-annual financial reporting. The initiative aims to reduce reporting costs while maintaining transparency.

CSA Consults on Harmonized Self-Certified Investor Prospectus Exemption

Due January 5, 2026

Securities regulators across 11 Canadian jurisdictions have published a Notice and Request for Comment on Proposed Multilateral Instrument 45-111, which would harmonize the self-certified investor prospectus exemption. The proposal builds on successful local exemptions and is intended to expand capital-raising opportunities for businesses while allowing eligible investors with relevant experience or expertise to participate more broadly.

If adopted, the harmonized rule would replace existing provincial and territorial blanket orders, set an annual $50,000 investment cap for self-certified investors, and operate alongside the accredited investor exemption.

Response Drafting in Progress — Canadian Investment Performance Council

CFA Institute Seeks Feedback on Exposure Draft Guide for Best Practices in Return Attribution Reporting

Due December 12, 2025

CFA Institute is seeking public comments on its *Exposure Draft of the Guide for Best Practices in Return Attribution Reporting*. The proposed Guide focuses on ex post return attribution, analyzing historical performance to identify sources of added value, and aims to establish best practices for fair presentation and full disclosure of attribution information in marketing and client reporting materials.

****If you would like to participate or provide comments to ongoing initiatives, please contact cac@cfacanada.org****

Volunteer Spotlight — Canadian Investment Performance Council

Paul Boaden, CFA, CIPM
CIPC Member since 2019.

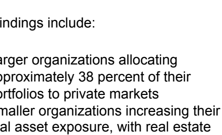
Paul Boaden, CFA, CIPM, has been a dedicated member of the Canadian Investment Performance Council (CIPC) since 2019, bringing deep expertise in performance measurement and investment analytics to the Council's national work. Paul is Director, Performance and Analytics at RBC Global Asset Management in Toronto, where he leads a global team responsible for performance calculation, attribution analysis, ex-post risk reporting and multi-asset portfolio characteristics. He also oversees RBC GAM's firm-wide compliance with the GIPS® standards and its annual verification process. Before joining RBC GAM in 2006, Paul spent five years with State Street Canada. He became a CFA charterholder in 2006 and earned the CIPM designation in 2010.

Paul was drawn to the CIPC by the opportunity to collaborate with talented and passionate performance professionals from across Canada, as well as to advocate for the challenges and opportunities facing Canadian investment managers implementing the GIPS Standards®. The ability to connect with peers, share perspectives and strengthen industry practices continues to be a rewarding part of his volunteer experience.

Reflecting on the value of volunteering, Paul notes:
"The CIPC brings together like-minded professionals who are committed to advancing best practices and promoting the adoption of the GIPS standards in Canada. The discussions are open, collaborative and focused on improving outcomes for both firms and investors."

Paul is particularly passionate about the role the GIPS standards play in promoting transparency and fairness across global markets. As investment management becomes increasingly complex and clients evaluate managers across borders, he sees the GIPS standards framework as essential in providing reassurance that performance is measured consistently and that managers are being compared on a true apples-to-apples basis

News



CFA Society Canada News

Annual Endowment and Foundation Survey 2025

CFA Societies Canada is pleased to have collaborated with Mercer Canada on the first Annual Endowment and Foundation (E&F) Survey. The 2025 report provides a detailed look at how Canadian not-for-profit organizations are allocating capital, navigating private and real assets and managing long-term return needs.

Key findings include:

- Larger organizations allocating approximately 38 percent of their portfolios to private markets
- Smaller organizations increasing their real asset exposure, with real estate allocations now exceeding 11 percent
- A median five-year return of 7.6 percent, below the estimated 9.15 percent required to maintain purchasing power after inflation, disbursements and expenses

The full report offers valuable benchmarking insights to support stronger investment governance across the sector.

CIRO Canadian Investment Regulatory Organization

Industry News

CFA Program Recognized Under New CIRO Proficiency Model

Beginning January 2026, CIRO's new proficiency model will formally recognize the CFA Program as meeting several pre-approval proficiency requirements for investment-industry licensing in Canada. This update reflects the continued relevance of the CFA Program in supporting high standards of competency across the Canadian financial system.

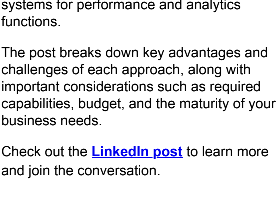
Under the new model, passing Level I of the CFA Program will qualify as an acceptable pre-approval proficiency requirement for the Associate Portfolio Manager category, subject to CIRO's experience criteria. This recognition also provides automatic exemption from several CIRO licensing exams, including the Canadian Investment Regulatory Exam (CIRE), the CIRO Institutional Securities Exam and the CIRO Retail Securities Exam. These exemptions fall under CIRO IDPC Rules 2603(1)(i)(g), 2627(3) and 2628(1).

These changes may streamline the entry pathway into CIRO-regulated roles such as Registered Representative (Retail and Institutional) and Investment Representative, while continuing to reinforce strong governance and professional standards across the sector.

Additional information on CIRO's proficiency model and related rule updates can be found here:

- CIRO guidance on the new proficiency model
- CFA Institute summary of Canadian exam exemptions

These developments highlight the ongoing role of the CFA Program in supporting Canadian financial markets by aligning global qualification standards with local regulatory requirements.



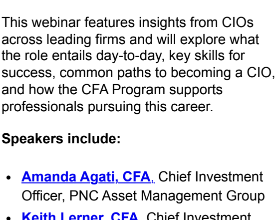
CIPC News

New from the CIPC: Performance and Analytics Solutions: All-in One vs. Multiple

The Canadian Investment Performance Council has released its latest performance topic on LinkedIn, exploring the pros and cons of all-in-one solutions versus multiple systems for performance and analytics functions.

The post breaks down key advantages and challenges of each approach, along with important considerations such as required capabilities, budget, and the maturity of your business needs.

Check out the **LinkedIn post** to learn more and join the conversation.



CFA Institute Webinar

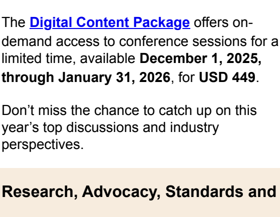
Upcoming Webinar: CFA® Program Career Paths – Chief Investment Officer

Join on **16 December 2025 from 8:00 to 9:00 AM EST** for the next session in the CFA Program career paths series, focusing on the role of the **Chief Investment Officer (CIO)**.

This webinar features insights from CIOs across leading firms and will explore what the role entails day-to-day, key skills for success, common paths to becoming a CIO, and how the CFA Program supports professionals pursuing this career.

Speakers include:

- **Amanda Agati, CFA,** Chief Investment Officer, PNC Asset Management Group
- **Keith Lerner, CFA**, Chief Investment Officer, Truist Wealth
- **Bob Michele, CFA**, Chief Investment Officer, J.P. Morgan Asset Management



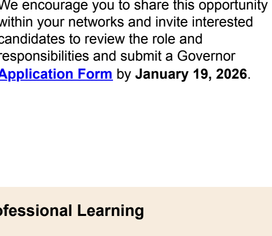
CFA Institute News

Missed the 2025 GIPS® Standards Conference? Access the Digital Content Package

If you couldn't join in Phoenix for the 29th Annual GIPS® Standards Conference, you can still benefit from the insights shared by leading performance and compliance experts.

The **Digital Content Package** offers on-demand access to conference sessions for a limited time, available **December 1, 2025, through January 31, 2026**, for **USD 449**.

Don't miss the chance to catch up on this year's top discussions and industry perspectives.



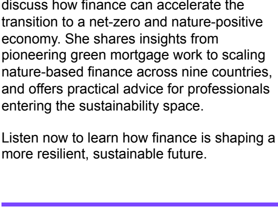
CFA Institute News

Call for CFA Institute Board of Governors Nominations

The Nominating and Governance Committee of the CFA Institute Board of Governors is now accepting applications for candidates to serve a three-year term on the board.

We encourage you to share this opportunity within your networks and invite interested candidates to review the role and responsibilities and submit a Governor **Application Form** by **January 19, 2026**.

Research, Advocacy, Standards and Professional Learning

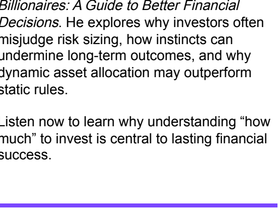


Podcast

Emma Harvey Smith: Mobilizing Global Capital for a Sustainable Future

In the latest episode of T*he Sustainability Story*, Emma Harvey Smith, Managing Director of Partnerships at the Green Finance Institute, joins host Paul Moody to discuss how finance can accelerate the transition to a net-zero and nature-positive economy. She shares insights from pioneering green mortgage work to scaling nature-based finance across nine countries, and offers practical advice for professionals entering the sustainability space.

Listen now to learn how finance is shaping a more resilient, sustainable future.



Podcast

Victor Haghani: From The Missing Billionaires to Smarter Risk and Better Decisions

Victor Haghani, cofounder of Long-Term Capital Management and founder of Elm Wealth, joins host Mike Wallberg, CFA, to discuss the ideas behind *The Missing Billionaires: A Guide to Better Financial Decisions*. He explores why investors often misjudge risk sizing, how instincts can undermine long-term outcomes, and why dynamic asset allocation may outperform static rules.

Listen now to learn why understanding "how much" to invest is central to lasting financial success.

Follow us on LinkedIn!

Contact us | Subscribe

ADVOCACY COLLABORATION COMMUNICATION INNOVATION

CFA Societies Canada
120 Adelaide Street West, Suite 2205, Toronto, ON M5H 1T1
T 416.366.3658
www.cfacanada.org