



May 26, 2025

VIA EMAIL

Theodora Lam

Director, Market Regulation Policy
Canadian Investment Regulatory Organization
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Dear Ms. Lam:

Re: Notice 25-0001 - Proposed Amendments Respecting Mandatory Close-Out Requirements

Thank you for the opportunity to comment on the proposed amendments related to mandatory close-out requirements for failed trades.

We support CIRO's objective to strengthen market discipline and improve settlement efficiency. The introduction of a mandatory close out regime is a positive step that will enhance post trade processes and bring Canadian practices more in line with US regulations. We believe this alignment will contribute to greater operational consistency and reduce settlement risk across North American markets.

While we are supportive of the proposal we would like to highlight key considerations for effective implementation.

1. Operational Readiness and implementation timeline- A transition of this magnitude will require meaningful system and process changes. We encourage CIRO to adopt a phased or flexible implementation timeline to ensure industry participants can prepare adequately.
2. Scope and exceptions – We suggest that CIRO consider appropriate exceptions or grace periods for situations involving illiquid securities, or circumstances outside a participants control.

We appreciate CIRO's continue efforts to modernize the regulatory framework and welcome further dialogue on this initiative.

Respectfully,

Jennifer Ocampo-King
Managing Director
Equity Finance

cc:

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