Head Office/Siege Social
6985 Financial Drive, Suite 400
Mississauga, ON L5N 0G3

Mailing Address/Addressed Postage
P.O Box 174/C.P. 174
Streetsville, ON L5M 2B8

July 15th, 2026

Member Regulation Policy
Canadian Investment Regulatory Organization
Suite 2600
40 Temperance Street
Toronto, Ontario M5H 0B4
e-mail: memberpolicymailbox@iiroc.ca

***RE:* Rule Amendments – Proposal to Harmonize CIRO Continuing Education Programs (Phase 2)**

PFSL Investments Canada Ltd. (“PFSL”, “we” or “our”) is pleased to respond to the Canadian Investment Regulatory Organization’s (“CIRO”) consultation regarding the proposal to harmonize continuing education (“CE”) programs under the Investment Dealer Partial Consolidated (IDPC) rules and the Mutual Fund Dealer (MFD) rules. Our comments can be found below.

Overview

PFSL supports the overall objective of harmonizing the CE requirements applicable to Investment Dealers and Mutual Fund Dealers. We believe many of the Phase 2 proposals advance CIRO's goal of creating a more consistent, efficient, and scalable framework while reducing unnecessary regulatory burden for firms and Approved Persons. In particular, we support proposals that simplify CE requirements, improve flexibility, establish greater consistency across dealer categories, and preserve essential business models.

As CIRO finalizes the harmonized framework, we encourage continued focus on balancing investor protection objectives with operational realities faced by firms. Harmonization should preserve systems and processes that are functioning effectively today and provide firms with sufficient certainty, guidance, and implementation time when significant changes are contemplated.

About Primerica

Primerica Financial Services (Canada) Ltd. (“Primerica”) is a leading distributor of basic financial savings and protection products to middle-income households across Canada and has served the Canadian public since 1986. Our Canadian corporate group includes PFSL Investments Canada Ltd. (“PFSL”), our mutual fund dealer, and Primerica Life Insurance Company of Canada (“PLICC”). PLICC is represented by more than 11,000 licensed life insurance agents across the country, and approximately 60% of our life insurance agents are dually registered as mutual fund representatives. PFSL maintains a large national network of mutual fund registered representatives and serves a client base with modest account balances and emerging savings needs. Its business model is therefore materially different from traditional wealth management models that concentrate on larger accounts and affluent households.

PFSL serves a segment of the Canadian market that is often overlooked by traditional wealth management models. Through a national network of mutual fund registered representatives, PFSL provides financial education, personal guidance, and investment solutions to middle-income Canadians, many of whom are first-time investors or households with modest account balances. Clients can begin investing with as little as $25 per month, allowing families to establish savings habits and participate in long-term wealth accumulation.

We are proud of our high customer satisfaction and retention, our collaborative approach to regulation, and our commitment to strong consumer protection. Primerica's people-first philosophy and commitment to doing what is right for clients is reflected in the millions of families across North America who trust Primerica with their financial needs.

Comments

CE Technology Systems

PFSL reaffirms our comments made in our response to the Phase 1 consultation regarding CE reporting systems. We continue to strongly support the retention and ongoing use of the Continuing Education Reporting and Tracking System ("CERTS").

Our organization, along with many other Mutual Fund Dealers, has invested significant time, resources, and operational effort into implementing and integrating the CERTS platform. After the initial implementation period, the system has matured considerably and now provides an effective and efficient mechanism for tracking, recording, and reporting CE completion. In our view, maintaining a common industry-wide platform creates substantial benefits for both firms and Approved Persons. A centralized system promotes consistency, facilitates representative mobility, reduces duplicative recordkeeping requirements, and minimizes the need for firms to develop and maintain separate proprietary CE tracking solutions. The alternative would likely require many firms to build or acquire their own systems, resulting in increased industry costs and fragmented reporting practices.

Should CIRO determine that CERTS will ultimately be replaced or retired, we strongly recommend providing a minimum implementation period of 24 months. Such a transition would represent a significant system and operational change for firms and would require substantial planning, development, testing, training, and resource allocation.

Section 3.2.1 – Compliance-Related CE Credit Requirements

PFSL supports the proposal to merge the current MFD Business Conduct and Compliance credit requirements into a single compliance requirement in alignment with the IDPC framework.

We believe this change simplifies the framework while maintaining the underlying objective of ensuring Approved Persons remain current on regulatory, ethical, and compliance matters. Ethics-related training is naturally incorporated within broader compliance programming, and we do not believe there is regulatory value in maintaining separate categories or caps for ethics-related content. Accordingly, we support removing the distinction between ethics and non-ethics compliance content and replacing it with a single, broader compliance category.

Section 3.2.2 – CIRO-Developed CE Training

PFSL supports CIRO's objective of ensuring Approved Persons complete training on regulatory matters that CIRO considers to be of significant industry importance. However, we note that many firms develop annual CE plans and engage third-party providers well in advance of the applicable cycle. For many firms, CE programming is developed through external providers and packaged into broader annual training plans. To facilitate effective planning and implementation, we recommend that CIRO provide at least 12 months' notice regarding any mandatory CIRO-developed CE training content. Early notice would allow firms to appropriately incorporate CIRO-mandated material into their annual CE programs and avoid unnecessary disruption to existing training arrangements.

Section 3.2.3 – Topics Lists

PFSL appreciates CIRO's objective of moving toward a principles-based framework for CE course approval. However, we believe a fully principles-based approach may create uncertainty for firms and Approved Persons. Prescribed topic areas and approved courses provide valuable guidance and certainty regarding what qualifies for CE credit. Eliminating these mechanisms entirely may result in inconsistent interpretations across firms and increase the regulatory burden on dealers, who would become responsible for making their own determinations regarding course suitability.

While we support greater flexibility, we believe there remains value in maintaining some form of CIRO review or approval process. For example, CIRO could offer a voluntary fee-based review service through which course providers may seek confirmation that a course meets CE requirements. Such an approach would preserve flexibility while providing additional confidence and consistency for dealers, representatives, and course providers.

Should CIRO choose to proceed with the proposed principles-based approach, we would further encourage simplification through the use of broader categories such as Compliance Hours and Professional Development Hours, rather than maintaining multiple sub-categories that may create confusion or inconsistent interpretation.

Section 3.2.5 – Completing CE While Ceasing Approved or Registrable Activities

PFSL supports permitting CE activities completed while an individual is transitioning between registrations, dealers, or approval categories to count toward the applicable CE requirements. Consistent with this rationale, we encourage CIRO to consider permitting compliance-related courses to be completed regardless of an individual's current registration status. Compliance training remains valuable regardless of the representative’s registration status at the time the training is completed. From an operational perspective, allowing individuals who have previously held registration to complete compliance training would provide greater flexibility and support smoother transitions between firms and registration categories.

Section 3.3.3.3 – Compliance Hours

PFSL supports the proposed harmonization of terminology through the adoption of a unified "Compliance Hours" category. This proposal aligns well with the broader objective of simplifying CE requirements. Consistent with our comments regarding Section 3.2.1, we believe all qualifying compliance content should be included within a single compliance category without separate ethics sub-categories or caps.

Section 3.5.1 – Cycles

PFSL recognizes the benefits associated with a harmonized CE cycle and appreciates CIRO's efforts to create a consistent national framework. Nevertheless, we continue to have concerns regarding the proposal to move the MFD CE cycle to a calendar-year basis ending on December 31.

The current December 1 to November 30 cycle provides an important operational buffer between CE completion and annual registration renewal activities. That one-month separation allows firms to assess whether representatives have satisfied CE obligations before making year-end registration renewal decisions. If CE and registration renewal obligations are effectively consolidated around the same year-end period, firms may face situations where registrations are renewed before CE deficiencies have been identified and addressed. Additionally, December is already one of the busiest periods of the year for both firms and representatives. The month includes holiday schedules, vacation periods, year-end reporting obligations, and numerous business activities. In practical terms, the effective working days available during December are significantly reduced.

CIRO specifically requested feedback regarding additional regulatory burdens associated with a calendar-year cycle. From our perspective, the loss of the existing one-month compliance buffer, combined with the concentration of regulatory obligations during December, represents a meaningful operational concern that should be carefully considered before changes are implemented. Finally, PFSL continues to support maintaining the current two-year CE cycle. We do not believe an annual cycle would provide sufficient additional regulatory benefit to justify the increased administrative burden that firms and representatives would incur. Consistent with our Phase 1 submission, we believe the current two-year approach remains appropriate and proportionate.

Section 3.5.2 – Post-Cycle Reporting

PFSL supports extending the reporting deadline from 10 business days to 30 days following the end of a CE cycle. This change provides firms with reasonable additional time to complete required administrative reporting and represents a practical improvement to the current framework.

Section 3.6 – Automatic Suspension and Reinstatement

PFSL supports the proposal to harmonize automatic suspension provisions across dealer categories. Providing a consistent framework for addressing CE non-compliance across all CIRO dealers promotes regulatory certainty and should assist firms in understanding and managing non-compliance situations.

Section 3.7 – Proration, Leave of Absence and Exemptions

PFSL supports the proposals relating to proration and leave of absence provisions. We supported the introduction of proration in our response to the Phase 1 consultation and continue to believe it is an effective tool for reducing unnecessary regulatory burden while maintaining appropriate CE standards. Similarly, the proposed treatment of leaves of absence is proportionate and will benefit both firms and representatives.

Section 3.8.4 – Express Prohibition on Carry Forwards

PFSL supports the proposed clarification prohibiting carry-forwards of CE activities between cycles. This proposal is consistent with previous harmonization efforts and contributes to a simpler and more understandable CE framework.

Conclusion

PFSL appreciates the opportunity to provide comments on CIRO's Phase 2 CE harmonization proposals. Overall, we support many of the proposed changes and commend CIRO's efforts to create a more consistent and streamlined CE framework across dealer categories.

As CIRO moves toward implementation, we encourage continued focus on operational practicality, preservation of effective industry infrastructure such as CERTS, appropriate implementation timelines for significant systems changes, and regulatory guidance that provides firms with sufficient certainty to administer their CE programs efficiently and effectively.

We would be pleased to discuss any of these comments further.

Sincerely,

[*Original Signed By*]

Rosie Orlando
EVP and President of Primerica Life Insurance Company of Canada