

October 21, 2026

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Re: Modernization of requirements for account transfers and bulk account movements

We are pleased to provide comments on behalf of IG Wealth Management Inc. ("IG") in response to the Canadian Investment Regulatory Organization's ("CIRO") request for comments on CIRO Bulletin 26-0161, Modernization of requirements for account transfers and bulk account movements (the "Proposed Transfer Rules").

Our Company

IG Wealth Management is a diversified financial services company and one of Canada's largest managers and distributors of mutual funds, including the exclusive distributor of its own products. We carry out our distribution activities through our subsidiary; IG Wealth Management Inc. ("IG") is a Dual Registered Firm and operates as an investment dealer with a dedicated mutual fund division. We are committed to comprehensive personal financial planning delivered through long-term client and advisor relationships. The company provides advice and services through a network of advisors located across Canada to over one million clients. We currently have approximately 3,300 advisors registered with CIRO, located across 52 regional offices spanning all provinces throughout Canada. IG has over \$176.6 billion in assets under advisement as of June 30, 2026. We are part of IGM Financial Inc., which is a member of the Power Corporation of Canada group of companies.

Overview

IG continues to support CRO's objective of improving the timeliness and efficiency of account transfers and providing clients with greater transparency and certainty throughout the transfer process. As noted in our October 2025 submission, account transfers involve multiple parties, products, systems and processes, and improving the client experience requires both an appropriate regulatory framework and continued modernization of the technology supporting transfers.

We appreciate that CRO has considered industry feedback received during the initial consultation and has made a number of meaningful changes to the Proposed Transfer Rules.

In particular, IG supports CRO's decision to unbundle the timelines applicable to different stages of the transfer process. The revised approach better recognizes that certain stages require client input and that the amount of time required to obtain that input may be outside the control of either Dealer. This responds to an important concern raised in IG's 2025 submission, where we noted that a client may require additional time to obtain legal or tax advice or otherwise determine how to address an impediment.

Notwithstanding these improvements, IG believes that additional clarification and flexibility are required in several areas to ensure the Proposed Transfer Rules achieve their intended objective without inadvertently creating delays or unnecessary operational complexity.

General Comments

Transfer Impediments

IG continues to support providing clients with timely information concerning genuine impediments to an account transfer. However, we continue to believe that additional guidance regarding what constitutes an "impediment" would benefit both Dealers and clients.

Our 2025 submission expressed concern that an overly broad interpretation could result in ordinary processing issues being characterized as impediments, notwithstanding that the position can ultimately be transferred. We appreciate CRO's decision not to prescribe an exhaustive list, since account transfers involve many different products and circumstances. However, without additional principles or examples, Dealers may reach different conclusions regarding substantially similar circumstances. That inconsistency could itself result in delays and a different client experience depending on the institutions involved.

We recommend that CRO provide principles-based guidance accompanied by non-exhaustive examples distinguishing: (i) circumstances that prevent a transfer from proceeding and constitute an impediment; (ii) circumstances that merely delay completion of a transferable position; and (iii) circumstances outside a Dealer's control, such as actions required by issuers, product manufacturers or clients.

Proposed Rule 4852

We appreciate that CRO responded to IG's comments about the need to expressly recognizing that a Dealer should not be required to transfer an account where a temporary hold has been placed on the account in accordance with applicable CRO requirements connected to vulnerable clients.

We recommend that CRO consider whether the rule should expressly accommodate other legitimate legal, regulatory or fraud-related restrictions that prevent a Dealer from transferring an account. For example, a Dealer may be required or reasonably determine that it should not process a transfer because of: (i) a court

order or other legal hold; (ii) an insolvency or bankruptcy proceeding; (iii) a matrimonial or estate dispute affecting ownership or authority over the assets; or (iv) circumstances giving rise to reasonable concerns about fraud, including potential fraud associated with the transfer request itself.

The rules should not place a Dealer in a position where compliance with a prescribed transfer timeline conflicts with its legal obligations or reasonable measures taken to protect the client or assets.

We therefore recommend that Rule 4852 be revised to permit a Dealer to delay or decline a transfer where the Dealer is required by law or reasonably determines that a hold is necessary to comply with Applicable Law or protect the client or account from suspected fraud or unauthorized activity.

Proposed Rule 4855

IG supports establishing clear expectations regarding how quickly a Receiving Dealer must communicate a client's authorized transfer request to the Delivering Dealer. However, we recommend reconsidering the proposed requirement that this occur within one clearing day.

The Receiving Dealer is incentivized to process the transfer request as expeditiously as possible, however, in an advised business model, a transfer request may initially arise during a client interaction with an advisor and subsequently need to be transmitted to a centralized operations function for validation and processing. Depending on the time at which the client authorization is received and the Dealer's operating model, requiring completion of all of these steps within one clearing day may be difficult without a highly automated end-to-end process.

This requirement is particularly notable given that account-transfer processes continue to rely heavily on manual processes and fragmented systems and that technology solutions are necessary to achieve the broader modernization objective. While we understand the intent is to move to a more automated system, these rules may become effective prior to the development of said technologies.

We recommend that CRO consider either: (i) requiring the Receiving Dealer to send the request promptly, consistent with the principles applied elsewhere in the Proposed Transfer Rules; or (ii) extending the prescribed period to two clearing days. Either approach would continue to establish a meaningful service standard while better accommodating current operational realities until greater automation becomes available.

Technology and Ability to Demonstrate Compliance

IG continues to believe that technology modernization and regulatory modernization must proceed together. The revised proposal creates several discrete regulatory timestamps, including one clearing day, two clearing days, "promptly," and five clearing days following the determination that no impediments remain. While these separate timelines better reflect the actual transfer process, they also create a need for Dealers to reliably establish when each regulatory clock starts and stops.

We encourage CRO to continue working with account-transfer facilities and industry participants to ensure that technology solutions provide standardized electronic timestamps and audit trails that allow Dealers to demonstrate compliance with each stage of the process. However, we continue to believe that enforcement of these rules should be based on systemic issues, as opposed to one-off instances where there is a non-material delay (i.e. 11 days instead of the 10 days). Clients will continue to have normal course compliant mechanisms to address one-off instances where there may be a delay.

Implementation Period

IG recommends that CIRO provide Dealers with a minimum 18-month implementation period following publication of the final rules.

This is consistent with IG's 2025 submission. At that time, we explained that implementation would require more than simply updating transfer timelines. Dealers may need to develop or modify forms, supervision procedures, policies, client materials, advisor education and supporting technology.

The Proposed Transfer Rules create additional operational requirements that reinforce the need for an appropriate transition period, including the need to: (i) build workflows around multiple new regulatory timestamps; (ii) create evidence and audit trails demonstrating compliance with each stage; (iii) modify communications between advisors and centralized operations; (iv) update electronic transfer processes and interfaces with recognized account transfer facilities; and (v) train advisors and operations personnel on the revised impediment and client-communication requirements.

Conclusion

IG appreciates the alterations CIRO has made in response to the first consultation to address stakeholder feedback. In particular, unbundling the transfer timelines and recognizing temporary holds represent meaningful improvements that better account for the practical realities of the account-transfer process.

IG continues to support CIRO's objective of improving the client transfer experience. We believe further clarification regarding the scope of the rules, impediments, legitimate account holds, transfer-request timelines and fee recovery, together with an appropriate implementation period, will help ensure that the final requirements establish clear and achievable standards while recognizing circumstances outside a Dealer's control.

We encourage CIRO to continue collaborating with Dealers, the CSA, product manufacturers, transfer facilities and other financial institutions as both the regulatory and technology components of the account-transfer modernization initiative progress.

Thank you for the opportunity to provide comments on the Proposed Transfer Rules. We would be pleased to engage further with CIRO on this important initiative. Please feel free to contact Adrian Walrath at Adrian.walrath@ig.ca or me if you wish to discuss our feedback further or require additional information.

Yours truly,

IG Wealth Management



Danielle Tetrault

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