

CANADA'S BEST PRACTICE SOLUTION

MODULES FOR INVESTMENT FUND DEALERS

Registration Requirements

• Compliance with NI 31-103

AML/ATF

 Proceeds of Crime (Money Laundering) and Terrorist Financing Act, Regulations, Criminal Code, FINTRAC Guidelines

MFDA

 Mutual Fund Dealers Association Rules

Human Resources

- Provincial and territorial Employment Standards Act
- Accessibility for the Disabled (Ontario and Manitoba)

Privacy

- Federal PIPEDA
- Related provincial acts
- Privacy Commissioner decisions

CASL

Canada's Anti-spam legislation

Survey of Laws

Compendium of laws with potential applicability to an FRFI

FATCA-IGA/CRS

 Canada/ US Inter-Governmental Agreement and International Common Reporting Standards

IMPLEMENTING INTERNAL COMPLIANCE CONTROLS:

46 A registered firm must establish, maintain and apply policies and procedures that establish a system of controls and supervision sufficient to:

- provide reasonable assurance that the firm and each individual acting on its behalf complies with securities legislation, and
- manage the risks associated with its business in accordance with prudent business practices ??

- NI 31-103, Part II, s. 11.1

Entities can't assume the absence of problems means that controls and oversight are strong. Ethidex allows you to manage your company's controls, procedures and policies to ensure and demonstrate effective risk management and compliance to the board and other stakeholders.

- THE ETHIDEX ADVANTAGE -

→ Custom Regulatory Content

An Ethidex module is a set of digital documents that organizes your regulatory requirements in a framework tailored to your business structure. Canadian requirements are presented as plain language control objectives backed up by specific citations and links to full-text sources. Modules are updated quarterly to meet changing requirements with the assistance of Borden Ladner Gervais LLP.

→ Save Time and Save Money

Compliance Office™ helps make the Ethidex Service the easiest and most cost-effective way to satisfy the risk management and compliance expectations of your Directors, Auditors, Regulators and other Stakeholders. Compliance Office™ is Web based and securely hosted at a Canadian top-tier data centre.

→ Our Service Commitment

is to ensure that our clients are active, satisfied Ethidex users. To this end, we undertake to provide at no additional cost, whatever ongoing support and training clients may require in order to get the maximum value from our offering.

→ Years of Experience

Since 2004 Ethidex has been developing and continuously enhancing Compliance Office $^{\text{TM}}$ to suit the needs of more than 100 clients to effectively manage business and compliance risks in accord with the prudent standards of Canadian regulators.



ETHIDEX: YOUR BEST PRACTICE SOLUTION

Our methodology allows financial institutions to focus on managing their business rather than managing legislative changes.

CHECKLISTS ARE NOT ENOUGH

A best practice solution reduces risk and builds regulatory confidence.

Are requirements and risks evaluated in the context of the business processes that are affected?

: We clarify the relevant risks and requirements in plain, industry-specific language and organize them by business process.

Are appropriate auditable controls built into business processes to ensure on-going compliance and risk mitigation?

: We provide an efficient framework for controls documentation, assessment and reporting.

Are managers and other responsible individuals:

- Aware of the risks and requirements?
- Accountable for control implementation and documentation?
- Self-assessing control effectiveness?
- · Updating controls for a changing environment?
- : The system provides an auditable workflow to manage accountability. documentation, assessment and reporting.
- : We alert you to relevant changes that apply to your business and advise you on where they impact your business processes.
- : We train and support your staff in using the Ethidex system on an on-going basis.
- Learn more about The Ethidex service at: ethidex.com

A RELIABLE BASIS FOR ATTESTATION AND ASSURANCE

The dynamic documentation of requirements, risks, controls and policies within Ethidex establishes an effective foundation for attestation and reporting. At each point from management to the Board and then to the regulator, a wellmaintained Ethidex database provides the basis for a reliable assertion of current and ongoing compliance.

Using the tools integrated in our system, Audit can efficiently carry out verification and testing of management's controls documentation in order to provide assurance of accuracy and completeness to all stakeholders.

Documentation in Ethidex	Attestation	
 Requirements Risks Policies Accountabilities Audit trail 	Management Board	Regulator
Verification • Testing • Analysis	Audit Assurance	

ABOUT ETHIDEX-

Ethidex Inc. is a leading software solution in the areas of Governance, Risk and

Ethidex Inc. was formed in 2004 as an independent company to acquire the successful Ethidex Risk Manager Service business that had been built by the three founding principals at PwC beginning in 1999.

Ethidex acquired the Compliance Office™ software and continues to serve an established client base with the assistance of the three law firms that helped develop the service from the outset: McMillan LLP, Fasken Martineau LLP, and BLG LLP.

- ABOUT BORDEN LADNER GERVAIS LLP-

Borden Ladner Gervais LLP (BLG) is a leading, national, full-service Canadian law firm focusing on business law, commercial litigation and arbitration, and intellectual property solutions. BLG is one of the country's largest law firms with more than 725 lawyers, intellectual property agents and other professionals in five cities across Canada assisting clients with their financing to trademark and patent registration. The firm's Investment Management Group is one of the largest practices of its kind in Canada. The group is widely recognised as an industry leader for its innovative practice solutions. Clients include fund managers, hedge fund domestic and international.

- 44 We are proud of our longstanding relationship with Ethidex and mutual commitment to providing practical and effective compliance tools to fund managers and other securities registrants that can be used in their day-to-day business. 77
 - Partner and National Leader,

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