

National Instrument 24-101 Policies & Procedures Checklist

Y/N	Category	Content
POLICY		
	Purpose & Objective of Policy	<ul style="list-style-type: none"> Referencing NI 24-101 rule objectives
	NI 24-101 Timelines	<ul style="list-style-type: none"> Identify the applicable target that needs to be met as defined by the rule (Policy can be updated each year to reflect current target)
	Trade Matching Statements	<ul style="list-style-type: none"> Reference the CCMA statement example and the objective of the statement based on the rule Include requirement for periodic review for updated broker statements on websites
	Internal Trading Processes	<ul style="list-style-type: none"> Reference internal processes within organization that can include when trades should be entered into an Order Management System (OMS) (i.e., trade date) and sent to accounting Include scheduled time(s) when trades are transmitted to Custodian throughout the day
	Reporting & Monitoring	<ul style="list-style-type: none"> Include internal reporting metrics approach Include custodian monthly reporting statistics Include any broker reporting statistics analysis Identify who will prepare, monitor and review the statistics within the organization
	Exception Reporting	<ul style="list-style-type: none"> Define how exceptions will be identified, reported and acted upon Include any internal committees that review this reporting
	Policy Review	<ul style="list-style-type: none"> Indicate when policy will be reviewed and updated
PROCEDURES		
	Trade Matching Statements	<ul style="list-style-type: none"> When new brokers are added to approved lists, have a process for ensuring statements exist on both sides
	Order Entry & Confirmation – within individual desk procedures	<ul style="list-style-type: none"> Describe Front office traders functions and timelines Describe Back office support functions and timelines
	Reporting & Monitoring (Daily & Monthly)	<ul style="list-style-type: none"> Detail Operations staff functions and timelines in reviewing adherence to targets
	Dealing with Exceptions (Daily & Monthly)	<ul style="list-style-type: none"> Detail Operations staff's roles in dealing with daily exceptions in order to minimize for the month
	Review & Analysis of Reporting Metrics	<ul style="list-style-type: none"> Have a process to review internal and custodian reporting for assessing and following up on any recurring issues