



CIRCULAR 050-25

May 7, 2025

**REGULATORY DIVISION - REPORTS OF ACCUMULATED POSITIONS
GUIDELINES & FAQ UPDATE**

On March 10, 2025, the Regulatory Division of Bourse de Montréal Inc. (the “Division”) published [Circular 032-25](#) announcing the release of a new application on the [Participant Portal](#) to submit reports of accumulated positions (the “New LOPR App”).

The website of the Division and previously published documents have been updated to reflect these changes. The updated version of the following documents are annexed and can be found on the Division’s website [here](#).

- Guidelines on Reports of Accumulated Positions (See Appendix A)
- FAQ on Reports of Accumulated Positions (See Appendix B)

Reminder: The New LOPR App replaced the LOPR Notification Portal, which has been decommissioned as of May 7, 2025. To gain access to the New LOPR App, please contact your firm’s administrators of the Participant Portal. For any questions on accessing and navigating the Participant Portal, please contact mxr-connect@tmx.com.

For more information or for any questions, please contact the Division:

- info.mxr@tmx.com
- 514-787-6530
- Toll-free from Canada and US: 1-800-361-5353 extension 46530
- Toll-free from the UK and France: 00 800 36 15 35 35 extension 46530

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Regulatory Division of Bourse de Montréal Inc.

Guidelines

Subject: Reports of Accumulated Positions

Rule Article: 6.500

Effective Date: March 5, 2020

Last Update: May 7, 2025

These guidelines are published by the Regulatory Division (the “Division”) of Bourse de Montréal Inc. (the “Bourse”) to complement the regulatory requirements described in the Rules of the Bourse (the “Rules”) by providing Approved Participants and Foreign Approved Participants (collectively, the “Participants”) additional information and clarification, and setting out the expectations of the Division. Capitalized terms throughout these guidelines have the meanings specified in these guidelines or the Rules. In the event of a conflict between the Rules and these guidelines, the Rules shall prevail.

The Division, has an automated and secure Listed Product¹ position reporting tool for Reports of Accumulated Positions, commonly known as Large Open Position Reporting (“LOPR”). This reporting tool aims to ensure confidentiality and security to the reporting process for large open positions in Listed Products.

[Article 6.500](#) of the Rules of the Bourse (the “Rules”) pertaining to Reports of Accumulated Positions describes the obligations of Approved Participants and Foreign Approved Participants (collectively, “Participants”) for reporting large open positions in Listed Products.

The LOPR reporting tool enables Participants of the Bourse to electronically submit, on a daily basis, their clients’ and proprietary accounts’ reportable open positions and account beneficial owner profiles directly to the Division (the “LOPR Tool”).

This guide describes the various regulatory requirements that Participants must comply with in order to satisfy the reporting requirements of the Bourse through the LOPR Tool.

¹ Pursuant to the Rules of the Bourse, a Listed Product means any Derivative Instrument listed for trading on the Bourse

1. LOPR ACCESS

The following provide Participants with options for submitting position data to the Division:

- The LOPR Tool for submitting data on a daily basis:
 - The Graphical User Interface (the “GUI”) client application;
 - Direct communication using the SOLA Access Information Language (“SAIL”) protocol;
- The LOPR application (the “LOPR App”) on the Participant Portal can be used when experiencing technical difficulties with the LOPR Tool.

1.1 THE GUI CLIENT APPLICATION

Participants who choose to submit their reportable open positions and account profiles using the GUI client application are able to enter the data manually into the GUI and send it to the Bourse or, alternatively, export the data from their systems into an integrated delimited text file and send it to the Division via the GUI.

1.2 DIRECT COMMUNICATIONS USING THE SAIL PROTOCOL

Participants who are familiar with the SAIL protocol or those who wish to implement a messaging solution to submit their large open positions and account profiles are able to communicate their position data to the Division by SAIL messaging through one of the existing Bourse’s [Points of Presence](#).

1.3 THE LOPR APP (amended on December 14, 2025; May 7, 2025)

The LOPR App is strictly reserved for situations where technical issues prevent the accurate and timely submission of LOPR reports with the usual LOPR Tool. In such circumstances, the LOPR App provides a user-friendly and secure alternative for LOPR report submission.

The LOPR App does not in any way replace the prescribed manner in which LOPR reports must be submitted to the Bourse on a daily basis. It is to be used only to provide the LOPR report when technical issues prevent its transmission in the usual prescribed manner.

In order to facilitate access to LOPR and keep users aware of the technical and regulatory requirements associated with this tool, Participants and IT support staff can find relevant circulars, technical notices and technical documents on the [LOPR webpage](#). Participants are strongly advised to [subscribe](#) to the [Bourse’s circulars](#).

2. LOPR REPORTING RESPONSIBILITIES

2.1 POSITION SUBMISSION TIME (amended on September 20, 2021)

Participants are required to submit their reports on Listed Product positions on a daily basis. Even if, for a given date, a Participant does not hold any positions or if a Participant does not hold positions that exceed the reporting thresholds of the concerned Listed Products as prescribed by the Bourse, the Participant must submit a message confirming that there are no reportable positions for the date in question. The positions at the end of a given trading day or, as the case may be, any message confirming that there are no positions to report must be submitted to the Division no later than 9:00 a.m. eastern time (ET) the next business day.

Reports pertaining to the accumulation of positions for Listed Products are submitted within the prescribed reporting hours below:

- From Monday to Thursday: from 7:00 p.m. (t-1) to 5:40 p.m. ET
- Friday: from 7:00 p.m. (t-1) to 10:00 p.m. ET

Example: The position report for Tuesday, February 22, which must include all reportable open positions as of the close of the trading session for that day, may be submitted either before 5:40 p.m. ET on

February 22 or between 7:00 p.m. ET on February 22 and the reporting deadline, 9:00 a.m. ET on February 23.

It is important to note that the report date which appears by default on the GUI is that of the current day. Therefore, users must take particular care in order to ensure that this “report date” accurately reflects the end of the trading day’s date for which the position reports have been compiled.

2.2 FAILURE TO SUBMIT OR ERRONEOUS SUBMISSIONS PENALTIES (amended on December 14, 2022)

Failure by a Participant to submit position reports in a timely manner may lead to the imposition of [late filing fees](#). Additionally, erroneous submissions or the recurrence of late filings may result in disciplinary sanctions. It is therefore very important that Participants ensure that their position reports are submitted on time, complete and accurate.

2.3 LOPR SUPERVISION REQUIREMENTS (amended on December 14, 2022)

Pursuant to [Article 3.100](#) of the Rules, each Participant “must establish and maintain a system [...] that is reasonably designed to achieve compliance” with [Article 6.500](#) of the Rules and must ensure that the information contained in its LOPR reports is complete and accurate, which includes both position and account information being reported to the Bourse.

The supervision and compliance obligations are principles-based. No single approach applies to all Participants. It is up to Participants to design and implement a supervision system that is tailored to their business model, structure and risks. The Division acknowledges that it must be flexible and allow Participants the latitude to determine what is appropriate based on their needs, and adjust their systems accordingly.

The Division uses the following non-exhaustive list of questions to understand and determine whether a Participant’s supervision system is reasonable for LOPR reports. The Division believes that these questions may also provide the Bourse’s Participants with guidance on how to design their supervision system and determine its application for submitting accurate and complete LOPR reports:

1. Does the Participant’s supervision system address LOPR reports?
2. Do the Participant’s policies and procedures include reviews of compliance with the Rules of the Bourse regarding LOPR reporting requirements, including the accuracy and completeness of the information sent to the Division?
3. Are the policies and procedures documented in writing?
4. Does the Participant have policies and procedures detailing its internal controls of the effectiveness of its supervision system? Are these policies and procedures documented in writing?
5. Does the Participant have policies and procedures that require retaining the reports or documents related to its supervision activities?
6. How much time does the Participant need to identify a compliance problem, should one arise?
7. Does the Participant have an escalation process? What is it? Is it documented in writing?
8. If a compliance issue is identified in a LOPR report and the problem is escalated, does the Participant have a process for identifying the root cause?
9. Is the Participant’s escalation process documented and verifiable, and is the documentation retained?
10. What process applies if a systematic problem is identified in the Participant’s LOPR reports?

The LOPR report surveillance and compliance obligation applies to each Participant, whether it is its own back-office, or a third-party to which this function has been delegated (subparagraph [6.500\(l\)\(v\)](#) of the Rules).

2.4 LOPR EXEMPTIONS AND DELEGATIONS

According to the Rules, the responsibility of reporting open positions rests with each Participant. Positions must be reported on a fully disclosed basis. Exemptions may be granted under specific conditions. It is

also permitted, after approval from the Division, to delegate the reporting task to a third party such as, for example, a carrying or clearing broker or a service provider.

- A. A **LOPR exemption** may be granted if a Participant has not traded in the last calendar year and does not intend or plan to trade Listed Products in the near future.

Such an exemption relieves the inactive Participant from the obligation of submitting a “no reportable positions” report on a daily basis. The exemption request must be in writing and must confirm that the Participant has been inactive on the Bourse’s market during the last calendar year and that it does not have any intention of trading.

Exemption requests must be sent to info.mxr@tmx.com to be processed by the Division.

- B. Should a Participant wish to **delegate the LOPR requirement** to a third party (e.g., carrying or clearing broker, another Participant, or independent software vendor), a formal request must be submitted to the Division. The delegation request must be submitted to the Division in writing and must confirm that reportable accounts will be **fully disclosed** (no undisclosed customer omnibus accounts in the name of the Participant will be accepted). The third party being delegated the task must be identified and a written confirmation from that party agreeing to the undertaking on behalf of the applicant must be submitted. Such a delegation may be granted only if the delegated party is able to report accounts on a fully disclosed basis. Delegation requests must be sent to info.mxr@tmx.com and will be processed by the Division.

The third party delegate needs to establish connectivity on behalf of the Participant. Upon connection, the delegate must request a UserID and password that belong to the delegating Participant. Any positions reported by the delegate on behalf of the delegating Participant shall be reported using that UserID and password. Note: UserIDs and passwords will not be provided to Participants that are delegating the task to a third party but to the delegate. Also, Participants who delegate reporting will not have access to the LOPR production environment, however they may request view-only access for the purpose of supervision. The LOPR supervision functionality is detailed in the following section.

A delegate who reports on behalf of one or more Participants shall do so on a per Participant basis. A third party delegate must therefore obtain separate and different UserIDs and passwords for each Participant on whose behalf it reports positions. Additionally, as per subparagraph [6.500\(l\)\(v\)](#), the delegation of the LOPR reporting task does not relieve the Participant from its responsibility to ensure that position reports filed on its behalf are filed in a timely manner and that they are accurate and complete. Participants who choose to delegate should therefore put in place a process and procedures to ensure that they receive copies of the reports that are filed on their behalf and to ensure that the information contained in these reports is complete and accurate.

All LOPR exemptions and delegations discussed in sections A and B remain valid as long as all the conditions are complied with that relate to such exemptions or permissions.

- C. LOPR Supervision related to third-party delegations and Supervision IDs:

As per section [2.3](#), this obligation applies to each Participant, whether its own back-office, or a third-party to which this function has been delegated, submits the daily LOPR information to the Bourse (subparagraph [6.500\(l\)\(v\)](#) of the Rules). In the case of LOPR delegations, the supervision of LOPR remains the Participant’s responsibility and should consist of a review of the LOPR data submitted on the Participant’s behalf to ensure completeness and accuracy.

The Participant may contact the [Derivatives Technical Operations](#) to request a Supervision ID which will permit them to have view-only access to the LOPR information being submitted by their delegate. Participants who have delegated their daily LOPR duties to a third-party are encouraged to use the “Supervisors” feature² to assess whether it could be helpful in performing

² The “Supervisors” feature was introduced as part of broader enhancements ([Circular 17-007](#)). The feature helps Participants monitor the account and position information submitted.

their LOPR supervision, or whether another in-house solution may be more suitable for their business structure.

3. ACCOUNT OWNER IDENTIFICATION REQUIREMENTS

The following section addresses the regulatory requirements associated with the identification of account owners and ownership aggregation.

3.1 ACCOUNT BENEFICIAL OWNER

For the purposes of LOPR, the account beneficial ownership must be determined by applying the following subsequent steps:

- A. Person or entity with more than 50% ownership interest in the account;
- B. Name of the account (e.g. Mr. and Mrs. Smith, ABC Investment club).

It is the Participants' responsibility to determine account ownership based on the information that has been or can be provided by the account owner(s).

Please note that the LOPR Account Owner "Name" field can accommodate up to 25 characters. If the full account beneficial owner name exceeds 25 characters, use abbreviations which best describe the entity.

Participants should not hesitate to communicate with the Division for more guidance.

3.2 ACCOUNT OWNER ID

The Account Owner ID field helps the Division to determine the account beneficial owner in order to aggregate positions through different account numbers across all Participants.

The following guidelines are to be used when populating the Account Owner ID field:

- A. For an account in the name of an individual or of a registered or corporate entity owned exclusively by this individual:
 1. Internal identifier used by the Participant to link accounts belonging to the same account beneficial owner within the firm;

If, and only if, the above identifier is unavailable, Participants will be allowed to use the following identifier:

2. Account owner's last name.

Participants can establish an identifier format that represents a practical and adequate solution. It is important that the identifier, used for each account beneficial owner, be unique so that different account beneficial owners do not have the same identifier.

Example 1

John Doe has the following accounts with a Participant:

John Doe Account Types	Account #	Internal unique identifier used by a Participant to link accounts belonging to the same individual
RRSP	123456	ABC123
CDN Margin	789101	ABC123
TFSA	121314	ABC123
JD Corp ³ (Personal Holding Corporation)	875149	ABC123

³ If the client has a beneficial ownership interest greater than 50% in the account, refer to section B.

Each Participant is responsible for providing this “unique internal identifier” that links accounts belonging to the same individual within the firm. This “unique internal identifier” must remain permanent for the lifetime of all of the related accounts.

- B. For an account belonging to multiple individuals (partnerships, joint accounts, investment clubs, registered entities other than corporations, etc.):
1. If one of the account owners holds an ownership interest of more than 50% in the account, then use the identifiers discussed in section A) above related to this account owner.
 2. For all other circumstances, populate the field with the account name (e.g. Mr. & Mrs. Smith, ABC Investment club etc.). Please note that the Account Owner ID field can accommodate up to 25 characters. Should the full account name exceed 25 characters, create an acronym from the entity’s legal name.
- C. For all other corporate structures the following is to be observed:
1. If the corporation is more than 50% owned by an individual, use the identifiers found in B) above related to this account owner;
 2. If the corporation is more than 50% owned by another corporation, use the following criteria to determine the Account Owner ID:
 - i. The legal entity identifier (the “LEI”) belonging to the controlling corporation. The LEI can be obtained or created by accessing the following web portal at <http://www.gleif.org>; or
 - ii. The incorporation number of the controlling corporation.
 3. For other cases, use the following steps to determine the Account Owner ID:
 - i. The LEI for the corporation in whose name the account is opened. The LEI can be obtained or created by accessing the web portal at <http://www.gleif.org>;
 - ii. The incorporation number of the corporation in whose name the account is opened.
 4. If, and only if, the above identifiers are not available, Participants will be allowed to use one of the following identifiers:
 - i. Internal identifier used by the Participant to link accounts belonging to the same account beneficial owner within the firm; or
 - ii. Account owner corporate legal name (please note that the Account Owner ID field can accommodate up to 25 characters. If the full account owner’s corporate legal name exceeds 25 characters, create an acronym from the legal name.
- D. For any account not covered in sections A, B, or C:
1. Registration number (e.g.: charitable organization);
 2. Internal identifier used by the Participant to link accounts belonging to the same account beneficial owner within the firm;
 3. Account owner legal name. Please note that the Account Owner ID field can accommodate up to 25 characters. If the full account owner’s legal name exceeds 25 characters, create an acronym from the legal name.

4. FIELD REQUIREMENTS

4.1. ACCOUNT TYPES

As stipulated in the LOPR CSV Record Layout document, which is available upon request by contacting the [Derivatives Technical Operations](#), one of the following account types must be accurately provided when submitting an account record:

Account Type		Definition
1	Client	Refers to an account established by a Participant that is confined to securities or futures transactions executed by the Participant and positions carried by the Participant on behalf of its clients.

Account Type		Definition
2	Firm	Refers to an account established by a Participant that is confined to securities or futures transactions executed by the Participant and positions carried by the Participant on its own behalf.
3	Omnibus	Refers to an account held in the name of an entity or person that may be utilized for recording and clearing the trades of two or more undisclosed customers of the account holder.
4	Professional	Refers to an order for a security or a derivative instrument for an account that a director, officer, partner, employee or agent of a Participant or of a related firm of the Participant, or a person approved by the Bourse who has a direct or indirect interest, other than an interest in a commission charged. The Bourse may designate any order as being an order for the account of a professional if, in its opinion, circumstances justify it.
8	Market Maker	Refers to an account established by a Participant that is confined to exchange transactions executed by and positions carried by the Participant on behalf of a market maker.

4.2. ACCOUNT OWNER TYPES

As stipulated in the LOPR CSV Record Layout document, one of the following account owner types must be accurately provided when submitting an account record:

Account Owner Type		Definition
A	Canadian Bank	Schedule I Bank or Credit Union
B	Foreign Bank	Schedule II Bank or a bank based outside Canada
C	Canadian Broker	Broker based in Canada that is a member of IIROC
D	Foreign Broker	Foreign Broker
E	Fund Manager	Professional who manages various securities and assets to meet his or her clients' specified investment goals (e.g., commodity pool operator, options advisor)
F	Pension Fund	Plan or fund (including pension fund of government-owned corporation or State-owned enterprise), or program that provides retirement income to employees or that includes schemes that result in a deferral of income by employees
G	Government and State Owned Company	Government Ministry or a legal entity created by a government to undertake commercial activities for an owner government
H	Retail Client	Generally refers to individuals, families and small businesses
I	Insurance Company	Company that provides insurance coverage to a person or entity that buys an insurance policy
K	Hedge Fund	Investment fund open to a limited number of investors that takes on investments that carry a higher degree of risk than the risk assumed by traditional investment funds
L	Mutual Fund	Professionally managed investments that pool money from investors and invest in various investment securities
M	Commodity Trading Advisor	Asset manager or a firm investing in the futures market

Account Owner Type		Definition
N	Corporate	Entity that is engaged in a commercial activity (other than portfolio management and other than financial institutions, brokers, governments and government - owned corporations) that is granted a charter recognizing it as a separate legal entity which has its own rights, privileges, and liabilities and which are distinct from those of its shareholders
O	Proprietary Trading Firm (Primarily Algorithmic)	Trading firm or individual trading primarily for his or her own account using algorithmic trading tools
P	Proprietary Trading Firm Local	Trading firm or or individual trading primarily for his or her own account without using algorithmic trading tools or using them in a limited fashion
J	Miscellaneous ⁴	Refers to all other client types not mentioned above

4.3. COUNTRY CODES (added on June 28, 2021)

The [following document](#) defines the country codes to be used in the CSV that is required for the account record. If an LEI is provided for the Account Owner ID, Participants should ensure the account's country code corresponds with the LEI's entity legal address or headquarters address.

4.4 – STATES (added on June 28, 2021)

The state field is the subdivision to be used in the CSV that is required for the account record. The [ISO 3166-2 country subdivision code](#) is the recommended standard. If an LEI is provided for the account owner ID, Participants should ensure the account's country subdivision code corresponds with the LEI's entity legal address or headquarters address.

5. REPORTING REQUIREMENTS

5.1. POSITION CALCULATION – SINGLE ACCOUNT

To determine if an account holds a number of open positions in Listed Products that is equal to or greater than the prescribed reporting threshold, Participants must take into consideration the gross (rather than net) open positions held in each Listed Product by the account's beneficial owner.

This means that if an account beneficial owner simultaneously holds long and short positions in a particular Listed Product, these positions must not be netted together to determine if the reporting threshold has been reached or exceeded but rather be added together.

In addition, for the purpose of such a determination, all expiries of a given Listed Product must be combined. For options on futures contracts as well as other options, all options having a different strike price must also be combined. Further, if an account simultaneously holds positions in futures contracts and in options on the underlying futures contract, the open positions in the futures and options on futures contracts must be combined. Additionally, open positions in equity options and share futures must be combined by underlying interest.

If it appears, following such a determination, that the reporting threshold has been reached or exceeded, Participants must then transmit to the Division, in the manner prescribed by the Division, the detail of all gross open positions (i.e. the information provided must allow the Division to know about all long and short open positions for each expiry and, in the case of options on futures contracts and other options, for each strike price).

No netting of long (short) positions against short (long) positions must be made for the purposes of the report that must be transmitted to the Division.

⁴ The "Miscellaneous" AccountOwnerType should be used only in cases where none of the above-mentioned AccountOwnerTypes can be applied to the specified account.

Example 2

The following is an example of an account holder's combined gross open positions that should be declared to the Division:

Listed Product	Long	Short
BAXZ21	50 contracts	
BAXH22	50 contracts	100 contracts
OBXZ21P9950	100 contracts	
OBXM21C9975		100 contracts

The total gross open positions for BAX futures and options on BAX (OBX) for the account holder is 400 contracts.

Since the total gross open position exceeds the reporting level for BAX and OBX (300 contracts), all long and short positions held in this account for BAX and OBX must be reported to the Division.

Example 3

The following is an example of an account holder's combined gross open positions for equity options and share futures that must be reported to the Division:

Listed Product	Long	Short
FTDM21	450 contracts	
FTDU21	100 contracts	50 contracts
TD 220121C84.00		100 contracts
TD 220121P90.00	250 contracts	

The total gross open positions for TD options and TD futures for the account holder is 950 contracts.

Since the total gross open positions exceeds the reporting level for stock options and single stock futures (250 contracts), all long and short positions held in this account for TD Listed Products must be reported to the Division.

5.2 POSITION CALCULATION – MULTIPLE ACCOUNTS

If an account owner holds or controls more than one account as a beneficial owner, the determination of the reporting threshold must be made by taking into consideration all open positions held in all the accounts of the same beneficial owner. For example, a client is the beneficial owner of an account opened in their name and also has ownership interest exceeding 50% in other accounts opened with other individuals or moral persons, the determination of whether or not the reporting threshold has been reached or exceeded must be made by taking into consideration all gross open positions held by all of the related accounts as a whole.

If it appears that on a combined basis the total number of gross positions held by all of the related accounts equals or is greater than the reporting threshold, all positions held by each of the related accounts must be reported and this regardless of the fact that one or many of them hold an open position that is lesser than the reporting threshold.

5.3 PARTICIPANT ACCOUNTS (FIRM ACCOUNTS)

Participants holding open positions for their own account in any Listed Product must report these positions to the Division by applying the same principles as those explained above.

5.4 REPORTING THRESHOLDS (amended on December 17, 2021)

Participants may consult paragraph [6.500\(i\)](#) or the [position limit file](#) for the latest reporting thresholds.

5.5 POSITION AGGREGATION

In order to determine if the reporting threshold is attained, Participants must aggregate positions belonging to the same account beneficial owner as previously defined in sections [5.1](#) and [5.2](#) above.

The following guidelines are to be used when aggregating by account beneficial owner for LOPR:

- A. Aggregate positions for all accounts in the name of an individual and for all registered or corporate entities owned exclusively by that single individual;
- B. For accounts belonging to multiple individuals (partnerships, joint accounts, investment clubs, registered entities other than corporations, etc), aggregate positions to the account owner who holds an ownership interest of more than 50% in the account;
- C. For accounts belonging to a corporation, other than 100% owned by one individual, or any other entity, aggregation of positions shall be done by beneficial ownership of the account.

In all cases, aggregation of positions shall be done by the account beneficial owner as determined by the approved Participant and/or its clients and/or its account owners directly; this includes discretionary and managed trading accounts under the same beneficial account ownership.

Once it has been determined that the reporting threshold has been attained for an account beneficial owner after aggregating all positions held in his accounts, each of these accounts containing positions must be reported separately in LOPR.

Example 4

Same account owner (Mr. X) may have multiple accounts:

- RRSP: Long 50 BB 210618C13.00
- TFSA: Long 200 BB 210618P9.00
- Margin CDN: Long 50 BB 210917C20.00

Although the accounts taken individually do not meet the reporting threshold, once aggregated by account beneficial owner (Mr. X) the cumulative open position exceeds the reporting threshold (300 total open contracts on the same underlying). Therefore, each of the three accounts above must be reported in a separate manner.

5.6 POTENTIAL DOUBLE REPORTING

1. Participant of the Bourse having its positions cleared by another Participant of the Bourse who is a CDCC member:

This scenario involves a situation where a Participant executes transactions and subsequently has the trades cleared by another Participant that is a CDCC member. This particular setup, which involves a Participant (executing Participant) detaining an account with another Participant who is a CDCC member may cause the latter to report the executing Participant's positions with those of its other clients when completing its daily LOPR submission. The Bourse does not accept that undisclosed customer omnibus accounts be reported by Participants acting as clearing brokers when such accounts are maintained in the name of another Participant.⁵ However, these clearing Participants are still required to report positions held in undisclosed omnibus accounts that are maintained for entities that are not Participants of the Bourse.

The Bourse requires that all Participants clearing their transactions through a clearing broker report positions held for their clients or for their own account. Furthermore, delegation of the reporting task is not permitted if the delegatee is unable to report positions on a fully disclosed basis (i.e. being able to identify each and every client holding positions and reporting each of these clients individually when they hold positions in excess of the prescribed reporting thresholds).

⁵ See [Circular 020-11](#) and [Circular 074-11](#).

- a. **Executing Participants must consider:** Participants must ensure that their positions held with other Participants are not being double reported. For example, if a Participant records positions in their books while being held by another Participant in its capacity as a clearing broker or carrying broker, and the Participant reports the positions that are recorded in their books, they must make sure that the other Participant who acts as their clearing/carrying broker does not also report these same positions, otherwise this will result in the same positions being reported twice.
- b. **Clearing Participants must consider:** Participants that undertake to clear and carry positions for other Participants must ensure that if they are reporting the positions of other Participants, those Participants should not be reporting these same positions, otherwise this will result in the same positions being reported twice.

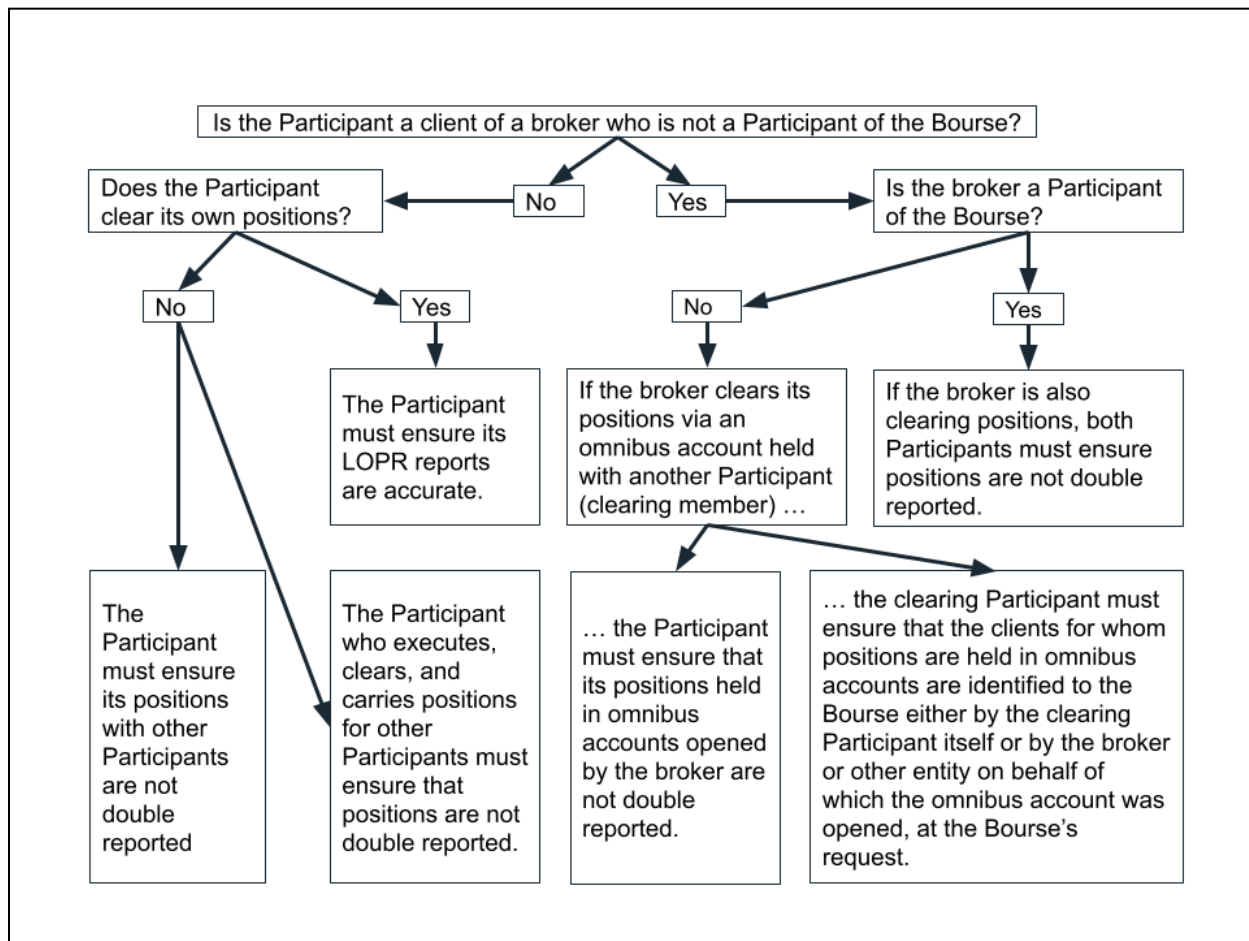
To determine if an entity is a Participant of the Bourse, please refer to the list of [Participants of the Bourse](#).

It is important that all Participants adopt effective communication and coordination procedures when they are using the services of another Participant to clear and/or carry positions on their behalf in order to ensure that there is no double reporting of a given position.

2. Participants of the Bourse routing orders through a broker who is not a Participant of the Bourse and clearing its transactions through another Participant of the Bourse who is a CDCC Member:

This scenario involves a situation where a Participant is a client of a broker who is not a Participant, whereby the latter is executing the Participant's transactions and clearing them through an omnibus account held with another Participant who is a CDCC member. In this situation, the first Participant runs the risk of having its positions reported twice as the clearing Participant does not have the details regarding the beneficial owners of the positions held in the broker's (who is not a Participant of the Bourse) undisclosed omnibus accounts. Therefore, the clearing Participant must ensure that the identity of the clients for whom positions are held in such omnibus accounts be provided to the Bourse either by the clearing Participant itself or by the broker or other entity on behalf of whom the omnibus account was opened, if the Bourse requests such information.

- a. **Participants must consider:** The Participant must ensure that their positions, which are held in omnibus accounts opened by non-Participants, are not being double reported.
- b. **Clearing Participants must consider:** Although clearing Participants are still required to report positions held in omnibus accounts that are maintained for entities that are not Participants of the Bourse, they must ensure that these omnibus accounts do not include positions of Participants.



It is imperative that Participants, other brokers that are not Participants of the Bourse, and Participants acting as clearing/carrying brokers communicate with one another in order to ensure that positions are not double reported and that they are reported in their entirety.

6. LOPR CONTACTS (amended on December 14, 2022)

For support, questions and issues of technical nature regarding the LOPR Tool, Participants may contact the [Derivatives Technical Operations](#).

For all other questions and issues, Participants may contact the Division:

- info.mxr@tmx.com
- 514-787-6530
- Toll-free from Canada and US at 1-800-361-5353 extension 46530
- Toll-free from the UK and France at 00 800 36 15 35 35 extension 46530



FAQ

Regulatory Division of Bourse de Montréal Inc.

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These frequently asked questions and answers (the “FAQ”) are published by the Regulatory Division (the “Division”) of Bourse de Montréal Inc. (the “Bourse”) to complement the regulatory requirements described in the Rules of the Bourse (the “Rules”) by providing Approved Participants and Foreign Approved Participants (collectively, the “Participants”) additional information and clarification, and setting out the expectations of the Division. Capitalized terms throughout the FAQ have the meanings specified in the FAQ or the Rules. In the event of a conflict between the Rules and the FAQ, the Rules shall prevail.

Q1: What are reports of accumulated positions?

A1: Reports of Accumulated Positions, commonly known as Large Open Position Reporting (“LOPR”), refer to the daily reporting of gross positions held. Pursuant to paragraph [6.500\(a\)](#), Participants must file daily with the Bourse, in the prescribed manner, a report detailing all gross positions held for its own account or for an account or group of accounts which are all owned by the same beneficial owner in Listed Products when these gross positions exceed the reporting thresholds prescribed by the Bourse for each of these Listed Products.

To ensure accuracy, confidentiality, and systematic transmission of the required information to the Division, Participants are required to use the graphical user interface (“GUI”) client application or use the application program interface (“API”).

Q2: Must all gross positions in Listed Products be reported?

A2: No. Only gross positions exceeding the prescribed thresholds as of the close of trading (4:30 p.m. ET) must be reported by 9 a.m. ET the following business day. Note that the report date must

correspond to the business day for which the positions have been compiled. For example, gross positions exceeding the reporting thresholds as of the close of trading on January 11, 2022 must be reported by 9 a.m. ET on January 12, 2022 and the report must be dated January 11, 2022. Reporting thresholds are established pursuant to paragraph [6.500\(i\)](#) and are retrievable from the [position limit file](#).

In the event no reporting threshold has been exceeded for any Listed Product, a report confirming that there are no positions to be reported must be filed, pursuant to paragraph [6.500\(a\)](#).

For further information, please refer to the [Guidelines: Reports of Accumulated Positions](#).

Q3: Are net positions permitted to be reported?

A3: No. In all instances, gross positions must be reported. Note that netting is only applicable for the purpose of position limits in certain circumstances. For further information, please refer to the [FAQ – Position Limits](#).

Q4: Are omnibus accounts permitted to be reported?

A4: A Participant may not report an omnibus account held by another Participant. However, a Participant may report an omnibus account held by the Participant itself, an affiliate of the Participant, or a sponsored access¹ client. In such cases, a Participant may report gross positions at the aggregate omnibus account level rather than each individual beneficial owner within the omnibus account.

Participants should note that omnibus accounts may be subject to additional information requests from the Division.

Q5: Who is responsible for providing information or responding to requests for information concerning omnibus accounts? (amended on May 7, 2025)

A5: Pursuant to paragraph [4.101\(b\)](#), Participants must provide without delay all information related to their business, trades, positions, or conduct as well as to the identity, business, trades or positions of any of their customers and employees and customers of persons for whom they provide account maintenance services.

However, pursuant to paragraph [4.100\(a\)](#), such information may also be obtained from the customers of the Participants. Therefore, to preserve confidentiality, Participants may instruct the omnibus account holders to submit the requested information directly to the Division.

Q6: I am a Participant attempting to submit reports but am experiencing technical difficulties. What should I do? (amended on December 14, 2022; May 7, 2025)

A6: A Participant experiencing technical difficulties with the GUI client application or API should contact the [Derivatives Technical Operations](#). In the event a Participant is unable to resolve technical difficulties prior to the prescribed deadline, the Participant must submit its reports on the LOPR application (“LOPR App”) available on the Participant Portal. Note that the LOPR App is not in any way a replacement of the prescribed manner in which LOPR must be submitted to the Bourse on a daily basis and should only be used when experiencing technical difficulties. If a

¹ Sponsored access pursuant to Article 3.5 of the Rules is referred to as “direct electronic access” pursuant to the Electronic Trading Rules. The terms are used interchangeably. Both relate to the access granted to a client when accessing the Bourse through the systems of a Participant.

Participant recurrently submits its reports on the LOPR App the Division may request more information that could lead to the opening of an investigation.

Q7: I am a Participant and have submitted incomplete or erroneous reports. What should I do? (amended on December 14, 2022)

A7: Participants are required to submit complete and accurate reports via the GUI client application or API. In the event a Participant submits incomplete or inaccurate reports, the Participant must submit corrections² via the GUI client application or API. Note that if a Participant submits incomplete or erroneous reports or fails to notify the Division of incomplete or erroneous reports, the Division may take measures, including disciplinary measures, when it deems justified to do so under the circumstances.

Q8: I am a Participant and have failed to submit the required reports by the prescribed deadline. What should I do? (amended on December 14, 2022)

A8: Participants are required to submit reports in the prescribed manner on a daily basis. In the event a Participant fails to submit its daily report via the GUI client application or API by the prescribed deadline, the Participant must submit its report via the GUI client application or API as soon as practicable. Note that late submissions are subject to [late filing fees](#).

Q9: Should inactive accounts be deleted from the LOPR account records? How are they deleted?

A9: The Rules do not require a Participant to submit a report confirming that there are no positions to be reported for inactive accounts. While there is no regulatory requirement to delete inactive accounts in the LOPR accounts records, the Division recommends deleting inactive accounts as a best practice. Participants should contact the [Derivatives Technical Operations](#) to obtain the *Position Report Manager User Guide for Approved Participants* which explains how to delete inactive accounts.

Q10: May positions submitted via the GUI client application or API be deleted? (added on December 14, 2022)

A10: Participants should only delete positions that were inadvertently reported. Otherwise, Participants should not delete positions (current and past report dates) from the GUI client application or API.

Q11: How can a Participant who has delegated reporting to a third party ensure that all information transmitted to the Bourse is complete and accurate? (amended on December 14, 2022)

A11: A supervisor user is available for the GUI client application and API and allows a Participant to monitor the account and position information submitted on its behalf. The Participant may sign in to the [TMX Axis portal](#) or contact the [Derivatives Technical Operations](#) to create a supervisor user. Note that pursuant to subparagraph [6.500\(l\)\(v\)](#), a delegating Participant remains responsible for the obligations in Article [6.500](#) and must ensure that all the information transmitted to the Bourse by the delegatee is complete and accurate.

² For the purpose of this FAQ, corrections are limited to erroneous or incomplete LOPR account records or position records provided for a given reporting day. This excludes any information regarding position transfers occurring after the reporting deadline (trade breaks, allocation errors, reconciliation, out trades).