

**CIRCULAR 074-24**

June 21, 2024

**CLIENT AND ORDER IDENTIFIERS -  
EXTENSION OF COMPLIANCE DEADLINE**

On December 7, 2023 the Regulatory Division (the “Division”) of Bourse de Montréal Inc. (the “Bourse”) published Circular [144-23](#) to self-certify amendments to the rules of the Bourse regarding client and order identifiers (the “Client and Order Identifiers requirements”). These requirements will become effective on June 28, 2024, after market close, and the Division’s expectation was for Approved Participants (the “Participants”) to be in compliance with these requirements by no later than October 1<sup>st</sup>, 2024.

The Division received notifications from some Participants expressing possible delays to implement the requirements and in some instances, exemption requests from Participants who identified challenges to be in compliance by October 1<sup>st</sup>, 2024. The Division acknowledges the progress of most Participants on the implementation work undertaken, the reliance on system providers to release the necessary updates, the additional time needed to conduct tests and the need to make adjustments to ensure compliance. The Division also takes note of the additional challenges and complexity Participants with retail operations are facing.

In light of the foregoing, the Division decided to extend the timeline for Participants to ensure compliance with the Client and Order Identifiers requirements and is therefore establishing the compliance deadline to March 31<sup>st</sup>, 2025.

All publications relating to the Client and Order Identifiers requirements are accessible on the [Client and Order Identifiers webpage](#) of the Division.

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

- [info.mxr@tmx.com](mailto: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

Karen McMeekin  
President, Regulatory Division of Bourse de Montréal Inc.