

<input checked="" type="checkbox"/>	Trading – Interest Rate Derivatives	<input checked="" type="checkbox"/>	Back-office - Options
<input checked="" type="checkbox"/>	Trading – Equity and Index Derivatives	<input type="checkbox"/>	Technology
<input checked="" type="checkbox"/>	Back-office – Futures	<input checked="" type="checkbox"/>	Regulation

**CIRCULAR**  
May 21, 2013

### **GATEKEEPER REPORT**

Bourse de Montréal inc. (the Bourse) wishes to remind all approved participants that, as prescribed by article 4002 of the Bourse’s Rules, they have an obligation to inform the Bourse in writing of any situation of actual or potential non compliance with the regulations of the Bourse. The gatekeeper report set up on the Regulatory Division website is the conduit that must be used for providing the Bourse with such notification.

The gatekeeper report should normally be submitted by the Chief Compliance Officer of the firm or, as the case may be, by compliance officers designated to this effect. Situations to report include those that involve or appear to involve deceptive and/or manipulative trading activities in the derivative instruments listed on the Bourse that are, actually or potentially, detrimental to the Bourse, to the market or to the public in general. Reportable situations include, but are not limited to;

- front running;
- non respect of client priority;
- erroneous order identification;
- non-compliance with the procedures of the Bourse regarding special terms transactions (block trades, EFPs, etc.), cross trades and pre-arranged trades;
- transfer of financial advantage;
- wash trades;
- trades with no change in beneficial ownership;
- manipulating the opening/close, including practices such as spoofing or layering;
- fictitious activity;
- trading using privileged information;
- deliberate triggering of stop orders;
- failure to submit position reports (LOPR); and
- illegal back-office transfers.

Circular no.: 94-2013

Upon identification of any actual or potential violations it is expected that approved participants will provide the Bourse with all relevant details such as, but not limited to; period (date), time, disclosure of parties/counterparties, instrument, price, account numbers and appropriate explanations. In order to allow for a maximum amount of information, all relevant comments and supporting documentation should be provided as attachments to the report.

The “**Gatekeeper Form**” portal is accessible through the Regulatory Division website on the left hand side within the **Complaints** section at <http://reg.m-x.ca/en/gatekeeper/login> . Reports can be filed whenever pertinent information regarding potential infractions to the Bourse’s Rules and Procedures have been detected.

The Regulatory Division has provided a password to the compliance departments of approved participants of the Bourse in order to access the gatekeeper portal.

For further information, please contact Ms. Nathalie Tessier, administrative technician, Regulatory Division, at 514 787-6552 or by e-mail at [ntessier@m-x.ca](mailto:ntessier@m-x.ca).

Jacques Tanguay  
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