

KYC + KYP Checklist

Mandatory KYC fields under NI 31-103 §13.2, firm-level + rep-level KYP, risk profile construction, concentration analysis.

16-point mandatory KYC fields

- Full legal name, date of birth, SIN
- Residential address (verified)
- Employment (employer, occupation, industry)
- Annual income, net worth, liquid net worth
- Investment objectives (income, growth, capital preservation)
- Time horizon (short, medium, long)
- Risk tolerance (subjective willingness)
- Risk capacity (objective ability to absorb loss)
- Investment knowledge (none, basic, good, sophisticated)
- Trusted contact person (encouraged, opt-in)
- Citizenship + tax residency (FATCA + CRS)

Firm-level KYP (CIRO Rule 3300)

- Product due diligence: structure, risks, costs, target market
- Approved-shelf decision documented
- Periodic re-review of approved products

Rep-level KYP

- Understand any product before recommending
- Know features, fees, risks, comparable alternatives
- Document the basis for the recommendation

Risk profile construction

- Risk tolerance is the client's subjective willingness
- Risk capacity is the objective ability to absorb losses
- Lower of the two governs the recommendation
- Document the basis for both numbers

Concentration analysis (account-as-a-whole)

- >10% in a single security: flag for review
- >20%: typically requires written client acknowledgement
- Sector and geographic concentration also matter

Read the live cheat sheet

Trigger events, KYP for proprietary vs third-party.

<https://ciroexam.ca/cheat-sheets/kyc-kyp-checklist>
