

# RSE Suitability Checklist

KYC triggers, NI 31-103 §13.2/§13.4/§13.5, CIRO Rule 3401 + 3402, concentration thresholds.

---

## 16-point KYC trigger events

- Change in income, employment, or pension status
- Change in dependants (marriage, divorce, birth, death)
- Change in investment objectives or risk tolerance
- Change in time horizon or liquidity needs
- Material change in net worth or debt
- Inheritance, lawsuit settlement, lottery
- Retirement or imminent retirement
- Change in residency or citizenship status
- Change in beneficiaries or trusted contact person
- Trigger of any internal firm threshold for refresh

## NI 31-103 mandatory KYC content (§13.2)

- Personal details: name, address, date of birth, SIN, employer
- Financial details: income, assets, liabilities, net worth
- Investment objectives, time horizon, risk tolerance, risk capacity
- Investment knowledge level
- Identity verification per PCMLTFA

## Suitability thresholds (firm policy specific)

- Concentration flag: typically >10% in single security
- Acute concentration: typically >20%
- Lower of risk tolerance and risk capacity governs
- Account-as-a-whole assessment under CIRO Rule 3402

## Borrowing-to-invest pre-trade disclosure (NI 31-103 §13.13)

- Required when client uses borrowed funds to purchase securities
- Includes risk of margin call, magnified losses, interest cost
- Must be in writing, before the trade

### Read the live cheat sheet

Mini-quiz, KYC content matrix, OBA disclosure.

<https://ciroexam.ca/cheat-sheets/rse-suitability-checklist>

---



