

## Appendix 3 – Impact Assessment

Description of Proposed Amendment	Related intended benefits	Impact on clients	Impact on issuers	Impact on Participants or Access Persons	Impact on Marketplaces	Impact on CIRO
<p><i>Adding a definition of Net Asset Value Order to UMIR 1.1 and an associated designation required under UMIR 6.2</i></p>	<p>Proposed Amendment would support increased transparency associated with the execution of trades in ETFs that are at a price that references NAV. These orders may be permitted to trade-through better-priced orders pursuant to NI 23-101, and market participants may benefit from the additional context provided by a publicly disclosed marker.</p>	<p><i>Positive</i>– Clients may benefit from increased transparency regarding the nature of certain trades in ETFs.</p>	<p><i>Neutral</i> – Proposed Amendment is not expected to materially impact issuers, including issuers of ETFs.</p>	<p><i>Positive</i> – Participants or Access Persons may benefit from increased transparency regarding the nature of certain trades in ETFs. Participants may also need to modify their policies and procedures as needed.</p>	<p><i>Neutral</i> – Proposed Amendment is not expected to materially impact marketplaces, other than potential costs associated with the implementation of a new NAV order designation.</p>	<p><i>Neutral to Positive</i> – While the Proposed Amendment is generally expected to be neutral, CIRO may see some positive benefits in relation to surveillance of trading that are associated with increased transparency regarding the nature of certain trades in ETFs. Certain CIRO policies associated with the review of trading activity will need to be modified to provide for the review of the use of the NAV order designation.</p>

Description of Proposed Amendment	Related intended benefits	Impact on clients	Impact on issuers	Impact on Participants or Access Persons	Impact on Marketplaces	Impact on CIRO
<p><i>Amending the definition of “intentional cross” under UMIR 1.1 to remove the prohibition on the use of a jitney order on one side of the trade</i></p>	<p>Proposed Amendment is intended to remove an outdated and unnecessary prohibition in UMIR. The intended results are potentially improved trading outcomes and ease of order execution for market participants.</p>	<p><i>Neutral to Positive</i>—Proposed Amendment is expected to have a positive impact on some clients that may see improved execution outcomes for certain orders.</p>	<p><i>Neutral</i> – Proposed Amendment is not expected to have an impact on issuers.</p>	<p><i>Neutral to Positive</i> – Proposed Amendment is expected to have a positive impact on Participants and Access persons that may see improved execution outcomes and ease of order execution for certain orders.</p>	<p><i>Neutral</i> – Proposed Amendment is not expected to have any material impact on marketplaces. Marketplaces may continue to enforce their own priority and allocation rules without an equivalent prohibition in UMIR.</p>	<p><i>Neutral to Positive</i> – The Proposed Amendment is responsive to industry concerns and updates UMIR to better reflect the structure of Canadian capital markets. It removes an unnecessary prohibition that introduces trading complexities and may impact trading outcomes.</p>