

**CIRCULAR 097-22**

August 4, 2022

**HEARING BEFORE THE DISCIPLINARY COMMITTEE  
OF BOURSE DE MONTRÉAL INC.**

**HSBC SECURITIES (USA) INC.**

The Disciplinary Committee of Bourse de Montréal Inc. (the “**Bourse**”) will hold a hearing on **September 26, 2022 at 9:30 a.m.** by videoconference, in order to adjudicate an offer of settlement negotiated between the staff of the Regulatory Division of the Bourse and HSBC Securities (USA) Inc. (“**HSBC**”), in connection with a disciplinary complaint filed against HSBC.

The proposed offer of settlement concerns the following allegations:

1. During the period from July 24, 2015 to September 23, 2019, HSBC contravened article 6366 A) (article 3.4 from January 1, 2019) - “Access to Electronic Trading” and article 7403 (article 3.400 from January 1, 2019) - “Application for Approval as an Approved Person” of the Rules of the Bourse (the “Rules”), by providing access to eight (8) of its employees, for various periods varying between 215 days and 1,515 days, to the electronic trading system of the Bourse without having obtained the prior approval of the Bourse;
2. During the period from July 24, 2015 to June 30, 2020, HSBC contravened article 3011 (article 3.100 from January 1, 2019) - “Surveillance and Compliance” as it did not establish and maintain a system to supervise the activities of each employee that is reasonably designed to achieve compliance with the Rules and Policies of the Bourse, more specifically as it did not establish policies and procedures to ensure that only its designated personnel approved by the Bourse, and who has received the required training, had access to the electronic trading system of the Bourse.

In accordance with article 4.302 of the Rules of the Bourse, this hearing will not be open to the public.

For further information, please contact Jean-Pierre St-Cyr, Senior Legal Officer, Legal and Regulatory Affairs at (514) 829-4034 or by e-mail at [jean-pierre.st-cyr@tmx.com](mailto:jean-pierre.st-cyr@tmx.com).

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