



REGISTRATION REQUIREMENTS FOR ROBO ADVISORY SERVICES

The provisions of [the Commission's Rule on Corporate](#) and Individual Advisers shall, with all necessary modifications, apply.

Additional Regulatory Requirements for Digital (Robo) Advisers

- (i) A Robo Adviser is required to comply, on an ongoing basis, with all the applicable business conduct requirements set out in the Investment and Securities Act (ISA) and the Rules and Regulations, Notices and Guidelines issued pursuant to the ISA.
- (ii) Where a Robo Adviser outsources the development and maintenance of their client-facing tools to a third party provider, the third party provider is not required to be registered by the Commission.
- (iii) A Robo Adviser shall nonetheless subject the third party provider to appropriate due diligence processes in order to assess the risks associated with the outsourcing arrangement.
- (iv) Where a Robo Adviser also provides portfolio/fund management services to the client and the client decides on an alternative investment decision contrary to the recommendation of the Robo Adviser, the Robo Adviser shall rely on the client's order and obtain a written decision/mandate from the client, highlighting in writing that the client is aware of their responsibility of the investment outcome and suitability of his/her investment decision.
- (v) A Robo Adviser who wishes to perform the function of portfolio management shall apply to the Commission to be registered as a Fund/Portfolio Manager and shall comply with the applicable Rules and Regulations governing Fund/Portfolio Management Function.