Employee Code of Conduct

Rules are rules, and regulators require firms to have strict rules regarding employees' personal conduct.

Our Employee Code of Conduct solution is designed to help firms and their employees comply with securities laws/regulations and internal policies:

- **Disclosure** – ensure employees request/report: personal investments, gifts/entertaining, as well as external positions, conflicts of interest, etc.

- **Compliance** – require employees to periodically acknowledge their regulatory/legal obligations as well as obligations to the firm and clients

Off the Shelf Solution

The Employee Code of Conduct solution meets regulatory requirements "off the shelf":

- **No software** – browser based so no installation
- **No hardware** – hosted on Microsoft Azure
- **No configuration** – load your users and you are good to go

Great Value

Pre-configured to give you Employee Code of Conduct management at a low price.

- **Standardised** – regulatory controls built once and used across regulated firms, achieve compliance with an "off the shelf solution"
- **Multiple Regulators** – simply add "solution" for each relevant regulator on single system
- **Customise** – easy to add/edit controls/checks

Key Features

Powerful inbuilt security and internal controls to efficiently manage and evidence your Employee Code of Conduct management:

- **Regulated Firms** – log and manage your Employee Code of Conduct at group or country level

- **Incident Management** – identify potential breaches of business and/or regulatory rules

- **Augment** – option to add/edit controls for specific country/business management or regulator requirements

- **Management Information** – extract recorded data and filter for management or regulators

Employee Code of Conduct Requirements

GRC-Maestro supports Employee Code of Conduct management requirements whether you have a single or multiple regulated firms and whether the firms have a single or multiple regulators.
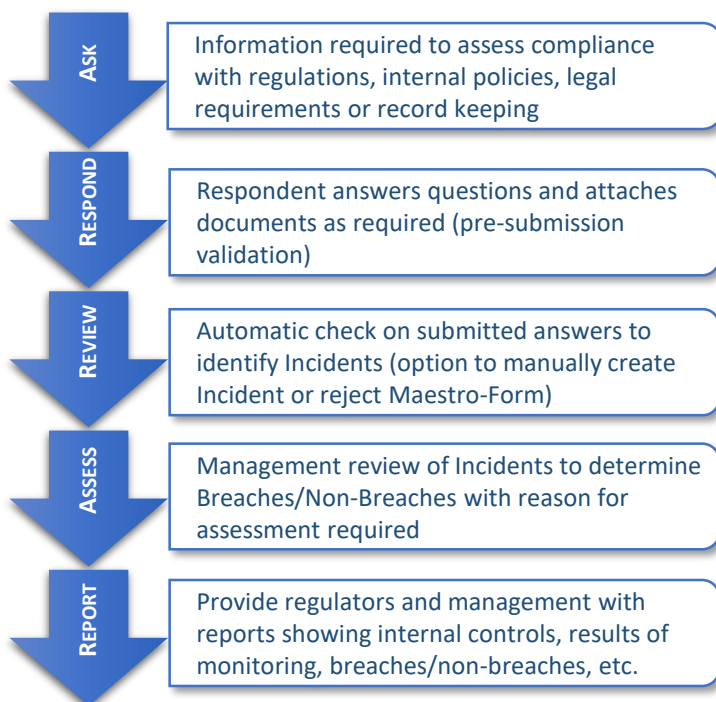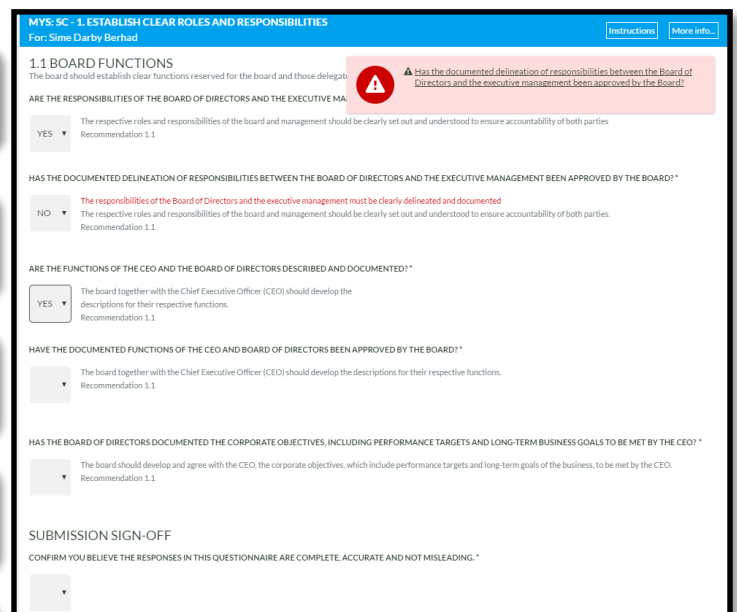
The Employee Code of Conduct can be varied or augmented for employees based on their business line, location, seniority or customised for individual employees.

Checks and record keeping can be implemented to meet your legal or regulatory requirements and can include provisions to ensure employees are working diligently for the firm.

Regulatory Requirements/Best Practice

- **Procedures**: Management should periodically review the Employee Code of Conduct to ensure it meets the local regulatory and business requirements

- **Implementation Review**: The operation of the Employee Code of Conduct management procedures should be periodically reviewed to ensure employees are following the procedures

- **Incidents/Breaches**: If Employees are not following the Code of Conduct each instance must be investigated and resolved

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Ask, Respond, Review, Assess, Report and Record

Ask — Information required to assess compliance with regulations, internal policies, legal requirements or record keeping

Respond — Respondent answers questions and attaches documents as required (pre-submission validation)

Review — Automatic check on submitted answers to identify Incidents (option to manually create Incident or reject Maestro-Form)

Assess — Management review of Incidents to determine Breaches/Non-Breaches with reason for assessment required

Report — Provide regulators and management with reports showing internal controls, results of monitoring, breaches/non-breaches, etc.

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