



Ethics & Compliance Culture Management

Regulators are leading a drive to raise ethical standards across financial services by requiring firms to implement an “Ethics & Compliance Culture”.

Our Ethics & Compliance Culture solution is designed to:

- **Manage** – ensure firms proactively manage their ethics & compliance culture
- **Oversee** – give senior management a clear view of ethical issues and conduct
- **Evidence** – show how firms implement, monitoring and improve their ethics and compliance culture
- **Educate** – inform all employees of the firm's ethical & compliance standards

Off the Shelf Solution

The Ethics & Compliance Culture 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 Ethics & Compliance Culture 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 Ethics & Compliance Culture Management:

- **Regulated Firms** – log and manage your Compliance Culture at group or country level
- **Incident Management** – identify potential breaches of ethical/culture rules and resolve
- **Augment** – option to add/edit controls for country/business management or regulators
- **Management Information** – extract recorded data and filter for management or regulators

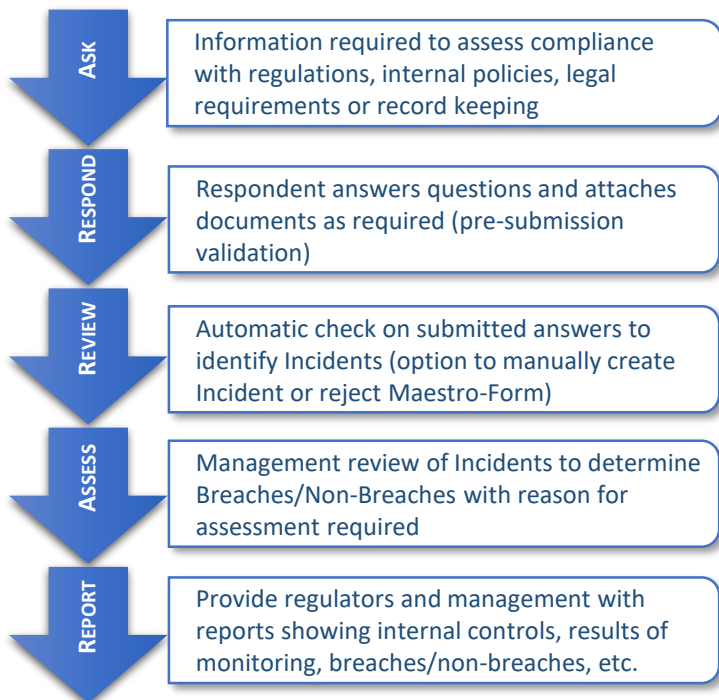
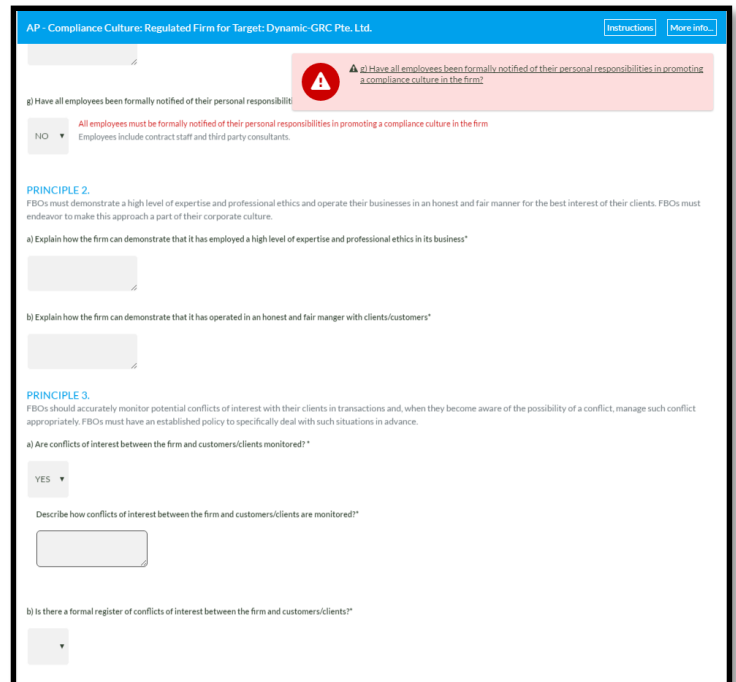
Ethics & Compliance Culture Requirements

GRC-Maestro supports your Ethics & Compliance Culture Management requirements across your organisation, whether you have a single regulated entity to multiple entities with different regulators.

Regulatory Requirements/Best Practice

- **Policies:** Senior Management should regularly review the Ethics & Compliance Culture to ensure actions are taken to improve the business ethics and employee conduct
- **Customer Focus:** Document the monitoring and actions taken to ensure customers/clients have been treated fairly (charges/commissions, complaint handling, advice/suitability, trading, etc.)
- **Conflicts of Interest:** Identify actual and potential conflicts of interest between the firm and customers/clients and between customers/clients along with the controls to safeguard them
- **Employment Practices:** Implement Ethics & Compliant Culture into employee's performance assessment, promotion, bonus calculations and disciplinary processes
- **Record keeping:** Capture information to evidence the firm's Compliance Culture management checks and controls

Ask, Respond, Review, Assess, Report and Record

AP - Compliance Culture: Regulated Firm for Target: Dynamic-GRC Pte. Ltd. Instructions More info.

g) Have all employees been formally notified of their personal responsibilities in promoting a compliance culture in the firm?

NO YES YES

All employees must be formally notified of their personal responsibilities in promoting a compliance culture in the firm
Employees include contract staff and third party consultants.

PRINCIPLE 2.
FBOs must demonstrate a high level of expertise and professional ethics and operate their businesses in an honest and fair manner for the best interest of their clients. FBOs must endeavor to make this approach a part of their corporate culture.

a) Explain how the firm can demonstrate that it has employed a high level of expertise and professional ethics in its business*

b) Explain how the firm can demonstrate that it has operated in an honest and fair manner with clients/customers*

PRINCIPLE 3.
FBOs should accurately monitor potential conflicts of interest with their clients in transactions and, when they become aware of the possibility of a conflict, manage such conflict appropriately. FBOs must have an established policy to specifically deal with such situations in advance.

a) Are conflicts of interest between the firm and customers/clients monitored?*

YES NO YES

Describe how conflicts of interest between the firm and customers/clients are monitored?*

b) Is there a formal register of conflicts of interest between the firm and customers/clients?*

YES NO YES

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