

# Establishing a compliant culture

Horrible Histories!

# Conduct Rules

1. You must act with integrity.
2. You must act with due care, skill & diligence.
3. You must be open & cooperative with the FCA, the PRA & other regulators.
4. You must pay due regard to the interests of customers & treat them fairly.
5. You must observe proper standards of market conduct.

# Senior Managers

- You must take reasonable steps to ensure that the business of the firm for which you are responsible is controlled effectively
- You must take reasonable steps to ensure that the business of the firm for which you are responsible complies with the relevant requirements and standards of the regulatory system
- You must take reasonable steps to ensure that any delegation of your responsibilities is to an appropriate person and that you oversee the discharge of the delegated responsibility effectively
- You must disclose appropriately any information of which the FCA or PRA would reasonably expect notice



WHY?

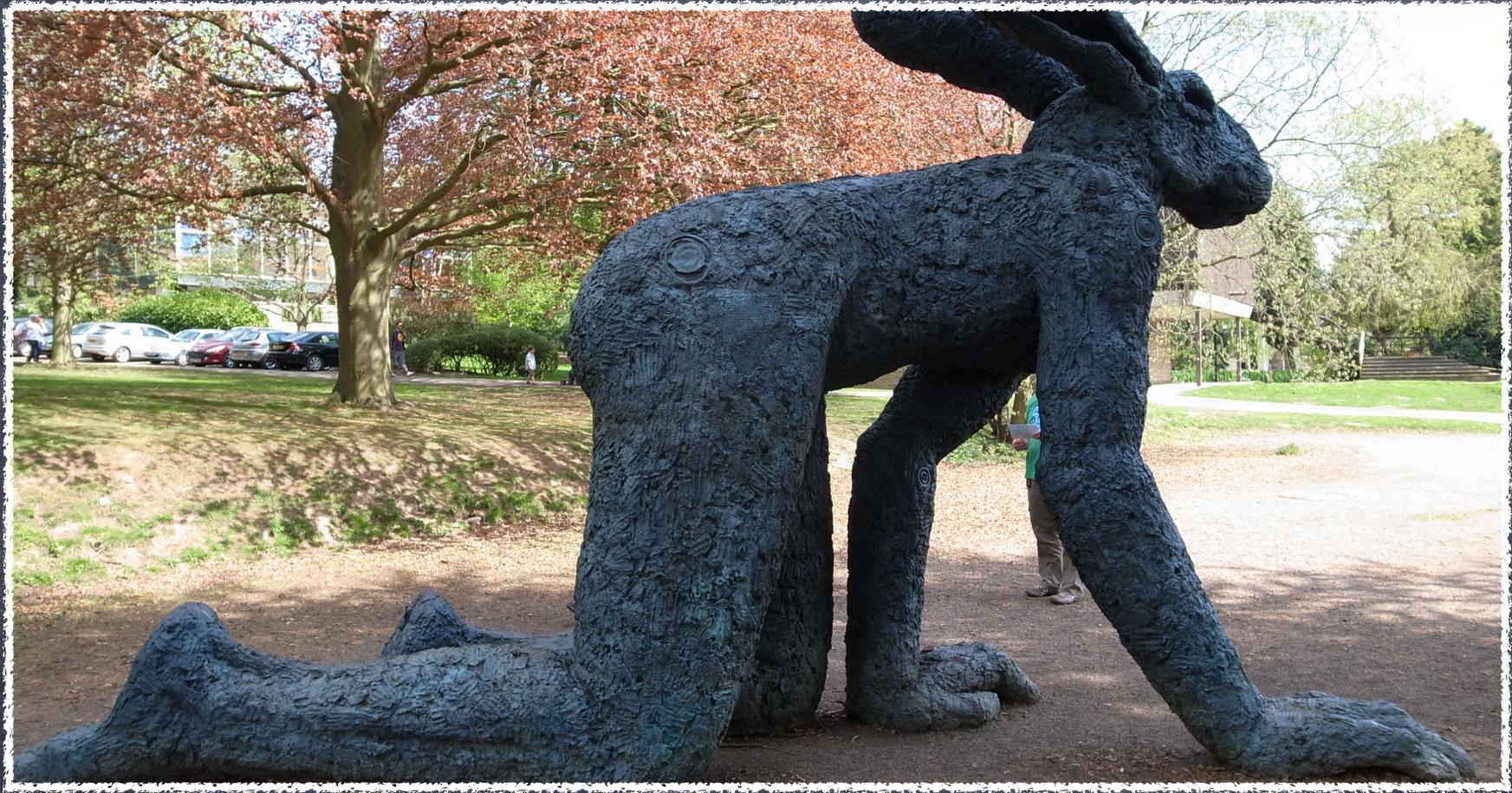
Because people have been naughty



WHO?

Who are these dreadful people?

What you perceive as wrong and  
what is actually wrong are two  
different things - look deeper.

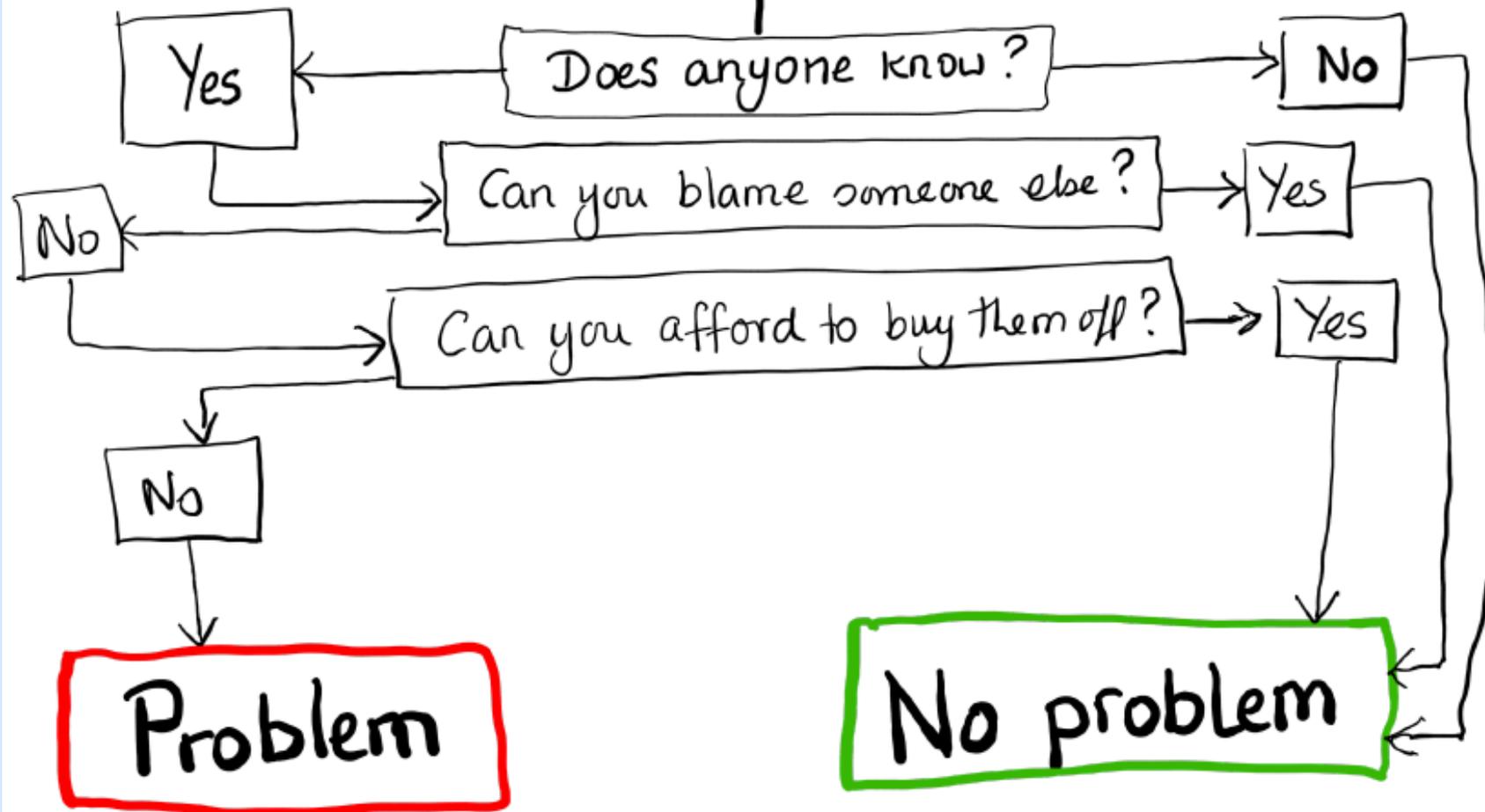


How hard can it be?

getting it right

# PROBLEM SOLVING

You messed up!



Combat problems, issues and  
catastrophes by being  
truthful, honest and diligent.



A regulator calls

Extremely unlikely?

The state of your records, the manner of your supervision and your attitude towards others determines your culture and in turn that of those around you.

## • Learning objectives

- Understand the 'why' behind regulatory rules.
- Be able to recognise good and bad culture.
- Explore ways of implementing best practice.
- Know what to expect from regulatory attention

# Stories

The End

