

Job Description for Compliance Manager

1. Overview of the role

The role is responsible for:

- I. monitoring on a regular basis, in order to assess the adequacy and effectiveness of the measures and procedures put in place and the actions taken to address any deficiencies in Guardian's compliance with its obligations; and
- II. advising and assisting the relevant persons responsible for carrying out regulated activities to comply with Guardian's obligations under the applicable regulatory system.

2. Responsibilities include:

Risk Assessment

Maintain Guardian's Compliance Risk Universe report by making sure it is up to date on an ongoing basis by:

- identifying, prioritising and documenting major risks; and
- overseeing the process of introducing controls to manage and mitigate such risks.

Policies and procedures

- Assist in the design, implementation and periodic review of the company's policies and procedures.
- Ensure that all policies and procedures extend to the identification and control of potential regulatory risk.
- Monitoring that Group standards are maintained within the Company and that policies and procedures are adequately documented.
- Monitoring that staff are made aware of changes made to policies, either as a result of their annual review or as and when they are updated for any reason.

Education and advice

- Implement changes in policies, organisation, procedures and processes developed by the regulators and internally in such a way that all relevant parties understand and support these changes.
- Educate staff on the policies, procedures, laws and regulations that impact the business.
- Act to increase awareness of the policies, procedures, laws and regulations that impact the business.
- Co-ordinate compliance training and education.
- Provide commercial and positive advice to the business in a timely manner.

Monitoring

Execute a monitoring programme undertaken on a quarterly basis.

Reporting

- Following all monitoring reviews, produce formal written reports addressed to senior management in the business and the Group Compliance and Legal Director to be presented to the Guardian board.
- Report outcomes to the ExCo.
- Group Compliance and Legal Director to present the results of monitoring, on a quarterly basis, to the Guardian Board, PS Risk Management Committee, the PS Audit Committee and the PS Board.

Corrective action

- Act in a consultancy capacity to document, agree and oversee the implementation of any necessary corrective action.
- Monitor timely implementation of corrective action.
- Escalate failures to implement corrective action to the Group Compliance and Legal Director.

Liaising with Scottish Friendly

- Provide pro-active and open dialogue with Scottish Friendly.
- Manage any requests for information from SFA.
- Take part in monthly compliance calls with Scottish Friendly

Consumer Duty

Promote awareness of consumer duty across Guardian, ensuring that proactive action is taken to identify those customers who require enhanced support and, as a result, should be categorised as vulnerable customers.

Management of the Firm's affairs through membership of and/or participation in relevant boards, committees, working groups and other such forums.

Reporting

Submitting to individual's manager:

- Appropriate management information (including legal entity reporting where appropriate) highlighting relevant issues with appropriate frequency; and any other reports requested.
- Reporting verbally and/or via written reports to relevant committees, boards and working groups or otherwise as requested or required in the normal operation of these bodies and forum.
- Immediately, bringing to the attention of the Group Compliance and Legal Director and/or any director of Guardian instances of fraud or money laundering.