



Culture

Financial institutions will need to examine their culture, including the habitual behaviours and mindsets that shape attitudes, decisions, and behaviours within their organisations through surveys or deep dives on risk culture. This will allow them to better understand their vulnerabilities, which in turn can be used to evolve their culture in order to promote the right behaviours, ensure strong risk management and accountability as well as improve monitoring across all business activities.



Conduct Framework

Firms will need to design and implement conduct risk frameworks to improve risk management discipline and accountability on supervision and surveillance activities. As well, they will need to build and implement processes and controls to meet regulatory expectations on fair outcomes for customers and protecting the integrity of the market place against abusive and manipulative practices.



Conduct Analytics

Firms will need to consider how they can leverage the use of data and analytics to proactively monitor and enhance their culture, as well as identify early warnings of misconduct. This can involve connecting the dots across different data silos; designing KPIs to link product sales or customer feedback, to individual performance, compliance, and HR data; as well as transforming low value added controls used to detect misconduct into more meaningful and actionable reporting for enhanced oversight by management and the Board.