



FIS EMPLOYEE COMPLIANCE MANAGER

FORMERLY PROTEGENT PERSONAL TRADING ASSISTANT

A comprehensive solution to address
employee facing compliance



With increased regulatory focus and stricter-than-ever sanctions for market abuse violations, a holistic, proactive compliance has never been more important.

For over three decades FIS has been providing monitoring solutions assisting with firms' adherence to mounting compliance requirements globally.

Our mission is to understand financial institutions' challenges and helping them close compliance gaps. By continuous enhancement of our solutions suite, we offer firms a wide range of intelligent products to monitor and manage employee related compliance every day, everywhere.

FIS® Employee Compliance Manager (formerly Protegent Personal Trading Assistant) is an online self-service application providing compliance teams a central location to monitor and manage employee related compliance activities.

It automates trade monitoring under Personal Account Dealing (PAD) requirements, firm's specific codes of conduct, internal policies and more.

Employee Compliance Manager combines the benefits of a comprehensive, off-the-shelf solution with the adaptability and flexibility of custom-built technology.

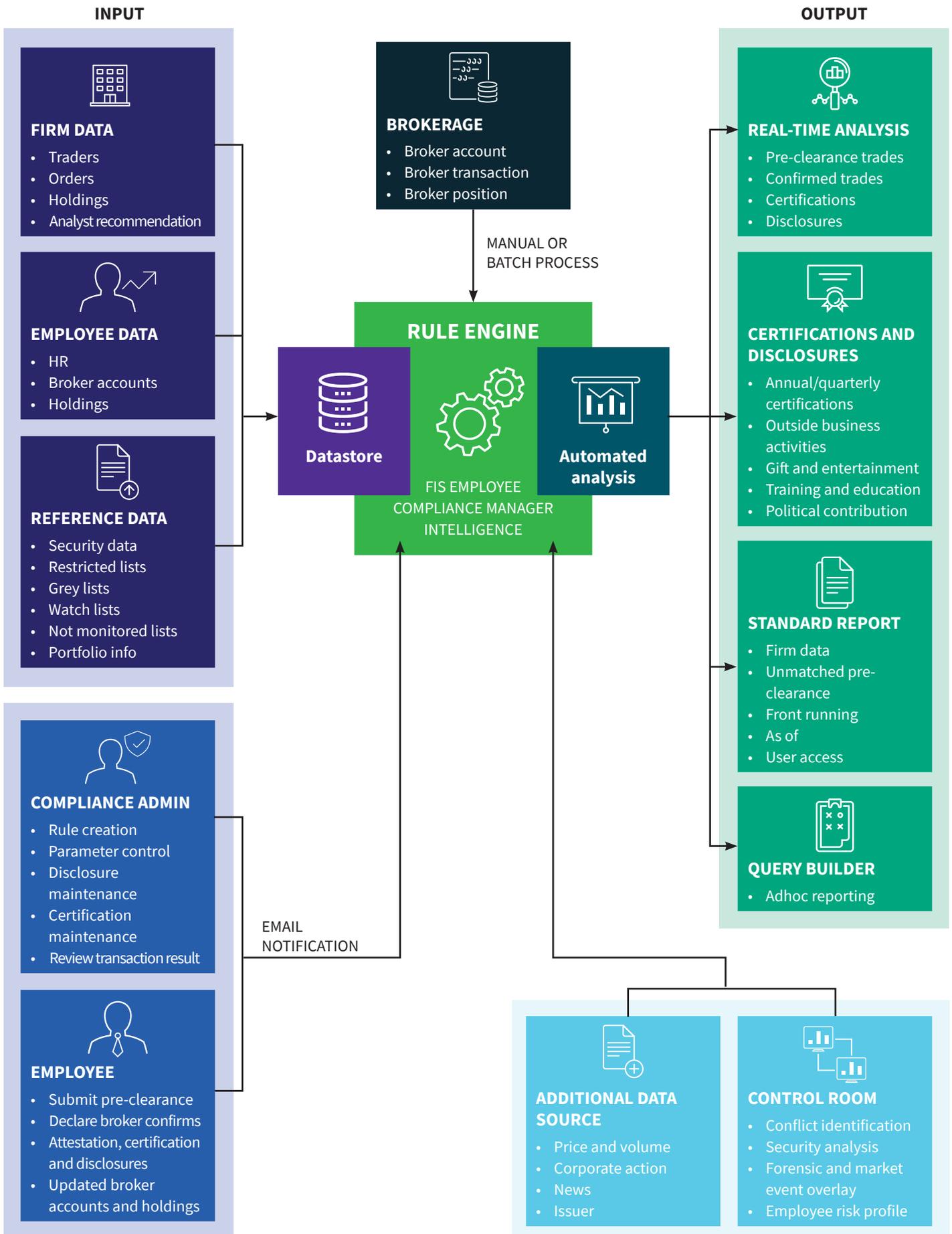
The solution helps firms maintain controls in place for management of potential conflicts of interest and market abuse risks.

Product highlights

Employee Compliance Manager competently addresses business challenges faced by the financial services organisations.

| Business Challenge | Benefit |
|---|---|
| Proactive surveillance across regulations and jurisdictions | Real-life monitoring of activities against relevant global and local regulations, internal policies, codes of conduct, etc. |
| Reference the myriad of data | Full assessment of relevant information, documents storage and lookup in one place Effective decrease of compliance paperwork |
| Compliance efficiency | Centralised location to streamline employee related compliance Full processes' automation delivering decisions in seconds |
| Process enablement | Fast, easy access from desktops and mobile devices |
| Effective management of IT challenges | Minimised IT requirements and expedite deployment with flexible hosting via FIS' infrastructure Reduced TCO and project delivery times |

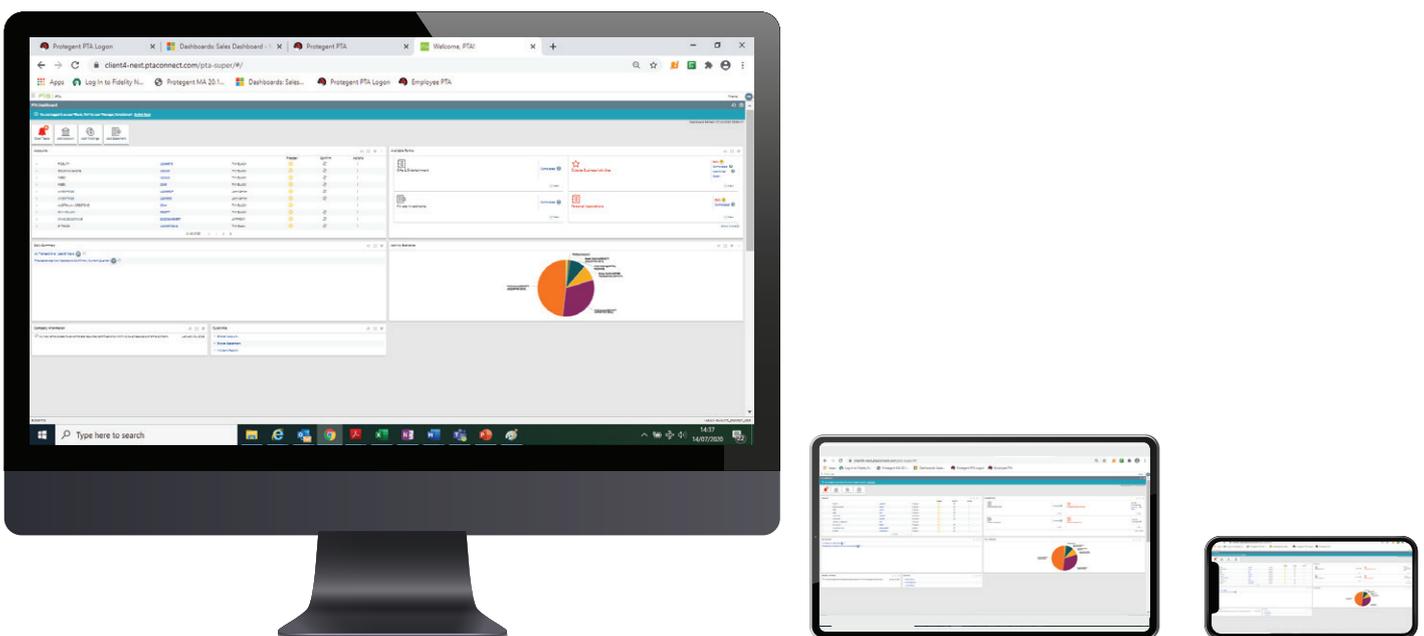
Employee Compliance Manager



Employee Compliance Manager functions

- Streamlined load of employee brokers' account information including holdings, positions and executed transactions
- Scheduled, periodic confirmations of holdings, broker accounts, transactions, codes of conduct policies affirmations compliance questionnaires, etc.
- Online employee pre-clearance and post-trades activities capture, including broker statement online tracking
- Firm-specific certificates and disclosures, including gifts and entertainment, outside business interests, political contributions, charitable donations, etc.
- Real-time dashboard alerts, daily task lists and targeted notifications
- Multiple policies management in one place. Trade monitoring and analysis with over 180 configurable rules
- Policy violation case management including workflows with automated overdue actions alerts and reminder
- Index of standard and ad hoc reports, including audit trails and history logs exportable to Excel or PDF
- Scalable solution using advanced, proven technology (Java EE, JBOSS, SQL Server)
- Easy integration with firm's OMS and HR systems
- Additional analytics of add-on Employee Compliance Manager modules: control room, deal team and insights
- Accessible from desktop, tablet and smart phone.

Employee Compliance Manager accessibility



Desktop, tablet and smartphone accessibility



EMPLOYEE COMPLIANCE

One solution for effective compliance

Personalised dashboard

Fully configurable dashboard to target specific elements of employees' compliance and conduct programs. Every role within the application can have a configured, specific daily summary to display items of interest, or those requiring action. The calendar and tasks functions can assist to schedule and track upcoming tasks. Compliance users have additional capabilities to create custom dashboard modules using the integrated query builder that can be used any time for day-to-day or ad hoc tasks like audit or regulatory enquiries.

Real-time pre-clearance requests

Every employee's personal transactions are entered into the system and analysed against firm specific rules. The variety of choices for compliance from fully automated pre-clearance processing, a manual approvals process, or a mix of both based on certain trade parameters significantly simplifies the process. The intuitive entry screen enables employees to submit pre-clearance requests with ease.

Employee Compliance Manager rules

The extremely powerful rules validation engine of Employee Compliance Manager offers granular definition of scenarios and arguments and their application to the relevant user levels: from an individual employee to the entire organisation. The solution provides over 180 ready-to-use rules that can be customised at every level, any time.

Some of the rules include:

- Blackout period
- Buy/sell limitations
- Deminimus
- Excessive trading

- IPO
- Open orders
- Pre-clearance
- Restricted securities, watch, grey lists
- Secondary offering
- Short selling
- Short-swings (potential wash trades)
- Short-swing profits (potential wash trades)
- Watchlist securities

Reporting capabilities

The reporting functionality of Employee Compliance Manager includes standard and ad hoc reports. Their generation can be scheduled with a notification message emailed via standard or encrypted means whenever required. Reports can be exported into either PDF or Excel (.csv) format for management reporting or further offline filtering.

Standard reports include:

- Front-running
- In and out trading
- Overdue certifications
- Restricted list holdings
- Executed trade validations
- Pre-clearance validations

Standard and custom certifications

A standard package of regulatory driven form templates can be used at any time of employee engagement: from initial holdings, periodic certifications to on-demand, ad hoc submissions upon request.

The templates include:

- Initial or annual holdings
- Broker accounts
- Quarterly or annual transactions
- Attestations to policies or the codes of conduct, ethics, etc.

Each form can have a defined reporting period with compliance teams receiving regular updates on completion. Automated reminder emails can be set up to target those who are late with their submissions. Forms can be customised to collect information in an easy to use format through the integrated forms builder. They can be used for annual attestations or as a confirmation of accuracy for previously submitted responses.

Custom disclosures

Employee Compliance Manager custom disclosures function offers flexibility of voluntary information submission. The forms builder enables creation of custom questions with specific types of answers like text free, date, value, radio buttons, drop down lists, etc. The responses can be automatically analysed to determine if additional scrutiny is required.

Case management

Employee Compliance Manager case manager enables compilation of several events and their management as a single, multi-event case. Supporting documentation can be attached to cases making the solution a complete source of information.

Document handling

Employee Compliance Manager offers the functionality of a documents repository, further streamlining the compliance process and allowing for all relevant information to be accessible from one place.

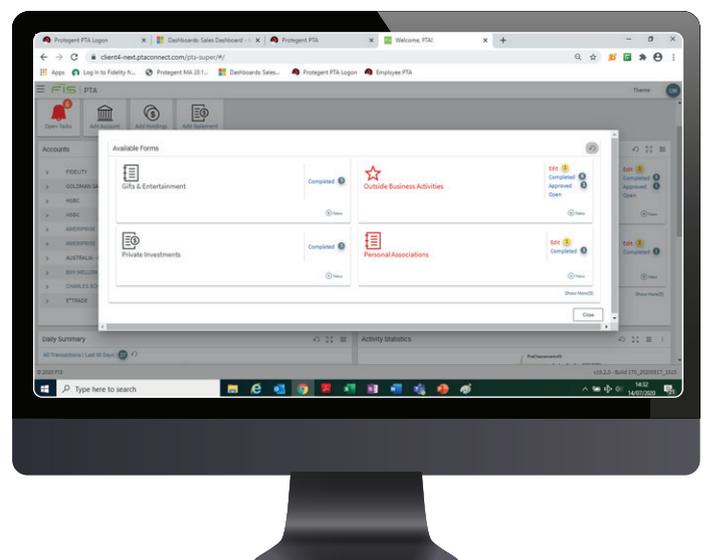
Automated delivery of employee account information

Employee Compliance Manager can electronically process executed trades. FIS has fostered technical relationships with a multitude of brokers enabling their feeds directly into the solutions where available. These files arrive over night to automatically run through the relevant rule set and create automated alerts ready on next business day. Availability is contingent upon the firm/broker agreement.

Statement tracking

Employee Compliance Manager is designed to automate and minimise the paper-based process. Where electronic brokerage feeds cannot be utilised, an online Statement Tracking tool is available to track, request, and report employee obligations. Reminder emails can be set up to notify employees when a statement is required. Compliance can use this information to verify the accuracy of pre-clearance requests raised by employees.

Code of conduct and internal policy tracking



Additional analytics capabilities

Control room module

The Employee Compliance Manager control room offers forensic analytics capabilities outside of traditional transaction surveillance. The advanced logic leverages market information sourced from Dow Jones News as well as corporate actions and events.

A flexible set of monitoring rules such as volume and price fluctuations, irregular trading patterns, and current news intersections, assist with building a bespoke employee risk profile.

This additional layer of analytics can be used to identify group pattern trading, potential misuse of Material Non Public Information (MNPI), and other conflicts of interest. Information is presented in a reviewable dashboard format and security analytics screen.

The module includes:

- Configurable alerts
- Customisable dashboards (control room specific)
- Security research
- Conflicts detection
- Market data feeds (news, corporate actions, price and volume)

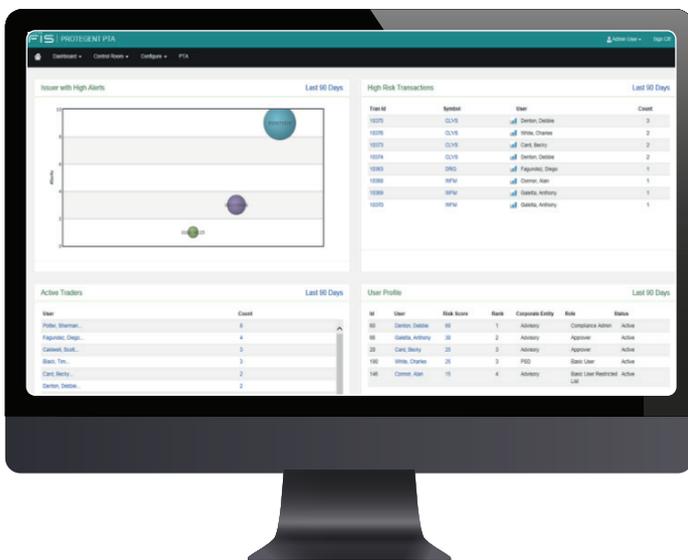
Insights

Employee Compliance Manager insights provides a fully web-based tool for data discovery, visualisation and analytics in a user-friendly interface which allows for data mining, story building, scalability and performance.

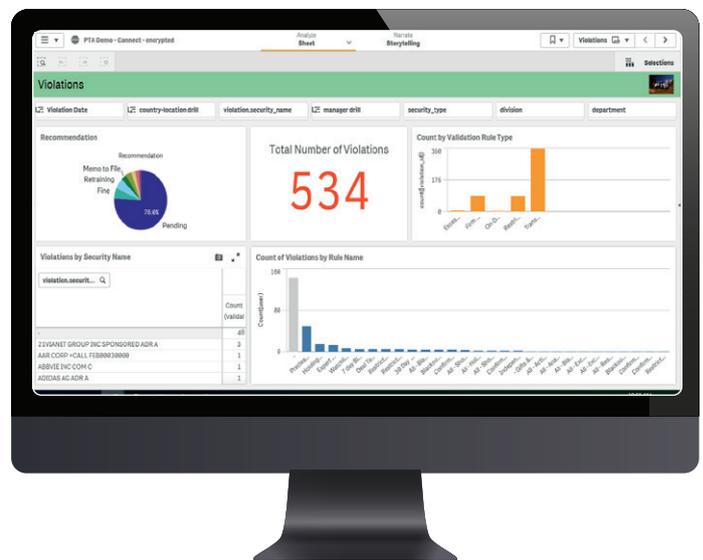
The insights module dashboards provide a holistic view of key risk areas. They focus on areas of risk such as violations, workflow items awaiting action and high-volume transactions/holdings.

The insights dashboards are powered by data directly obtained from your Employee Compliance Manager database. FIS-produced dashboards provide a holistic view for compliance, management, board and audit teams. Additional dashboards are available for clients who wish to design and build their own custom dashboards.

Employee Compliance Manager control room sample screen



Employee Compliance Manager insights sample screen



FIS Compliance Suite

Drawing from over three decades of intellectual capital, FIS has maintained its commitment to assist the financial industry with meeting the ever-increasing regulatory requirements. More than ever before the regulated organisations need efficient solutions to transform the challenges of increasing costs of compliance and associated infrastructure.

Employee Compliance Manager is the premier product for monitoring firms' employee personal trading against regulatory and firm defined guidelines in an intuitive way.

In addition to the risk mitigation Employee Compliance Manager offers an integrated paperless solution for trade surveillance, data archiving and reporting, removing disparate systems approach.

FIS® Compliance Suite (formerly Protegent) can further help firms streamline efforts and embed a culture of compliance.

FIS offers partnership in cost control and value maximisation while assuring compliance with existing in future regulations and risk mitigation.

Check our other Compliance Suite solutions like FIS® Market Surveillance Manager (formerly Protegent Market Abuse) to find out how FIS can help you move towards advanced world of compliance.

About FIS Trading Solutions

All FIS solutions are built on the foundation of three basic principles, aimed to help businesses make money, save money, and protect their firm.

While Compliance Suite help firms protect their firms' assets, customers, employees, and reputation, FIS trading products and services are engineered to provide more than just protection. Designed with a common element at their core – the customer – FIS trading solutions help them achieve increased performance, low latency and execution across multiple platforms, instruments and geographies.

A neutral trading environment is an effective way to maximize value by delivering top execution performance to customers, especially in complex industry conditions. By supporting the entire lifecycle of a trade, FIS trading products and services are positioned to help customers obtain peak performance in today's volatile and uncertain markets.

As a full service provider, you can rely on FIS to provide a single point of accountability. We focus on supporting the trade and helping you achieve cost reductions and additional revenue opportunities through FIS bundled trading solutions.

COMPLIANCE SUITE

About FIS

FIS is a leading provider of technology solutions for merchants, banks and capital markets firms globally. Our more than 55,000 people are dedicated to advancing the way the world pays, banks and invests by applying our scale, deep expertise and data-driven insights. We help our clients use technology in innovative ways to solve business-critical challenges and deliver superior experiences for their customers. Headquartered in Jacksonville, Florida, FIS is a Fortune 500® company and is a member of Standard & Poor's 500® Index.

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