



**MCO**  
MyComplianceOffice

# The Missing Link in Compliance:


Tracking Insider Risk from Access to Trade

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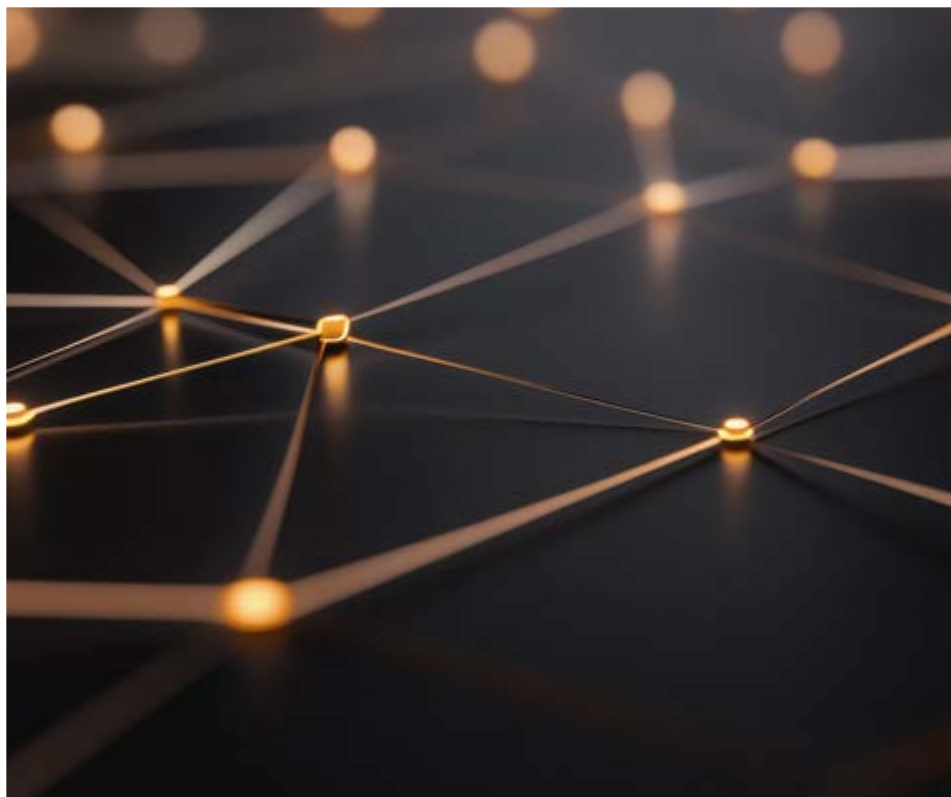
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**Compliance Built Better.™**



Controlling insider risk effectively requires a connected view of compliance controls across the firm—one that links access to inside information, employee activity, and review into a single, continuous process.

When personal account dealing, insider information management and trade surveillance are handled in isolation, compliance is left with gaps. When they are connected, firms can identify issues, mitigate risk, and demonstrate compliance in a consistent and defensible way.



# Insider risk isn't about any single control.

Effective insider risk management relies on managing a chain of events. And that chain of events doesn't start with a trade. It starts with access—to inside information, to deals, and to decisions.

Across jurisdictions, regulators expect firms to demonstrate how insider risk is identified, monitored, and addressed. The focus should not be on the number of controls in place, but on whether firms can understand and evidence how those controls operate together.



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**Who  
Knew?**

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**Who  
Traded?**

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—  
**What Happened  
Next?**

# Compliance as a Connected System

Most firms have controls for insider list management, employee trading oversight, and surveillance in place. The challenge is that when they operate independently, it's difficult to build a full picture of insider risk.

Managing insider risk as an integrated process requires keeping four elements aligned over time.

- 01 Access  
Who has exposure to insider information?
- 02 Awareness  
When did they receive it?
- 03 Activity  
Have they traded recently?
- 04 Connection  
Can you link access to action?

Did the employee use insider access to trade for personal gain?

# Follow the Chain of Insider Risk

Each link captures part of the truth—but in isolation never tells the full story.



## Link 1: Creation of Insider Information

Insider information begins when a material event emerges, for example, transactions, earnings results, or strategic decisions that are sensitive from the outset.

*This is the signal to start tracking.*

## Link 2: Identification and Tracking of Insiders

Individuals in possession of sensitive information are identified and added to insider lists to track and manage access. To be an effective control, an insider list cannot be a one-time effort. As information spreads beyond the initial distribution, roles change, and the deal or business initiative progresses, insider lists must be updated in real time.

*This is where spreadsheets are just not enough. Manual or delayed updates weaken the chain. A robust system and automation will enable firms to keep pace as insider information flows throughout the organisation.*



### Link 3: Employee Trading Activity

The personal account dealing process controls that employees follow firm policy by verifying preclearance, validating post-trade execution, and checking trading activity against insider and restricted lists to surface potential violations.

*This is where access to complete trading data is critical. Insider risk can hide in the details, for example did an employee trade on a different day or amount than stated on their preclearance?*

### Link 4: Surveillance and Review

Trade surveillance then provides firm-wide monitoring to identify suspicious trading patterns and potential market abuse by assessing trading activity in the context of insider information, restricted lists, and prior employee actions, ensuring issues are detected and investigated holistically rather than in isolation.

*This is where the links of the insider risk chain are connected.*

# How MCO Enables Firms to Connect the Chain of Insider Risk

MCO enables firms to manage core areas of compliance, including insider information, employee personal trading activity, and trade surveillance on a single compliance platform.



Management of Insider Information Tracks **Who Knew**

by mapping access to material events and identifying potential conflicts of interest.

Personal Account Dealing Tracks **Who Traded**

with a holistic view of employee trading and holding data.

Trade Surveillance Tracks **What Happened**

with an extensive rules engine to monitor trading and investment activities and flag policy violations.

MyComplianceOffice enables real-time oversight, stronger controls, and a defensible audit trail across the full lifecycle of insider information and personal trading risk. Enabling firms to:

- » Trace insider risk from end-to end
- » Quickly identify and respond to emerging issues
- » Produce clear records that stand up to regulatory review
- » Speed up the new business process
- » Reduce the risk of insider trading, market abuse and market manipulation

MyComplianceOffice provides a single view of **who** had access to inside information, **when** that access applied, and **what** activity followed.

**Ready to connect the chain of insider risk? Contact MCO today.**



**MCO (MyComplianceOffice) provides compliance management software that enables companies around the world to reduce their risk of misconduct and effectively oversee regulatory obligations.**

Our powerful platform lets compliance professionals demonstrate they are proactively managing the regulated activities of the company, employees and third-party vendors and provide evidence of regulatory compliance. Available as a unified suite or à la carte, our easy-to-use and extensible SaaS-based solutions get firms up and running quickly and cost-efficiently.