



Head of Financial Crime & MLRO

About Pepper Ireland:

Pepper Ireland is a leading asset manager and provider of third-party loan and advisory services. Established in September 2012, the company has operations in Dublin and Shannon, employing over 500 people.

Pepper in Ireland is part of the Pepper Group, a diversified, global financial services business. Pepper Group focuses on three key disciplines across the residential and commercial property sectors: Lending, Advisory and Asset Management. Pepper Group is headquartered in Australia, where it has been operating since 2001.

Pepper Ireland provides a range of end-to-end asset management, loan servicing and advisory services to organisations, including Irish and international financial institutions, wholesale funding institutions and loan originators, as well as Irish and international investors.

About this Role

The purpose of the Head of Financial Crime & MLRO role is to take responsibility for:

- AML/CFT and Sanctions compliance and ensuring that there is a robust AML/CFT Framework in place across all relevant business areas. This will include ensuring that the AML/CFT policy and procedures are implemented and adequate at all times; implementation of a risk-based AML/CFT approach; investigation/escalation of suspicious activity and sanction alerts; and preparation and delivery of training. You will work closely with first line of defense and second line of defense teams, including Operations; Finance; the MI team and Operational Risk.
- Fraud – ensure that a robust Fraud Policy and Investigation Framework is in place. This will include ensuring that policy and procedures are implemented and adequate at all times, setting out a clear framework for how the risk of fraud is dealt with in order to protect Peppers reputation and avoid financial loss, maintaining a “zero tolerance” approach to both internal and external fraud, and minimizing fraud risk in conjunction with the business.

Location: Dublin

Key Responsibilities:

- Act as functional MLRO for Pepper Finance Corporation Ireland and ensure an appropriate framework is in place with regard to compliance with the Criminal Justice (Money Laundering and Terrorist Financing) Act 2010, as amended, and other relevant legislation.
- Maintain and keep current the AML/CFT policy and procedures and that these standards are implemented across the business.
- Undertake annual assessments (more frequently if necessary) such as the Business AML/CFT Risk Assessment; MLRO Report; etc.
- Delegate AML activities to the AML & Fraud Team and oversee timely execution of these activities (e.g.: Transaction monitoring; Sanction and PEP screening; Enhanced Due Diligence; etc.).
- Provide specialist advice and reporting on AML/CFT; Sanctions; and Fraud related matters to business functions – including senior business leaders up to and including Board level to ensure all relevant regulatory and legal requirements are fully met.
- Participate and act as Subject Matter Expert for business development projects/portfolio migrations.
- Keep abreast of changes to legislation, regulatory and industry guidelines, and manage the implementation of same.
- Preparation of suspicious activity reports for communication to relevant authorities.
- Input to Operational Risk framework, enterprise risk reviews, and management of applicable risks/ controls for AML/CFT; Sanctions; and Fraud.

- Use qualitative and quantitative approaches to establish relevant management information, key reports and metrics.
 - Attendance at external meetings as required and develop/maintain strong external networks.
- ▶ **Fraud:**
- Ensure that the appropriate policy and procedures are in place and operational.
 - Maintain an integrated approach to the prevention and detection of fraud by promoting the awareness of fraud risks throughout Pepper.
 - Act as an advisor to the business and where necessary provide analysis of fraud risk to management.
 - Address incident reports relating to fraud and investigating fraud.
- ▶ **Education & Training:**
- Development and delivery of AML/CFT, including Sanctions, training (up to and including the Board) to ensure Policy and Procedures are embedded in all relevant functions.
 - Determine optimal training strategy, content and mode of delivery; maintain accurate and easily accessible training materials and records. Ensure all new hires are adequately trained on joining Pepper.
 - Evaluate the effectiveness of training delivered at multiple levels, including competence, participant feedback and behavioural changes.
- ▶ **Leadership & Team Development:**
- To successfully lead the team towards achieving the goals of the AML and Fraud team.
 - To ensure the ongoing and appropriate development of staff to enable them to achieve their full potential.
 - To create and maintain a positive culture within the team.
 - To ensure “living the values” of the organisation is the status quo.
- ▶ **Key Performance Indicators:**
- Development and maintenance of AML/CFT Policy and Procedures as required
 - AML/CFT matters covered in documented risk assessments and annual plans
 - Identification and mitigation of AML/CFT issues
 - Monitoring execution of action plans to address issues identified
 - Input to annual Risk and Compliance Plans
 - Monitoring and testing of controls for risks identified across the business
 - Robust policies and procedures in place and up-to-date and implemented across all relevant business functions
 - Level and quality of relevant training as measured by feedback from business and participants
 - Delivery of prompt and accurate advice to the business
 - Feedback from business areas
- ▶ **Skills & Experience:**
- 3rd level education to Degree or Master level (essential)
 - Suitable qualification such as Licentiate of Compliance Institute (LCI); Fellow of Compliance Institute (FCI); Certified Financial Crime Professional (CFCP); ACAMS certification/specialist; or legal qualification (essential)
 - Previous senior management experience in AML-related role in financial services with experience of implementation/maintenance of AML/CFT & Fraud framework
 - Excellent working knowledge of AML/CFT legislation and regulations, Sanctions, as well as Fraud policy and practice
 - Strong client service skills
 - Proven experience working across functions
 - Previous experience operating in a Compliance/Risk leadership position
 - Experience in design and delivery training courses
 - Audit/testing experience (desirable)
 - Presentation and PowerPoint skills (desirable)

▶ **Competencies:**

- Legal & Compliance – Level 3
- Risk – Level 2
- Accuracy & Quality – Level 3
- Analytical Thinking – Level 3
- Communication & Interpersonal Skills – Level 3
- Communication Skills – Written – Level 3
- Customer Service & Commercial Awareness – Level 2
- Developing Others – Level 3
- Influencing/Persuasion & Negotiation Skills – Level 3
- Judgement & Decision Making – Level 3
- Leadership – Direction & Goals – Level 3
- Project & Task Management – Level 2

Central Bank Requirements:

Please note that this role is a **Pre-Approval Controlled Function (PCF)** role under the Central Bank of Ireland's Fitness & Probity Standards and has been classified as a PCF-52. PCF-52 is ensuring, controlling or monitoring compliance by a regulated financial service provider with its relevant obligations. Where you accept the offer of this role, prior to the appointment, you will be required to abide by the Fitness and Probity Standards and complete a Fitness and Probity Questionnaire. Due diligence checks will also be completed on your qualifications and Continuous Professional Development (CPD).

Pepper is an equal opportunities employer

For more information or to apply email recruitment@peppergroup.ie