

# Remote/Hybrid Working

In December 2021, JPMorgan Securities agreed to pay \$200 million in fines after admitting that it failed to keep records of work-related communications made by employees on personal devices using personal email accounts and messaging apps. The SEC also announced that, as a result of its findings, it has commenced additional investigations into practices at other financial firms.

Whilst much of the activity at JPMorgan predated the pandemic, the recent increase in remote and hybrid working arrangements clearly amplifies the potential risks. Therefore, it is important that all staff understand their responsibilities when working remotely.

## #1

### Policies and procedures

You must follow your firm's remote working procedures (e.g. regarding transaction execution and communication methods).

These help the firm comply with the legal and regulatory requirements - e.g. **recordkeeping, order/trade surveillance** and **data protection**.

## #2

### Information security

Remote and hybrid working increase **information security risks**.

Make sure that all information (electronic and physical) is accessed, stored, transported and disposed of securely. Don't allow information to be accessed by unauthorised persons.

## #3

### Conduct and culture

Wherever you are working, you can (and should) **seek support from your manager or the Compliance team** if you have a question or concern about a legal, regulatory or operational issue (such as an information security, financial crime or conduct risk).

