Define Compliance Requirements and Assess Risks of New FinTech Projects

(without gap analysis torture and without having to fix all past issues first)

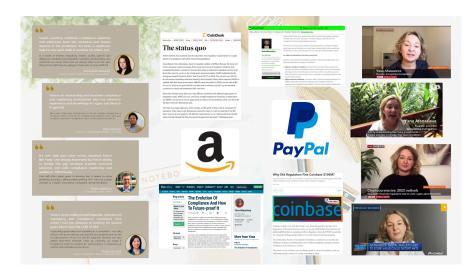
1. Why is this important?

<u>Our Goal</u>

At the end of this FREE training you will walk away with a simple step-by-step new project assessment plan using the ROI method, allowing you to communicate compliance requirements with clarity and objectivity that instantly get your stakeholders' buy-in and appreciation.

The majority of new mistakes, unfortunate decisions and unnecessary expenditures are made when new business projects are being assessed by compliance and new requirements are developed. You can NOW stop creating bad company legacy and perpetrating inefficient processes once and for all.

In more than a decade of working with FinTech and Crypto startups, having supported some of the most prominent industry leaders, I have come to realize that knowing laws and regulations and hard work contribute to about 10% of success in FinTech compliance. 90% of compliance performance depends on "diplomacy".



By diplomacy I don't mean being polite or collaborative, I mean being persuasive, able to demonstrate the value of compliance in a way that your business leaders understand by themselves, without you trying to convince them. Another big component of success in compliance is how you perceive and address various risks and make risk-based decisions, because your objectivity will determine your credibility with your team and your management.

And all of these aspects will be covered during this training.

Who is the training for and who is this not for?

You are in the right place if:

- You work (or aspire to work) in the FinTech, Payments, Crypto, Web2/Web3 space and a part of your job is to make decisions about how the company should prepare for new projects and what you can and cannot do.
- You would like to complete your assessment and make these decisions quicker and be able to incorporate what is essential and not spend time on non-essential factors.
- You would like to be able to present your conclusions or recommendations in a way that is persuasive and actionable, you would like your advice to be implemented.
- You would like to reduce the number of iterations or organizational frictions and you would like to be prepared and well equipped for all devil's advocates who will be challenging your proposal.
- You are the type of person who knows that new ideas or new trainings are useless, until you take action and apply what you have learned.

Who is this session not for?

- You are the person who is extremely uncomfortable trying new things, because you are concerned that it will be rejected or maybe because your organization is very conservative or close-minded.
- You believe that something else needs to change with the industry, economy or other people before you are ready to take new action. You believe that compliance and risk function are meant to be risk-averse and conservative and there is nothing to be improved about the status-quo.
- You will be upset or disappointed if at the end of a value-packed transformative training where someone is going to make you an offer to work with you and help your company even more. It took me years to learn

everything I know today, and I can't compress my 12+ years of knowledge into this presentation. But, what I can do is dive deep into one small area and give you the reasons of why Gap Analysis does not work, and how to apply the Cost-Benefit approach instead, so that you can save your time and gain clarity around where to spend your efforts and how to make your future work more persuasive. And for those of you who want to go deeper and work with me further on other areas, I will give you an opportunity to do so.



2. What are core problems in FinTech Compliance and how do they manifest at the inception of new projects?

Let's dive in. When it comes to getting results in FinTech Compliance most people want to know what to do. I can just tell you to use Cost Benefit Analysis instead of Gap Analysis in 2 seconds. You may understand it conceptually, but with just that "dry advice" most people still won't see the results because they haven't realized the problem is happening because you're doing something that is causing the problem and we need to address it and make you aware so you can stop doing it. Just by stopping you could already see a massive transformation.

For the longest time, we have been told that the role of compliance and risk is to assemble and summarize and present information to senior management about which rules are applicable and how they should be implemented by the company to be compliant. We were told that the business must own their risks and that success of compliance starts and ends with the tone at the top. Compliance officers were led to believe that the only real mistake they could be blamed for is when they did not warn the senior management about some risks, when they did not see the problems coming. If we, as compliance experts, presented all the risks and possible consequences and layed out all the adverse scenarios, and our management did not listen, it's their problem, not ours. Within this framework, the natural incentives and inclinations of compliance officers were to do a thorough research, to prioritize accuracy and to make sure that your lists of risks or rules are as complete as possible, so that you don't miss anything.

The famous Gap Analysis is the ultimate concentration of this outdated approach, because the whole gap analysis exercise is to highlight gaps or things that your company does not have but needs to have in order to become compliant.

There are several problems with this mentality:

• We are not seen as experts and we cause our senior management to be disappointed and annoyed when we ask for things that cannot be easily done, when we delegate the final decision, or when we present our analysis and they view our research as something that is not practical or not actionable.

<u>Pattern interrupt.</u> Just think about it. If a student at school is struggling with algebra,

and does not want to learn and skips lessons, the algebra teacher may go to the school director to get involved and ask to solve the problem with the student, but most likely the school director won't get into the details of how specifically this problem needs to be solved, they are not the subject matter expert. They may need to confirm the disciplinary action, but if the math teacher is expecting the director to go and teach the student, they will likely be seen as unprofessional and incompetent. Many compliance and risk professionals when they delegate too many decisions to the top do not realize that this habit makes them look less capable.

- We ourselves are overworked and overwhelmed trying to be accurate and precise and we know it's not sustainable. If this is the case for you, it may make sense to watch video 1 of the Rise of the Business-Like CCO free series here: https://yana-afanasieva.mykajabi.com/rise of the business like cco
- We are used to demanding a certain course of action or requesting resources using threats and ultimatums such as "We need to fund it because it is required by law" or "We need this because otherwise we will all will go to jail or lose our license" or "Let's have self-identified issues as a part of our audit, because then the management will be forced to fund the remediation plan". Business owners love spending money and funding initiatives that promise to make more money in the future and have a positive ROI. Even when the chance of success is less than 100%! But:
 - Nobody likes paying fees, penalties or taxes that have no benefits. So, it is no surprise that when compliance officers ask for money and position this cost as "necessary evil" or "required by law", nobody likes that.
 - One of the reasons why many compliance officers find it hard to quantify the value of investing into compliance is that they themselves don't actually believe there is a monetary benefit in compliance or they don't believe that others will see compliance as a value-adding function. Finding value in compliance activities isn't trivial. How do you quantify "nothing bad happened"?
 - You may be thinking that growing the business, saving money, improving customer experience is not the job of compliance, it's the job of the sales or engineering or the CEO.
 - You may be thinking that your job is ONLY to make sure that the company follows the law.
 - If your interpretation is that money or growth or customer experience is not your job, this could be one of the fundamental reasons why your opinion is not as valued or why you are excluded from certain decisions or why your recommendations are ignored.

<u>Pattern interrupt:</u>

IN A RELATIONSHIP, IF YOUR PARTNER IS CONSTANTLY TELLING YOU THAT YOU SHOULD NOT BE DOING THINGS, THAT YOU ARE NOT READY, THAT EVERYTHING WILL GO WRONG, THAT YOU ARE IRRESPONSIBLE AND WILL LIKELY END UP IN JAIL... REGARDLESS OF THEIR GOOD INTENTIONS, YOU WILL LIKELY FIND THEM ANNOYING, STOP LISTENING .. AND DO YOUR THINGS ANYWAY, RIGHT?

WHY GAP ANALYSIS DOESN'T WORK AND WHAT IS A BETTER WAY?

So, if you feel you don't want to be stuck in the vicious cycle of ultimatums, compromises, fights for resources and rarely see your recommendations actually implemented, let's summarize some of the key principles of what we have just discovered:

- Negative motivation and ultimatums make it difficult to secure resources.
- The goal of compliance and risk recommendation should not be just accuracy. The goal is to develop a plan of action that is implemented and adds value to the company.
- It is important to include into any compliance proposal not just the requirements and cost of what is needed and the list of everything that can go wrong, but also the benefits of what becomes possible once this is done.

What do you think will happen once this pattern is fixed?

When I work with my clients and students, it is very apparent that both, compliance and business, have their instinctive biases.

The priority list of your business leaders probably looks like this:

- let's get more customers and more revenues first,
- try to control and optimize costs,
- we can now afford to think about how to keep our house in order.

The compliance priorities will likely have a very different order:

- let's fix all past errors and gaps,
- then we can carefully study and research new opportunities,
- only once we are feeling secure about the past and present, can we add and handle new risks.

If these biases are not reconciled, any new project within your FinTech company is doomed, because it is bound to repeat all the legacy issues and past mistakes.

Does it make sense now? Do you perhaps see how your past actions were not optimal?

So, let's look at how we will do things differently by removing the Gap Analysis and introducing the Cost-Benefit analysis instead.

Let me show you how.



3. Cost-Benefit Approach: 5 Steps Approach

Step 1. Identify and quantify the benefits of the new project and its timing.

- For example: a launch of a new product will bring us 1000 new customers and \$100,000 in revenues during the first 12 months. Finance or sales teams will be able to provide this information. If not, agree with them on some basic assumptions. Don't judge how realistic it is for this purpose, simply get an understanding of why your company wants to start this project. It puts things into perspective.
- Your future compliance requirements should never cost more than 10% of the total future revenues.
- Your engineering team will have a view about when this project can go live technically.
- If there is a new partner involved, your partnership or BD team will have a view, how long it will take to launch this partnership.

If you skip this step you will never know if your recommendation makes sense. You will never know if you are killing the business or enabling it.

Step 2. Define or propose the trial (beta) environment for this new project. Let's call it "Day One".

Every new project must have a testing phase or a trial period. Define or propose the scope of the testing phase. This period will normally be used to see if the project is viable. Usually the trial version of the product is simpler, the scope of customers is limited to "friends and family", the timing of the trial period is sometimes limited.

The purpose of the trial phase is:

- Discover if the project is actually viable (will the customers like it, will the demand be there, will the assumptions and expectations come to fruition).
- What does the success of the testing phase look like? How many customers will need to sign up, how many transactions or revenues will need to be generated during the first 1-2-3 months?
- What is the minimum threshold that needs to be met for the company to decide that the project will be scaled and will receive additional funding?

If you skip this step you will spend 80% of your time preparing for a project that may never go live. Negotiate the parameters of the trial phase before you start ANY research.

Example: Geo-Expansion of Existing Product into New Markets

- 1. Which countries will be targeted first and why?
 - 2 options:
 - have a plan and launch new countries one-by-one, especially where it is linked to physical activities on the ground, such as shipping cards, opening support a center, engaging sales teams, localizing website.
 - Open all countries and see who comes up and then decide what resources do you need, who to hire, what are expected volumes, etc.
 - Ideally sequencing of countries should be based on objective metrics, e.g. size of the country, app downloads from that country, number of signups/waitlist/social media followers...?
- 2. Practical aspects to consider when you open a new country:
 - Is language support needed (both to answer CS questions, but also to be able to read and understand POAs and corporate documents)
 - Are there specific documents that are either acceptable or not acceptable from that country and if so, do you need to publish FAQ for the users (e.g. do you accept domestic passports, or is stamp in the passport accepted as a POA, do you accept driver's licenses without security features, which documents your KYC vendor can read...) Ideally, you have a list of acceptable documents from your KYC vendor.
 - Are there any specific known concerns around compliance in that country (e.g. exclude Americans or Chinese, exclude certain tokens, AMEX card cannot be used for gambling or forex trading...) - do not try to research new problems, just extrapolate what you already know.
 - Flow of funds. How people are going to send you funds from that country or in a local currency, means to top-up and withdraw money.
 - Your bank or credit card processor may have a list of prohibited countries. You may also not have this list, but they suddenly are alerted by higher volume transactions from certain countries.

- Sometimes for cards-in there are limitations from card processor on where the card will not work, for example, it is possible that EU issued card won't work if the user is physically in China on business trip trying to buy crypto.
- Update T&Cs

3. Compliance requirements and KYC processes

- It is better to start with a semi-silent soft launch (without marketing, invitation only style) to uncover the issues and see what types of documents, questions and friction points come up and how long it may take to fix them. Then based on the learnings, FAQ is published and you set expectations with customers on the types of the documents accepted and what needs to be translated, details of pricing, currency conversion, format of the address, format of the ID documents numbers, etc.
- Compliance review of all customer-facing messages needs to be very careful, so that you don't appear to be directly targeting specific markets. It is "safer" to make it look like you don't specifically target retail/individual users and focus communications on "international businesses with presence in countries such as" local authorities are always more concerned about consumers than businesses or traders.

4. Communicating with authorities

- Position geo-expansion as ancillary activity/ testing phase first.
- Possible propose a list of 3-4-5 countries and prepare a brief overview of why these countries are low AML risk and easy to maintain.
- Potentially state that due to higher AML risks, certain services are not available to new customers or they have lower transaction limits.
- Promise that there will be no aggressive campaigns and it's more like a passive acceptance and testing of the interest from the new markets (and act accordingly)
- Offer financial projections indicating that those volumes are likely going to contribute under 1-2% of the total volumes.

Step 3. Define the compliance and risk parameters for the testing phase of the project.

Chances are, in 80% of the cases the project will either fail or will be changed dramatically, therefore it makes no sense to prepare the full regulatory analysis and list of gaps for a project that is not likely to ever succeed.

Therefore, propose to your management team that you will only prepare a small list of requirements for the testing phase.

Since the scope and the timing and the number of customers of the testing phase is limited, there is a good chance that there is no need to worry about the vast majority of new risks or compliance requirements.

What you REALLY need to determine and define in terms of risks and compliance is the following:

- An update to the T&C (where your customers are informed that they are participating in the testing phase and agree not to complain, you may also ask them to provide you feedback). This is how you address possible customer complaints issues. If the new pricing or other conditions are involved, add them here. Define that the testing environment can be terminated or changed at the discretion of the company.
- Define which customers are qualified to join the testing group (their initial deposit, country of residence, tenure with the company, legal form, etc) and collect evidence that they meet the criteria.
- Inform your regulator that this testing will be conducted and describe the scope of the testing phase. Highlight that this is a limited time limited scope testing and as a result your risks are limited.

Estimate the cost of getting ready for the beta (direct costs related to supporting this trial phase, do not allocate overhead costs to this project).

At this stage, you have to deliberately compare apples and oranges: you will compare the cost of compliance for the beta with the total potential revenues of the project during the first 12 months. I recommend that you do not exceed 10% at this stage (because there will be technical costs and marketing costs and other indirect costs of management time spent on the project). Try to come up with a simple way of supporting a few customers during the testing phase, DO NOT TRY TO SOLVE FOR ALL POSSIBLE FUTURE RISKS.

Step 4. Estimate the costs and time needed. Compare the Cost and the Benefit.

The modern compliance function is a profit center, not a cost-center, because the vast majority of compliance decisions impact revenues. Compliance is not different from any other function and your success and results must be measured in the same way as they are measured for any other function: making money for the company or saving money (time or other resources) for the company.

Return on investment (ROI) is a measure of the profitability of an investment. It is calculated by dividing the net profit of an investment by the cost of the investment.

To apply ROI to FinTech compliance project assessment, we can use the following steps:

- Calculate the costs of the compliance project. This includes the cost of consultants, software, direct payroll and other resources involved.
- Estimate the benefits of the project. You will get this info at Step 1.
- Compare the cost of the compliance efforts needed and the benefits projected at Step 1.

Here are some additional things to consider when applying Cost-Benefit (or ROI method) to FinTech project assessment:

- The risks or uncertainties associated with the project (e.g. how likely the revenues are, are there any additional costs, potentially, related to fraud or disputes)
- The indirect benefits of the project, such as once we have a new customer, can they use a different service or refer another customer.
- Consider the time value of money if this is a very long-term initiative or high-inflation country.
- Track the ROI of the project over time to see how it changes as compared to the initial assumptions.
- Compare ROIs of different initiatives to make future business decisions (e.g. invest into more tools or add more people).

What about the RISKS???? If we only manage compliance departments based on the revenue objectives, who is going to consider risk implications?

• If there are some quantifiable risks (new fraud, disputes, possible legal

issues), you can include the cost of mitigation of this issue into the formula (adjusted for probability of this happening).

- I do not recommend making any adjustments for "reputational risks" or abstract regulatory issues or "customer trust" issues people never get it right.
- I have seen customers not losing trust even when the company has had multiple publicly known issues for years (Binance) and walking away from decent services that never had any bad publicity. It does not mean these factors are not real. It means that our ability to assess and quantify these factors is so bad that it's better to ignore it until and unless it actually happens.

What about the time after beta testing?

Once this is complete, you will repeat the process and update your requirements, but with a lot more clarity and data. Some preparatory work will have already been done and tested by then

Step 5. Self-check.

If today was your last day on this job and you were leaving this company and you honestly wished them well and wanted to make the best possible decision to help them, what would you decide then?



4. Recap and Next Steps

Alright! Hopefully the path to easier and more persuasive ways of presenting compliance recommendations for new FinTech Projects has become clearer for you. This is what I call "Just-in-Time" (as opposed to Just-in-Case) principles of doing compliance.

You know the principles and you understand how the process will look like. But at the same time, if you are any of my clients and students you probably still have questions. For example:

- How do I simplify the requirements for onboarding of new customers?
- How do I research new geography and its requirements and cross-border risks?
- How do I incorporate the requirements that may be imposed by our financial partners?
- Do I need to update our risk assessment and when?
- What if auditors ask questions?

I hear you. Compliance never operates in a vacuum. And what these questions above are really all about is how to break down and simplify many other compliance dependencies and policies and processes that touch every new and old project.

You may feel like this one simplification is great, but there are so many other issues with business requests and unrealistic expectations of your peers, and past issues that are not fixed, and the fact that you may be working very long hours with your to-do list never ending... Right?

So,

- If you are a FinTech startup CEO, you may be
 - struggling to allocate limited resources between marketing, regulatory consultants, or hiring more engineers...and you feel you are the only one who can push back or fight with your compliance team because they are too conservative and prefer to say "no"...
 - unable to focus on growing your business because you are constantly writing long explanations to your regulators, auditors, bankers, and

other financial partners who continuously threaten to shut you down or cut you off... and you don't know how would anyone ever be able to satisfy their demands...

- If your compliance is getting more expensive and slower by the day and you simply cannot afford to hire more people to do what needs to be done...
- If you don't know which regulatory risks are real and should be avoided and which ones are imaginary and can be tolerated... you have finally come to the right place, keep reading!

... or...

- If you are a FinTech Compliance leader, CCO or MLRO and
 - $\circ\;$ you and your team work very long hours, constantly struggling to secure resources;
 - you prepare very detailed, well researched reports, gap analysis summaries or risk assessments, but very few of your recommendations get implemented;
 - feel unappreciated and often excluded from important business decisions until the very last minute...

If you would like to learn to

- See simplification opportunities and ways to achieve progress, speed and scale in all compliance areas;
- Work less, have fewer meaningless iterations, see your ideas implemented and receive appreciation for what you do;
- Have confidence that you are fully equipped to set up, track and manage all key compliance processes, such as license applications, audits, risk assessments, client onboarding, white labeling, partner due diligence (and more) ... without worrying about whether your inputs will ever be appreciated and without constant fighting for resources and your management time...

I am offering to completely shift how you see compliance and what is possible to achieve for you within your company at the current level of resources you have ... in the next 60 days or less!

You can absolutely do this on your own, because you already have access to the Rise of the Business-Like CCO free training series, where all principles of Just-In-Time Compliance are presented and outlined. Obviously you will need to spend a few months your own drafting new communications, testing new strategies, trying our new communication techniques... You will be making progress if you are deliberate and consistent, but it will be slow and and costly for you and your company...

Or

You can jump-start this process, get instant access to multiple resources and trainings, and start taking new actions while being coached and directed by someone who has successfully done it over and over with fast and consistent results. Skip the wasted time. Take advantage of the **FinTech Compliance Self-Starter**.

This program offers you step-by-step guidance on how to set up and manage all essential aspects of your FinTech Compliance program – efficiently and on a budget!

Whether you are a compliance expert or a founder handling your company's compliance, the worst possible mistake in compliance is starting from scratch! Stop reinventing policies, processes, or documentation for partners – we've got you covered!



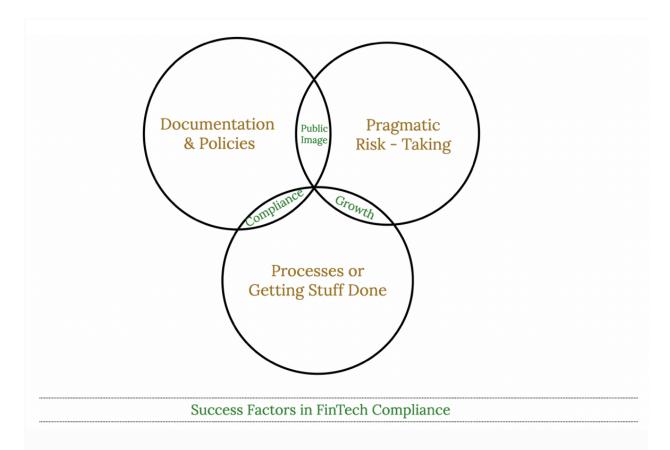


You are likely to experience the following outcomes during the first 60 days:

- You will know how to confidently present your proposals and budget requests and get them approved.
- Your professional reputation will shift from "business-friendly" (aka "easy to manipulate") to respectable and equal.
- You will have a blueprint for interactions with auditors, regulators, banks or financial partners.
- You will have a strategy on how to simplify any risk assessments you do for the company and how to take more risks where needed.
- You will have an option to get officially certified (for you or one of your team members) as a FinTech Startups Compliance Pro (CPD assessed).

How is this program different from any other compliance training? "Just-in-Time" principles is a foundation of agile, scalable and results-oriented compliance based on 3 pillars:

- Documentation and policies
- Pragmatic risk acceptance
- Operational efficiency



Why these 3 components are so essential?

- Pragmatic risk acceptance combined with efficient processes will create growth and scale.
- But... without documentation and policies, you will experience an "undocumented growth" which is a problem, when it comes to securing important partnerships and licenses.
- Efficient processes combined with documentation will equal compliance because you do what your policies say, but without risk-taking, you end up being a conservative, rigid old-fashioned bank.
- Risk-taking combined with great documentation will create a great public image, but if you don't actually do what your policies say, it is window-dressing, and you'll get caught.

How does it work?

1. Defining the rules you will follow – documentation and policies. Regulatory and other approvals are often secured by preparing disclosures, reports, and policies. Our tried-and-tested templates are continuously fine-tuned and

updated, based on feedback received from our clients. Our templates will save you time and resources previously spent on reinventing the wheel and starting from scratch with a blank page syndrome! Remember, the purpose of your compliance policies is not only to define what to do but (more so) to be used as an illustration of why and how your startup is credible and trustworthy.

- 2. Pragmatic risk acceptance. Risk management and risk acceptance are fancy words for good judgment and efficient decision-making. This aspect of implementing just-in-time compliance is the hardest to train and the slowest to change, it requires a shift in perspective. Successful business-like CCOs and compliance leaders think very differently about risks, uncertainties, success, and decision-making. They manage compliance function as a profit center, not a cost center, in terms of ROI and probabilities rather than asking for and appropriating budgets with minimal accountability.
- 3. Just-In-Time Processes. A big part of compliance contribution to the business is implementing efficient processes around onboarding and transaction monitoring, opening bank accounts, securing licenses and partnerships, opening new geographies, responding to regulators, drafting various reports, and managing ongoing inspections and audits. These processes need to be streamlined and simplified, otherwise, your compliance team will be spending too much time on documentation and not enough time reviewing new projects, new clients, and assessing new opportunities. With license applications and planning your partnerships, structuring white-label solutions, or accepting international customers into your current entity you need to learn how to allocate your resources wisely because there will be waiting times, delays, and rejections. Not everything needs to be ready right away and not everyone needs to be hired at once, otherwise, you will run out of money! A dozen implementation workshops on all critical aspects of compliance operations are included in the Compliance That Makes Sense packages.

BONUS: FINTECH STARTUP COMPLIANCE PRO CERTIFICATION

This program allows you (or one of your team members) to complete our very unique FinTech Compliance certification that will prepare you to handle the most common compliance challenges and will elevate your competence and confidence to the next level where you feel ready not only to set and manage a superb compliance program within your FinTech startup, but will have a framework for making pragmatic risk-based decisions.

In addition to the pre-recorded curriculum, workshops, and instant access to all templates, you will have access to additional training and coaching focused on the most relevant and complex FinTech compliance performance and leadership topics.

The Certification Schedule for 2024

3 cohorts are currently planned for 2024:

- Starting on January 20 and graduating by April 15.
- Starting on April 15 and graduating by August 15.
- Starting on September 16 and graduating by December 16.

If you would like to obtain the official certification as a "Certified Startup FinTech Compliance Pro", you will be asked to prepare your case study project, which will be assessed and graded. The final assignment is where you will have to identify, prepare, and justify a case study about where your function or company should take more risks.

Certification Benefits: depending on your company's policies, an official certification status of the program can potentially help you claim the cost reimbursement and/or additional study leave or time-off as well as the documented proof of the 30 hours invested into continuous education.

Pre-recorded and instantly available project management workshops and accompanying project planning guides:

- Rise of the Business-Like CCO training.
- Opening bank account and preparing for banking due diligence roadmap

- FinTech Licensing workshop and licensing planning roadmap
- FinTech Risk Assessment workshop
- Structuring White-Label Solutions in FinTech
- Onboarding of corporate customers workshop
- Creating your FinTech Privacy Policy and GDPR Compliance
- Preparing for and managing FinTech AML and operational audits
- Annual compliance reporting requirements for FinTech workshop (all mandatory reports templates included)
- Documenting your Outsourcing workshop
- Compliance Performance and Resource Management
- End-to-end Crypto Compliance Workshop (including a separate dedicated training on how to comply with Apple and Appstore Guidelines)
- FATCA and CRM implementation for FinTech

... plus new content and templates are added regularly!

ADDITIONAL BONUS CONTENT:

- FinTech Compliance for Beginners module (or a refresher if you are new in FinTech but not new in compliance)
- Calls Archive with dozens of compliance implementation questions answered!

How much is the investment?

This is an important investment, and the great news, it has an **ROI of over 3000 %** over the next 12 months!!!

- You can reduce your annual audit costs and audit issues remediation costs by **25,000 EUR** when your documentation is solid and well structured and you know how to handle the audit as if it is an emergency.
- You will be accelerating your time to market by receiving faster sign-offs or approvals from partners or regulators, and avoid over-investing too soon into hiring and marketing, which can save you at least **25,000 EUR** a month!
- You won't need to pay for additional consultancy, training, or seminars/webinars: another **20,000 EUR** a year savings opportunity!
- You will not be overpaying for compliance tools and tech features within these tools that you don't need it can generate additional savings of up to **50,000 EUR** a year and will also save you a payroll of at least one additional

analyst.

Compared to these savings and benefits of at least **120,000 EUR**, an investment into the FinTech Self-Starter is a smart move!

You can delay this decision, as some short-term thinkers do, but a few months later, they usually find themselves having to pay much more for audit findings remediation, urgent consultancy, and other unnecessary and entirely avoidable costs.



THE DOORS ARE OPEN FOR YOU!

I have helped dozens of FinTech companies get licensed, expand into new geographies and launch new products. Now – it's your turn!

My consulting clients pay me anywhere from 100k to 300k EUR a year to work with me. My templates are tested by dozens of FinTech professionals and hundreds of participants have joined my workshops and shared raving reviews. I appreciate how valuable my time and expertise are because I know how to get results for my clients.

But over the last few years, I noticed that a lot of regulatory issues could have been avoided and time and money wouldn't be wasted, only if I had been able to meet with these teams sooner and share what I know.

• So many FinTech startups spend months and months, struggling to build their compliance documentation from scratch, googling and copying random

policies and contracts from the internet, or hiring expensive lawyers to draft documents that nobody from the company can read or understand.

- Many FinTech founders grow increasingly frustrated about compliance, they view compliance as a terrible monster hydra and a necessary evil.
- They believe that it's hard or impossible to find the right compliance people or that they themselves could do compliance better than anyone else by doing their own research and benchmarking everyone.
- They sometimes tell me that they want to be compliant, but find it to be an elusive target, where no matter how much they invest, it's never enough, and it takes forever to get anything approved, nobody could answer their questions about what is the real risk of not doing certain things or why their competitor was able to get away with so little compliance efforts.
- This institutional legacy and old-fashion compliance traditions keeps many compliance officers stuck and unable to think outside of the box.
- Many of these startups will never make it to the level where they want to be and run out of funding.

FinTech Compliance Self-Starter is the first and potentially the only REAL SOLUTION designed by the compliance expert to empower FinTech founders and teams to build and grow their compliance based on agile "just in time" principles and using a pragmatic risk acceptance approach.

Compliance That Makes Sense cannot be learned at regulatory seminars or from reading laws and circulars. It comes from the practice of working with agile dynamic FinTechs, just like yours, who are pressed for time and have a limited budget.

My ultimate goal is to elevate the prestige and reputation of compliance as a function by helping as many startups as I can, training and empowering their teams, and showing what's possible to achieve with "just in time" compliance and how affordable it can be.

I will give you the practical tools and resources to reduce the workload of your existing team so that they become more efficient and confident because they no longer need to build everything from scratch and can leverage the case studies of others.

So, tell me - are you still in?

At this point, you may be asking yourself if you should continue figuring things out on your own or not. This is actually the wrong question to ask because every successful entrepreneur and business owner will tell you that they got where they are because they had mentors, external advisers, and support from more experienced people.

So the more powerful question you should be asking is WHO can support you and WHERE you can find help and continued guidance.

And as you already know, if you choose nothing... then nothing changes. You can obviously keep the status quo blindly pouring more time and money into compliance without much hope of creating different results or reversing existing inefficiencies... But why would you put yourself into this position, pursuing a broken strategy, draining your resources, and creating more and more organizational conflicts?

Right now you have to make a commitment to building a compliance function that makes sense to you and your business and from now on you can take just one step and one decision at a time to keep making progress.

So -

- Are you going to continue to be a person complaining about confusing compliance requirements, unreasonable auditors, or some other uncertain circumstances or will you take responsibility for being a leader and problem solver?
- Are you a person who sees obstacles or opportunities? More specifically, will you be a forward-looking visionary leader who sees how agile compliance can be a massive competitive advantage for your business?
- Are you a business owner or an executive who waits for the perfect time or an action taker who knows when enough excuses are enough excuses, and it's time to move ahead even when you don't have all the answers?

Well, if you are a smart action-taker and ready to commit, simply click the button below and I will be waiting for you on the inside. Let's do it! $\Re \Re \Re$