AMMODUS

FINANCIAL SERVICES GOVERNANCE BRIEFING

Governed systems your firm can stand behind.

How Ammodus turns automation and intelligent capabilities into proportionate controls, meaningful human oversight and evidence a regulated firm can inspect.

UK financial services | Version 1.3 | Reviewed 1 August 2026

OUR OPERATING POSITION

01 **PROPORTIONATE**

Control depth follows consequence.

02 **HUMAN-LED**

People retain authority over material outcomes.

03 **EVIDENCE-READY**

Decisions, tests and changes remain inspectable.

Control depth follows consequence.

A regulated firm should be able to see why a system exists, who owns it, what data it uses, how people intervene and what happens when it fails.

CONSEQUENCE-BASED POSTURE

01 **Assistive**
Internal search, summaries and first drafts.

02 **Controlled**
Customer communications, triage and recommendations.

03 **High consequence**
Advice, eligibility, pricing, vulnerability, complaints or financial crime.

04 **Stop**
No lawful basis, accountable owner, reliable controls or acceptable customer outcome.

Governance and accountability

Named owners, approval gates, senior reporting and a clear route to stop or redesign the system.

Data and privacy

Lawful use, minimisation, quality, lineage, retention, transparency and sensitive-data boundaries.

Resilience and third parties

Dependency mapping, vendor assurance, monitoring, incidents, fallback, recovery and exit planning.

Use the least complex technology that safely achieves the outcome.

DELIVERY MODEL | CONTROLLED FROM IDEA TO OPERATION

Governance is built into delivery, not added after launch.

Each stage has an owner, a decision and evidence the client can inspect.

1

Frame the system

Define purpose, people affected, regulatory perimeter, data, autonomy, dependencies and credible failure modes.

2

Prove the controls

Test realistic quality, fairness, privacy, security, resilience and customer-outcome scenarios before release.

3

Assure operation

Monitor outcomes and change, manage incidents, reapprove material updates and retain a safe fallback.

EVIDENCE PRODUCED

Systems register | Data and privacy record | Control and approval record | Evaluation report | Security and resilience pack | Ongoing assurance

Control stays visible at every decision point.

The operating model should make accountability clearer, not hide regulated work inside a black box.

✓ **Named accountability**

Every system has an owner, approval route and proportionate senior oversight.

✓ **Meaningful human review**

People have the context, competence and authority to challenge, override or stop outcomes.

✓ **Lawful, bounded data**

Purpose, access, minimisation, retention and rights handling are agreed before use.

✓ **Traceable evidence**

Sources, tests, decisions, limitations and approvals remain linked and inspectable.

✓ **Resilient fallback**

Failures, incidents and supplier disruption have tested recovery and safe manual routes.

✓ **Controlled change**

Material updates trigger evaluation, approval and a visible version history.

REGULATORY TRACEABILITY

FCA / SYSC / SMCR | **Consumer Duty** | **UK GDPR / DUAA** | **Operational resilience** | **NCSC secure development**