

3THINGS

YOU MAY NOT KNOW ABOUT ME...

1. I started my career wanting to be an entertainment lawyer and somehow ended up as a CCO.
2. I have a photographic memory for faces; I recognize people out of crowds almost instantaneously.
3. In my free time, I'm a visual artist. I've dabbled in airbrushing, jewelry making, pottery and painting.



BEN GRAY

Global Chief Compliance Officer

Square



Should your compensation be determined by location / cost of living?

Yes

51%

No

40%

Yes if working 100% remotely

9%

Q&A

THE SECRET SAUCE OF COMPLIANCE

What is your secret sauce for compliance?

Taking it back to the basics every time. I'm a big believer in laying out the facts and making sure we're grounding our decisions in the actual risk presented, not our biases or past lived experiences. Every time we make a new call, whether it's a new product launch, a new set of tools, or just a different approach to our risk tolerance, we always go back to the fundamentals.

What are the risks we're seeing, what are our legal and regulatory obligations, and are we being thoughtful about the program we're building? Going through the analysis each time unlocks creativity and innovation. It also helps us to build trust and credibility with our product partners, because we're able to bring them along in our thought processes.

What is one thing you changed that has made a big difference to compliance culture at Square?

One message I've focused on driving home is that compliance is a competitive advantage, not a barrier to progress. To cement this thinking, we've built a compliance organization that is deeply integrated with the product organizations. Compliance team members are treated as partners who protect the company and its shareholders and as folks with valuable perspectives that allow us to grow and expand our product suite.

What do CCOs need more of?

Technical resources like engineers, data scientists, machine learning modelers, and data analysts. Successful compliance in modern financial services is almost entirely a function of the tools and models a program can deploy. The only way for CCOs to keep up with the speed and scale of modern financial services offerings is to deploy bleeding edge technology.

What is your involvement in addressing diversity at Square?

Diversity is a huge priority to me. I'm very proud of the compliance organization we've built, and we've assembled our diverse and talented team through concerted effort and focus. We have internal hiring programs that ensure that we are considering a diverse slate of candidates for each role we open, and I work directly with my recruiting partners to ensure that building diverse pipelines is a top priority in the roles we're filling.

As a result of these efforts, the Square compliance team is one of the most diverse teams within the entire company.

Interview by Steve Harrison, Partner at Conselium Compliance Search

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How do you make sure that compliance stays relevant at Square?

I'm lucky that at my company, there is broad recognition of the relevance and importance of compliance. At the same time, you need to put in constant effort to highlight the wins. Every time compliance plays a role in avoiding a regulatory risk, helping to launch a new product, enabling growth, cutting costs, or generally achieving something positive, I look for avenues to highlight that achievement publicly.

JD or not JD, that is the question

I have a JD, but I don't think one is necessary to be a strong compliance professional. To be successful in compliance you must be willing to dive deeply into regulation to assess and mitigate risk, which you can do without a JD. Certainly, some of the JD skills are transferrable, but they're not required. To me compliance is a career path and not a stepping stone.

What would you say to someone considering a career in compliance?

It's an exciting time to go into compliance! Compliance is going through a period of rapid growth and transition. As new products like cryptocurrency and decentralized finance emerge, regulators and compliance professionals must rethink their entire modes of operation. If you step into compliance now, you'll get to work on new and exciting projects that contribute to the future of financial services. Be open to different opportunities as they come, because you never know where the compliance path will take you!

How do you keep your hair from bursting into flames each day?

I have an incredible team of colleagues. I could never do my job without their support and leadership. We work together to prioritize the biggest issues each day, and we make sure that I'm focused where I need to be focused. I exercise in the morning and when the day is done, I take a long walk with my dogs and my partner to relieve stress. Routine is good for me.

Why did the Compliance Officer cross the road?

The risk presented was simply too great to stay on her current path.

PEOPLE ARE TALKING



We took a chance on Conselium and do not regret it!

- Chief Compliance Officer - Broker Dealer



"Conselium found us a wonderful new Chief Compliance Officer"

- CEO - Healthcare



"After several months without luck internally, Conselium found us the right candidate"

- Director of Compliance - Pharmaceuticals

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