## Conduct Rules Scenarios The 'Superstar' Bully

## **Scenario**

Greg Johnson is head of equities trading at Toploader Asset Management Ltd. Greg is not a Senior Manager, but has been classified as a "Material Risk Taker".

The Human Resources department of Toploader has received a number of complaints from members of Greg's team about Greg's behaviour. Initial informal investigations would suggest that there is substance to the various claims.

Greg's seems to have promoted a culture of intimidation and bullying, with a focus on nothing other than long hours and "the bottom line". Greg maintains that this is simply part of the process of "toughening up" the team, many of whom he regards as "snowflakes".

A formal investigation into the matter is initiated, but Greg leaves before the investigation and any related disciplinary hearing can be completed.

What conduct rules may have been breached? Why? How should the firm respond? What controls could have been implemented?