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Grand Bank for Savings, FSB | Member FDIC

Fair and Responsible Banking Officer

Job Summary: The Fair and Responsible Banking Officer serves as Grand Bank for Savings, FSB (“Grand Bank” or the “Bank”) subject matter expert responsible for the design, implementation, and oversight of the Bank’s Fair Lending and Unfair, Deceptive, or Abusive Acts or Practices (UDAAP) compliance program across all products, delivery channels, and customer touchpoints, including digital banking platforms and the Bank’s national credit card program. This position will lead a team of compliance professionals and has direct interaction with senior leadership and Board-level committees.

Essential Duties and Responsibilities

The essential functions include, but are not limited to the following:

Fair Banking Program Oversight:

- Develop, implement, and maintain an effective second line Fair and Responsible Banking (Fair Lending and UDAAP) compliance program across all Bank products and services
- Establish and maintain fair banking risk governance standards, including alignment with the Bank’s risk appetite and escalation frameworks
- Provide independent review, challenge, and oversight of business line activities to ensure fair treatment of customers and compliance with applicable regulations
- Conduct enterprise-wide fair banking risk assessments, incorporating deposit, digital banking, ACH/payment flows, and credit card products
- Coordinate with the CRA Officer to ensure alignment between fair banking risk assessments and CRA program objectives, including equitable access to credit and services across designated assessment areas

Digital Banking, ACH, and Payments Oversight:

- Provide oversight of fair banking risks within digital banking platforms, including account origination, servicing, disclosures, and customer experience
- Review and challenge ACH and payment-related practices for compliance with NACHA rules, Regulation E, and UDAAP expectations
- Monitor customer journeys across digital channels to identify potential disparate treatment or unfair, deceptive, or abusive practices
- Partner with operations and technology teams to ensure fair and compliant design of automated decisioning, workflows, and customer communications
- Monitor and manage the bank's overdraft program to ensure compliance with applicable regulations, internal policies, and fair lending principles,

including periodic review of program parameters, fee structures, and customer impact metrics
- Review automated decisioning models, algorithms, and credit policies for fair lending and UDAAP risk
- Monitor developments in consumer financial data rights, including obligations under Section 1033 of the Dodd-Frank Act and emerging open banking frameworks, for fair banking and UDAAP implications related to third-party data access and customer-permissioned sharing
- Provide oversight of error resolution processes (including ACH disputes and unauthorized transactions) to ensure consistent and fair customer outcomes

Credit Card Program Governance:
- Provide fair lending and UDAAP oversight for the Bank's national credit card program, including underwriting, line assignment, credit line management, pricing, fees, marketing, and servicing practices
- Review credit card disclosures, marketing materials, and lifecycle communications for compliance with Regulation Z, UDAAP, and card network expectations
- Analyze credit card portfolio performance, including approvals/denials, line management, fees, and customer outcomes for potential disparate impact or unfair practices
- Support oversight of third-party processors, issuing platforms, and marketing partners to ensure alignment with fair banking requirements
- Oversee credit card marketing, prescreen, and solicitation practices for compliance with fair lending and UDAAP expectations
- Provide oversight of credit card collections, hardship programs, and loss mitigation strategies for fair lending and UDAAP risk

Monitoring, Testing, and Analytics:
- Perform ongoing monitoring, testing, and analytics to detect fair lending and UDAAP risks across products and channels
- Coordinate with the Model Risk Management (MRM) function to ensure fair lending risk is incorporated into every credit-decisioning model validation, including underwriting scorecards, risk-based pricing engines, and automated credit line increase models.
- Conduct comparative file reviews, matched pair analysis, and peer benchmarking
- Oversee complaint monitoring, categorization, and root cause analysis across all channels, ensuring timely identification, escalation, and remediation of systemic issues and potential UDAAP concerns
- Support HMDA data integrity, analysis, and reporting, including preparation of management-level insights and recommendations
- Support implementation and ongoing compliance with small business lending data collection requirements under ECOA Section 1071, including

oversight of data integrity, reporting, and fair lending analysis of small business credit activity
- Develop and maintain data-driven monitoring frameworks, dashboards, and key risk indicators (KRIs) to proactively identify fair banking risk trends

Advisory and Business Line Support:
- Serve as a trusted advisor to business lines on new products, initiatives, and strategic changes, ensuring fair banking risks are identified and mitigated early
- Review and approve marketing materials, customer communications, and product changes for fair lending and UDAAP compliance
- Provide guidance on remediation strategies for identified risks, including corrective action plans

Governance, Training, and Reporting:
- Develop and deliver fair banking training tailored to business lines, including digital, payments, and credit card teams
- Provide fair banking oversight of third-party relationships, including fintech partners, marketing firms, digital platform providers, and payment processors
- Prepare clear, concise reporting for senior management and Board committees on fair banking risks, trends, and program effectiveness
- Assist in regulatory examinations and audits, including coordination of requests, responses, and remediation efforts
- Maintain current knowledge of regulatory developments, enforcement actions, and industry best practices

Minimum Qualifications (Knowledge, Skills, and Abilities):
- Bachelor’s degree or equivalent experience
- 7+ years of progressive experience in fair banking compliance, fair lending, or CRA, with at least 3 years in a leadership or officer-level role.
- Experience working in or alongside a second line of defense risk management or compliance function
- Experience launching or supporting a national credit card program
- Prior interaction with OCC or FDIC examinations; familiarity with CFPB rulemaking, enforcement actions, and supervisory priorities
- Demonstrated experience with digital banking platforms, ACH/NACHA rules, and/or payments ecosystems
- Experience supporting or overseeing credit card programs, including knowledge of Regulation Z and card lifecycle processes
- Strong knowledge of Fair Lending laws (ECOA/Reg B, HMDA), UDAAP, Regulation E, and applicable regulatory guidance

- Familiarity with MRM frameworks (SR 11-7 or OCC equivalent), including documentation and governance expectations for automated decisioning models used in credit and customer management
- Experience with statistical fair lending testing methodologies (regression analysis, matched-pair analysis, marginal effects analysis)
- CRCM strongly preferred; candidates without the designation should have a clear path to certification or a comparable advanced compliance credential (e.g., CAMS, CCEP)
- Strong analytical skills, including ability to interpret data, identify trends, and assess risk across multiple products and channels
- Excellent written and verbal communication skills, with the ability to present complex topics to leadership
- Proven ability to operate independently, manage multiple priorities, and influence cross-functional stakeholders
- High level of integrity, professionalism, and attention to detail

Physical Demands and Work Environment: The physical demands described here are representative of those that must be met by an employee to successfully perform the essential functions of this position. Reasonable accommodations may be made to enable individuals with disabilities to perform the functions.

While performing the duties of this position, the employee is regularly required to speak or hear. The employee frequently is required to use hands or fingers, handle or feel objects, tools, or controls. The employee is occasionally required to stand, walk, sit, and reach with hands and arms. The employee must occasionally lift and/or move up to 25 pounds. Specific vision abilities required by this position include close vision, distance vision, and the ability to adjust focus. The noise level in the work environment is usually low to moderate.

Note: This job description in no way states or implies that these are the only duties to be performed by the employee(s) incumbent in this position. Employees will be required to follow any other job-related instructions and

to perform any other job-related duties requested by any person authorized to give instructions or assignments. All duties and responsibilities are essential functions and requirements and are subject to possible modification to reasonably accommodate individuals with disabilities. To perform this job successfully, the incumbents will possess the skills, aptitudes, and abilities to perform each duty proficiently. Some requirements may exclude individuals who pose a direct threat or significant risk to the health or safety of themselves or others. The requirements listed in this document are the minimum levels of knowledge, skills, or abilities. This document does not create an employment contract, implied or otherwise, other than an “at will” relationship.

Grand Bank offers a competitive salary along with the following benefits:

- 401(k) and Profit Sharing
- Health Insurance
- Dental Coverage Plan
- Vision Coverage Plan
- Disability Insurance
- Life Insurance
- Paid Time Off
- Community Service PTO Match (Bank approved)
- Tuition Reimbursement
- Incentive Eligible

Job Type: Full-time

Location: Wilmington, DE or Hattiesburg, MS

Pay: Based on education and experience. Salary plus eligibility for leadership bonus.

ABOUT GRAND BANK FOR SAVINGS, FSB: Grand Bank is exploding with growth and on the fast track to becoming a leader in providing affordable, innovative financial products to our customers throughout the U.S. Our mission is to deliver cost-effective financial tools to give our customers better ways to borrow, spend, and save. We thrive on creating solutions to help our customers live healthier financial lives and improve their relationship with money. From saving for retirement to buying their first home, whatever stage of life they are in, we are with them every step of the way.

Chartered in 1968, Grand Bank has a rich history of thinking out of the box to offer unique products to meet the needs of our customers. We value our team members and all they bring to the table. If you’re enthusiastic about delivering customer-focused solutions with a digital edge to help others build solid financial health, you want to work for us. You’ll discover a career full of excitement, challenge, purpose, and opportunity at Grand Bank. We are proud to be an equal opportunity workplace dedicated to pursuing and hiring a diverse, talented, and engaged team.

We offer competitive salaries, advancement opportunities, and a comprehensive benefits package. Join our team today!

Equal Housing Lender / Member FDIC