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DEMYSTIFYING THIRD PARTY RISK MANAGEMENT (TPRM)

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AGENDA

Background and Context

- Regulatory Landscape
- Cost of Failure
- Third-Party Risk Management Definitions

Third Party Risk Management Framework TPRM Program Challenges and Critical Success Factors Appendix



BACKGROUND AND CONTEXT

REGULATORY LANDSCAPE

Regulators are clear that organizations are responsible for services provided by third-parties as if it were provided in-house.

EU regulation

EU General Data Protection Regulation (GDPR):

"The controller shall be responsible for, and be able to demonstrate compliance with, paragraph 1 ('accountability')".

REGULATION (EU) 2016/679 Article 5 - Principles relating to processing of personal data

The EU (GDPR) makes organizations ("Controller/s") **accountable** for data breaches caused by third-party service providers

US regulation

US (Federal Deposit Insurance Corporation) FDIC: "An institution's board of directors and senior management are ultimately **responsible for managing activities conducted through third-party** relationships, and identifying and controlling the risks arising from such relationships"

FIL 44-2008

US DODD-FRANK ACT:

"A service provider is "any person that provides a material service to a covered person in connection with the offering or provision by such covered person of a consumer financial product or service"; a covered person is "any person that engages in offering or providing a consumer financial product or service; and any affiliate of a person described [as such] if such affiliate acts as a service provider to such person" *Dodd-Frank Act (Section 1002(26))*

US Consumer Financial Protection Bureau (CFPB):

"[We] expect institutions to oversee business relationships with service providers with the **same level of scrutiny as any other line of business** in which it is engaged."

CFPB 2012-03

US Office of the Controller of the Currency (OCC) " [A] third-party relationship is any business arrangement between a bank and another entity, by contract or otherwise". A bank's **use of a third party "does not diminish the responsibility** of its board of directors and senior management to ensure that the activity is performed in a safe and sound manner and in compliance with applicable laws". *OCC 2013-29*

COST OF FAILURE CAN BE HIGH

Effective 3rd party management helps guard against incidents that can cause major financial and reputational damage to an organisation

FCA fines RBS, NatWest and Ulster Bank Ltd £42 million for IT failures

XX RBS 🖧 NatWest 器Ulster Bank

"The Financial Conduct Authority (FCA) fined the Royal Bank of Scotland Plc, ("RBS") National Westminster Bank Plc ("NatWest") and Ulster Bank Ltd ("Ulster Bank") (the "Banks") £42 million for IT failures which occurred in June 2012 and meant that the Banks' customers could not access banking services. The actual cause of the IT incident was a software compatibility problem with the underlying cause being the Banks' failure to put in place adequate systems and controls to identify and manage their exposure to IT risks" (FCA, Nov 2014)



Thomas Cook boss apologises to family over Corfu deaths

"The chief executive of Thomas Cook has apologised to the family of two children killed by carbon monoxide poisoning in Corfu after a public outcry over the company's handling of the incident. Thousands of people have posted abuse on Thomas Cook's Facebook page and threatened a boycott after the parents of Bobby and Christi Shepherd, who died aged six and seven, accused the company of "profiting" from the deaths when it emerged that Thomas Cook had received £3m of compensation **Thomas** from the hotel chain responsible for the incident" (FT, May 2015)

Universal Music Group



"It came to light that a Universal Music Group contractor neglected to protect an Apache Airflow server, leaving data exposed; while a Honda affiliate in India left two Amazon S3 buckets misconfigured for more than a year. The Honda mistake affects 50,000 users of the Honda Connect App, while UMG exposed corporate keys to the kingdom". (Threatpost, June 2018)



2013 Target Data Breach

"Target's profit for the holiday shopping period fell 46 percent from the same guarter the year before... It's spokeswoman, Molly Snyder, says the intruders had gained access to the system by using stolen credentials from a third-party vendor.... the vendor was a refrigeration and heating company near Pittsburgh called Fazio Mechanical Services. A statement on Fazio's website says its IT systems and security measures are in compliance with industry practices, and its data connection to Target was purely for billing, contract submission, and project management." (Bloomberg, 2014)

TPRM DEFINITIONS

Third Parties

Any business arrangement between an organization and another entity, by contract or otherwise. Many people equate Third Parties with typical vendors, but that's not always the case.



Third Party Risk Management

The function responsible for identifying, managing and monitoring risks associated with Third Parties and providing competent oversight of these relationships. This enables the identification and engagement of Third Party service providers who can meet the needs of an organization based on requirements set forth in their contracts.





Third Party Risk Stratification

The process of rating and ranking the services provided to an organization by Third Parties based on risks inherent to the services (Operational, Strategic, Compliance, Credit, Reputational, etc.).

Third Party Relationship and Risk Management (TPRRM) is the oversight and governance of potential risk that arises from organizations relying upon outside parties to perform services on their behalf.

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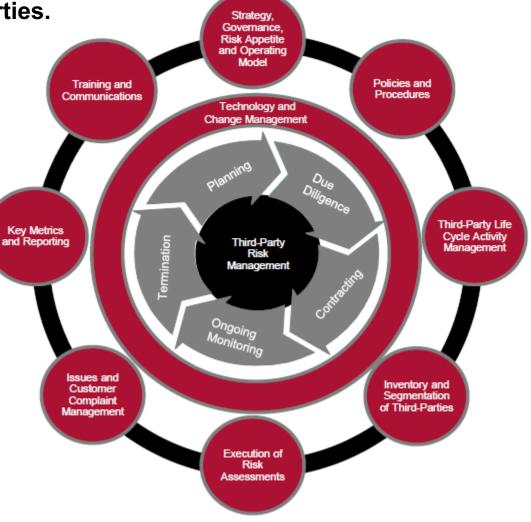
THIRD PARTY RISK MANAGEMENT FRAMEWORK

TPRM FRAMEWORK

A TPRM Framework outlines the key approach and continuous processes to embed across the organization to ensure appropriate control for all third-parties.

To be best in class, firms should develop or improve:

- A comprehensive database of third-party relationships. Many firms find it difficult to build this list; enterprise-wide surveys and data analytics are effective tools.
- A comprehensive catalog of specific risks to which third-parties can expose the firm. Many institutions don't fully understand all the risks their third-parties run. An 'intelligent' master risk register is useful in this regard.
- A risk-based segmentation of third-parties. Not all suppliers carry the same amount of risk. Firms need to better triage their suppliers to make sure the most effort is devoted to the highest risks.
- **Rules-based due diligence testing.** Carefully designed rules can help firms focus and prioritize their investigation of suppliers.
- A disciplined governance and escalation framework. At many firms, third-party risk management does not have a natural owner. Establishing one and giving that group the right decision-making powers is essential.
- Integrated technology and MIS workflow process and tools. Adapting current risk IT applications to third-party management is tricky, and building a new one is even harder. Off-the-shelf applications exist, but these run the risk of feeling like 'add-ons' and suffer with adoption. There must also be effective executive transparency to risk through dashboards and MI.



TPRM FRAMEWORK TPRM PROGRAM APPROACH

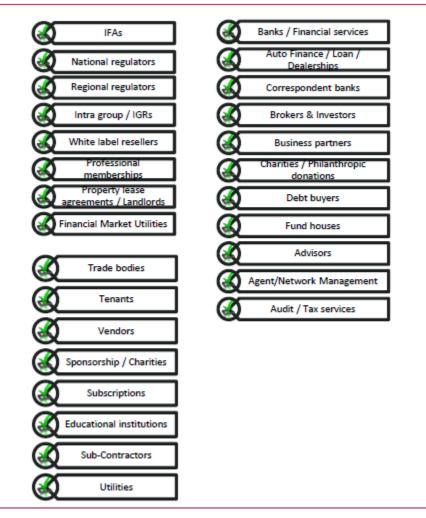


The Third-Party Management Program establishes a framework to manage third-parties within an organization. The establishment of the framework includes the definition of policies, procedures, methodology and templates to support the management of third-parties appropriate to the services and/or goods provided and associated level of risk.

Define policy and procedures	Define risk classification methodology	Define performance management activities	Develop third party management program templates
 Definition of roles and responsibilities Definition of framework and authorities Definition of third-party management processes that outline high level activities and owners from the identification to the disengagement of a third- party 	 Identification of qualitative and quantitative criteria Definition of quantitative and qualitative criteria by level of third-party risk Assignment of weights to qualitative and quantitative criteria 	 Define performance management activities Assign frequency of performance management activities by level of third-party risk 	 Develop Risk Classification Methodology template Develop performance management activities by level of risk template Develop performance management activities templates (e.g. performance scorecard)

TPRM FRAMEWORK TPRM PROGRAM APPROACH

Examples of Third-Parties



Strategy, Governance, Risk Appetite and Operating Model

Risks to consider

Typically considered risks

- Business Continuity & Resiliency
- Information Security
- Privacy
- Physical Security
- Reputational Risk
- Subcontractor Risk
- Financial Risk

Less frequently considered risks:

- Dependency Risk
- Legal & Regulatory Compliance
- Intellectual Property
- Commercial & Competition
- Operational Competency Risk
- Geographical Risk
- Contractual
- Sustainability
- Security & Data Protection
- Software Licencing
- Currency risk
- Concentration Risk
- Technology Risk

TPRM FRAMEWORK ESTABLISHING THIRD-PARTY INVENTORY



Segmentation is a key element of TPRM, and results in appropriate resource alignment to Third-Party engagements

Total Third-Party Inventory from Common Third party Inventory data attributes various data sources Business Lines/Processes Supported by the **Third-Party Name** Third-Party Third-Party Parent Name/Associated Third-Country/Region where Third-Party is based Parties Begin with A/P Spend and LOB files Contract Date (Engagement Date) and remove categories or spend Product/ Service that do not classify as third-parties **Results of Third-Party Risk Classification** Third-Party Type (Business Process (i.e. employee or customer Results of Third-Party Risk Assessments (e.g. reimbursements) Outsourcing, Partnership, Technology etc.) Third-Party Information Security Assessments) Spend Third-Party Risk Classification Methodology Identify categories of low or no risk and removed from population The degree to which an organization is exposed if a third-party fails to meet the contractual commitments varies widely. A Third-Party Risk Classification Methodology allows an organization, through a series of pre-defined • criteria, to identify the level of risk associated to a third-party (e.g. high, moderate, low, minimal to no **Risk Assessment criteria** risk). applied at the engagement Risk classification of a third-party can include quantitative (e.g. spend, volume) and qualitative (e.g. level to remove low risk engagements number of third-parties that provide the same service, supports regulatory required activity) criteria. Qualitative and quantitative criteria can be assigned weights to emphasize key criteria within the organization (e.g. supports regulatory required activity higher weight than # of third-parties that Remaining critical, high & moderate risk third-parties have provide the same service). been identified and ongoing Level of risk associated to a third-party can be used to determine Third-Party Management Program management activities can be activities such as performance management and third-party operational reviews. planned and executed

TPRM PROGRAM CHALLENGES AND CRITICAL SUCCESS FACTORS

TPRM PROGRAM CHALLENGES AND CRITICAL SUCCESS FACTORS

	Challenge	Description	Critical Success Factors
1	Comprehensive database of third- parties	Many organisations find it difficult to establish this view; enterprise-wide surveys and data analytics are effective tools.	 Standard definition of a third-party Exhaustive process to identify all third-parties Single source of third-party data Maintenance of third-party data
2	Comprehensive catalogue of third- party risks	Many organisations do not fully understand all the risk areas impacting their third-parties. An 'intelligent' master risk register is useful in this regard.	 Defining and implementing risk register Capturing emerging risks Risk register and controls library should map
3	Risk-based segmentation of third-parties	Organisations need to better triage their third-parties to ensure effort is applied to the right third-parties at the right time.	 Single risk segmentation model Defined risk appetite Risk management activities based on risk profile Risk aggregation rules
4	Rules-based due diligence testing and ongoing monitoring	Carefully designed rules can help organisations focus and prioritise their investigation of third-parties.	 Systematic methodology for due diligence Define rules for due diligence requirements Scalable platform for execution & automation Data into single source
5	Governance and escalation framework	TPRM does not always have a natural owner. Establishing one with the right decision-making powers is essential.	 Ownership agreed by all stakeholders Owner to have sufficient influence over Third- Party Risk Management assets
6	Integrated technology and MIS	Off-the-shelf applications exist, but these run the risk of feeling like 'add-ons' and suffer with adoption.	 Defined and embedded processes Holistic data model (third-parties) Fit-for-purpose technology Strong change control process for technology



ACCENTURE LATVIA SECURITY PRACTICE



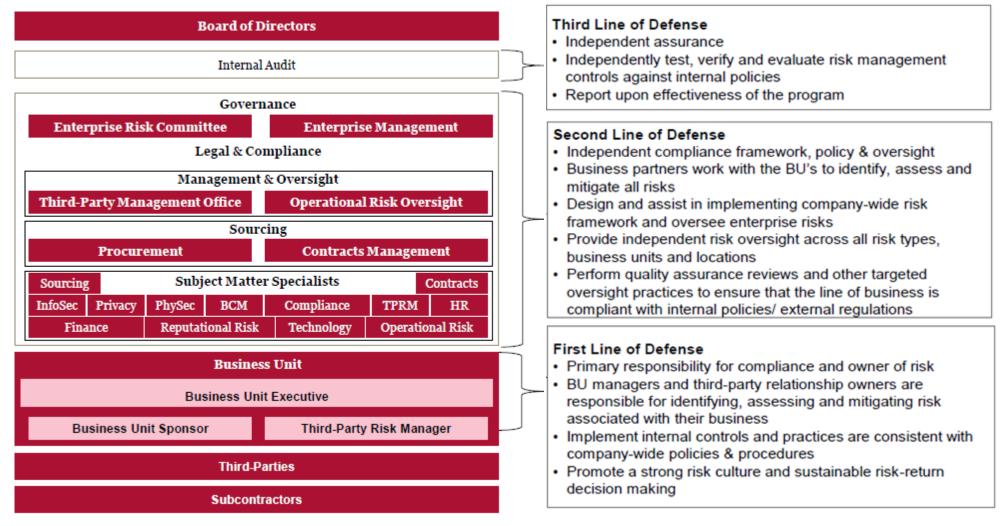
CONTACTS: sheldon_nailer@hotmail.com

APPENDIX

TPRM FRAMEWORK TPRM GOVERNANCE FRAMEWORK



A specific TPRM function can be embedded within the existing governance framework, providing appropriate internal expertise. A TPRM strategy is supported by three lines of defense – the first line lies within each individual Line of Business and is empowered by the second line who owns the provision of ongoing guidance, tool support, and facilitation of cross-business collaboration. The third line is responsible for evaluating the design and operating effectiveness of the Program.



TPRM FRAMEWORK BUILDING ROBUST THIRD-PARTY RISK MANAGEMENT POLICIES



Policies and procedures for Third-Party Risk Management should at a minimum consider and include:

- **Compliance and Regulation:** Appropriate oversight of third-parties to ensure they comply with legal requirements, any supervisory guidance, and internal policies and procedures
- **Due Diligence.** Steps to perform appropriate due diligence on potential and current third-party qualifications, expertise, capacity, reputation, complaints, information security, document custody practices, business continuity, and financial viability
- Business Continuity: Processes to prepare contingency and business continuity plans that ensure the continuing availability of critical third-party services and business continuity of the organization both to address short-term and long-term service disruptions and to ensure an orderly transition to new service providers should that become necessary
- Information Security: Measures to ensure all original records transferred to third-parties remain within the custody and control of the third-party and are returned to designated custodians at the conclusion of the performed service, along with all other documents necessary for the organization's files
- **Contracts:** Processes to ensure that third-party contracts provide for adequate oversight, including requiring third-parties adherence to the organization's standards, measures to enforce third-party contractual obligations, and processes to ensure timely action with respect to third-party performance failures
- Fee Structures: A review of fee structures for third-parties to ensure that the method of compensation considers the accuracy, completeness, and legal compliance of activities and is not based solely on volumes or meeting processing timelines
- **Deliverables:** Processes to ensure periodic reviews of third-party's work for timeliness, competence, completeness, and compliance with all applicable Legal Requirements, and the organization's contractual obligations to investors
- **Customer Complaints:** Processes to review customer complaints about third-party's services
- **Certifications:** A periodic certification process for firms that were qualified/designated to serve as third-parties to the organization and to ensure they continue to have the experience and competence required to perform the services
- Accuracy: Measures to ensure the accuracy of all documents filed or otherwise utilized on behalf of the organization

TPRM FRAMEWORK EXECUTION OF RISK ASSESSMENT



Execution of risk assessment requires understanding the scope, identifying gaps, developing risk mitigation enhancements, tracking status towards target state. Assessment and heat map tools can aid significantly in the execution of risk assessment

Third-Party Risk Assessment

Risk	C	St	atus	Ctatura	
Assessment	Scope	Gap Analysis	Remediation	Status	
	TPISA	•	۲		
Information Security Risk	Vulnerability Assessment	•	•		
	SOC1/SOC2	•	•		
	AML	•	Not Applicable		
Compliance	Anti-Bribery (AB&C)	•	Not Applicable		
Risk	Sanctions Screening	•	•		
	Customer Compliant	•	•	In Progress	Critical
	CoB Testing	•	•		C
	4 th Party Assessment	•	•		
Operational	Performance Review	•	•		
Risk	Financial Assessment	•	Not Applicable		
	Exit Strategy	•	•		
	Legal Hold	•	•		

Third-Party Risk Heat Map

	Third-Party	System Registra tion	Contract Analysis	Perform ance Review	Financial Evaluati on	COB Testing	Exit Strategy	4th Party Attestatio n	Informatio n Security
sted)	Third-Party Name	с	ο	С	С	E	С	С	с
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	Third-Party Name	С	0	С	С			С	TBD
Spend	Third-Party Name	С	ο	С	ο			С	
Major Spend	Third-Party Name	С	0	С	С			С	
	Third-Party Name	С	0	С	С			С	
C = Comple	te	0 =	On Track	(In prod	ress	E = Exce	ption / G	aps Identif	ied

O = On Track / In progress E = Exception / Gaps Identified

ACCENTURE'S TPRM THOUGHT LEADERSHIP

Accenture's TPRM capabilities are supported by a significant number of 'ready to go' pieces of research that bring insight and will accelerate the approach to the engagement.

Procurement Risk Management



Supplier Relationships: Cracking the Value Code



Designing Dynamic Operations



Supplier Working Relationship Index



TPRM Benchmarking Study

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ACCENTURE TPRM TOOLS

Accenture's TPRM are supported by a significant number of 'ready to go' tools and assets that bring insight and will accelerate delivery of the TPRM assessment, future state definition, and reporting templates.

TPRM Capability Framework



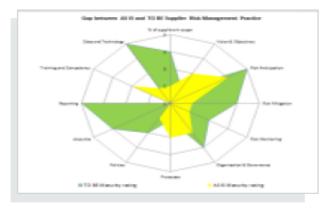
Requirements Template

High Level Standards	Description	Impact on Sourcing?
Principles for Businesses	the fundamental obligations of all firms under the regulatory system	O
Senior Management Arrangements, Systems and Controls	the responsibilities of directors and senior management	•
Threshold Conditions	the minimum standards for becoming and remaining authorised	O
Statements of Principle and Code of Practice for Approved Persons	the fundamental obligations of approved persons	0
The Fit and Propertest for Approved Persons	the minimum standards for becoming and remaining an approved person	0
Financial Stability and Market Confidence Sourcebook	Provisions relating to financial stability, market confidence and short selling	0
Training and Competence	the commitments and requirements concerning staff competence	0
General Provisions	interpreting the Handbook, face, approval by the FSA, emergencies, status disclosure, the FSA logo and insurance against fines	0
Fees Manual	the fees provisions for funding the FSA, FOS and FSCS	0

Regulation Analysis and Experience

Bank Regulations	Gapital Markets / Settlement / Collectrals / Payments					
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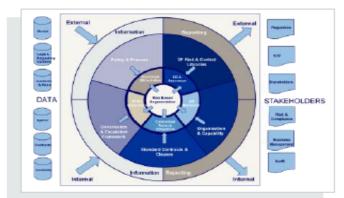
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Gap Analysis

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Target Operating Model

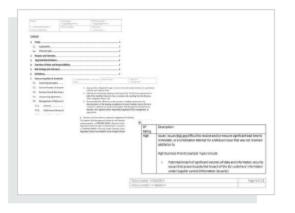


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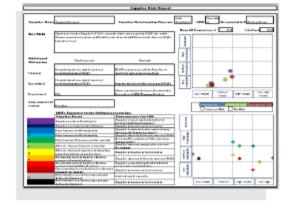
ACCENTURE TPRM TOOLS (CONTINUED)

Accenture's TPRM are supported by a significant number of 'ready to go' tools and assets that bring insight and will accelerate delivery of the TPRM assessment, future state definition, and reporting templates.

Model Policies and Governance



TPRM Toolkit



TP Monitoring Scorecard

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TP Tiering Strategy

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TP Segmentation Tool

