

Legal & Compliance Portal				
Control Management	Audit Management	Cross Border Travel Mgmt	Incident Management	External Mandates
<ul style="list-style-type: none"> <li>➤ Control Definition</li> <li>➤ Task Assignment</li> <li>➤ Multi Dimension</li> <li>➤ Monitoring &amp; Reporting</li> </ul>	<ul style="list-style-type: none"> <li>➤ Audit/Review Management</li> <li>➤ Findings Management</li> <li>➤ Issue Tracking</li> <li>➤ Activity Implementation</li> </ul>	<ul style="list-style-type: none"> <li>➤ Client related</li> <li>➤ Non-Client related</li> </ul>	<ul style="list-style-type: none"> <li>➤ Regulatory</li> <li>➤ Financial</li> </ul>	<ul style="list-style-type: none"> <li>➤ Public Directorships</li> <li>➤ Private Directorships</li> <li>➤ Secondary Occupations</li> </ul>

- Single system login for all Legal & Compliance related matters
- Enterprise-wide alignment of initiatives
- Full consideration of divisional/ regional/ functional characteristics
- Powerful reporting and monitoring
- Co-existence with complementary tools

**Efficient and powerful Legal & Compliance Portal platform**

# Internal Controls and Audit Management System

## The solution for you?

### Need for action

- Increasing statutory regulations demanding transparency across enterprises.
- Pending business requirements not realizable on existing platform or no existing control governance infrastructure.
- Audit management needs robust integration into enterprise application.

### Key developments

- Increased regulatory pressure to demonstrate effective supervision
- Clear intention to strengthen supervision to protect the enterprise from adverse effects
- Need to leverage daily control activities to achieve efficiency gains in maintaining compliance with regulatory requirements

## The solution is ICAM

- Use implementation of ICAM to lay the groundwork for a enterprise-wide supervisory control platform
- Use implementation of ICAM Audit management module to offer generic control issue tracking
- Extend beyond divisional / regional / functional boundaries to provide global solution

# Database driven not Document driven

## Database architecture not document management

ICAM uses a framework that encompasses a powerful database architecture and Java application platform solution, that is easily scaleable, which allows you to quickly find the information you need. Database driven systems are more powerful than simple document based systems.

All key information, such as findings, issues, implementation progress, execution activities, signoffs and history are all contained in an Oracle database which bring efficiencies to the documentation and review progress.

Database driven systems such as ICAM allow for real time team based use by thousands of users, providing ease of use with a modern interactive Web based interface to facilitate storage, retrieval, sorting or filtering of information.

# Risk Convergence in ICAM

## Laws, Regulations and Policies

Relevant laws & regulations are adapted and embedded into the application as a company wide policy framework. ICAM allows systematic mapping of relevant policies to control objectives and consequently to underlying control activities.

## Corporate Governance Structures

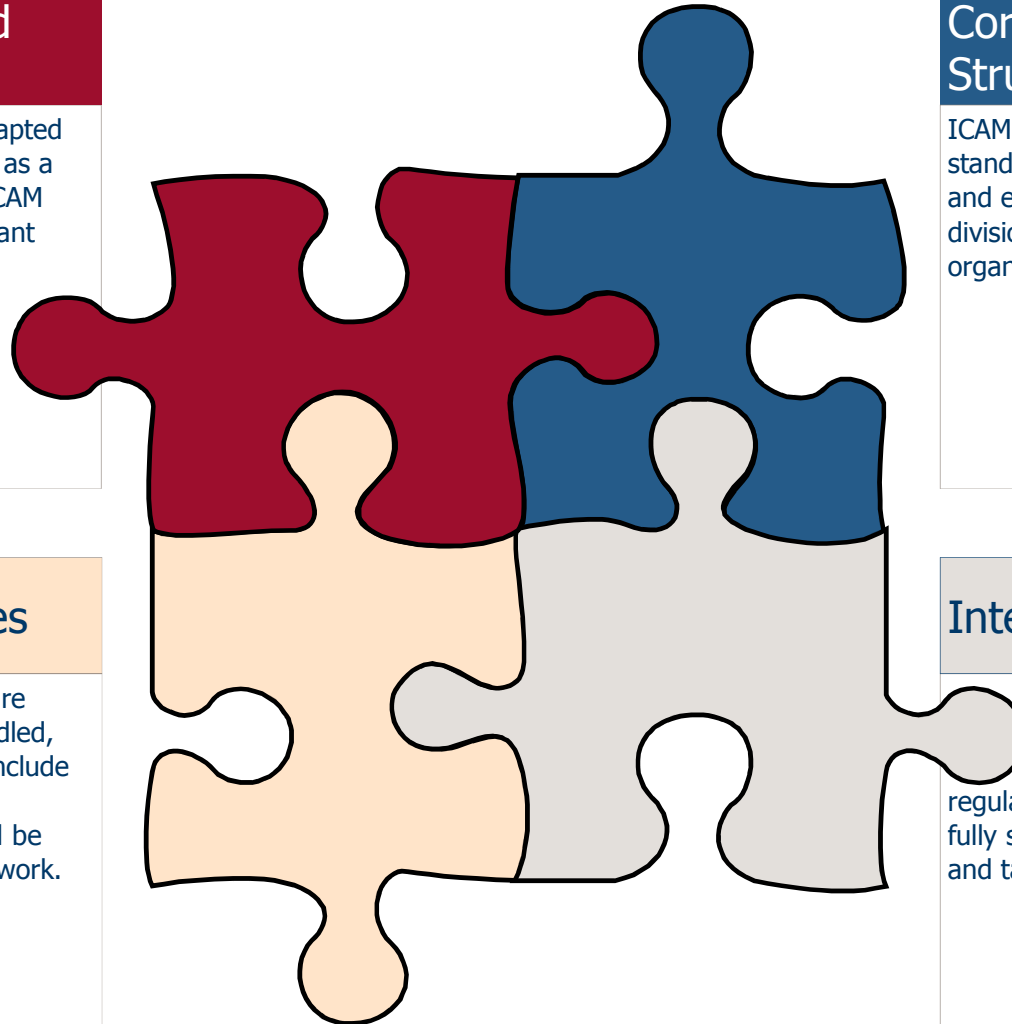
ICAM is designed to operate in line with standard control governance structures and enables enterprise-wide oversight of divisional/ regional or matrix organisations.

## Deficiencies and Issues

Issues identified in the enterprise are raised, documented, assigned, handled, and archived in ICAM. Issues can include internal or external audit recommendations and these can all be linked to the internal control framework.

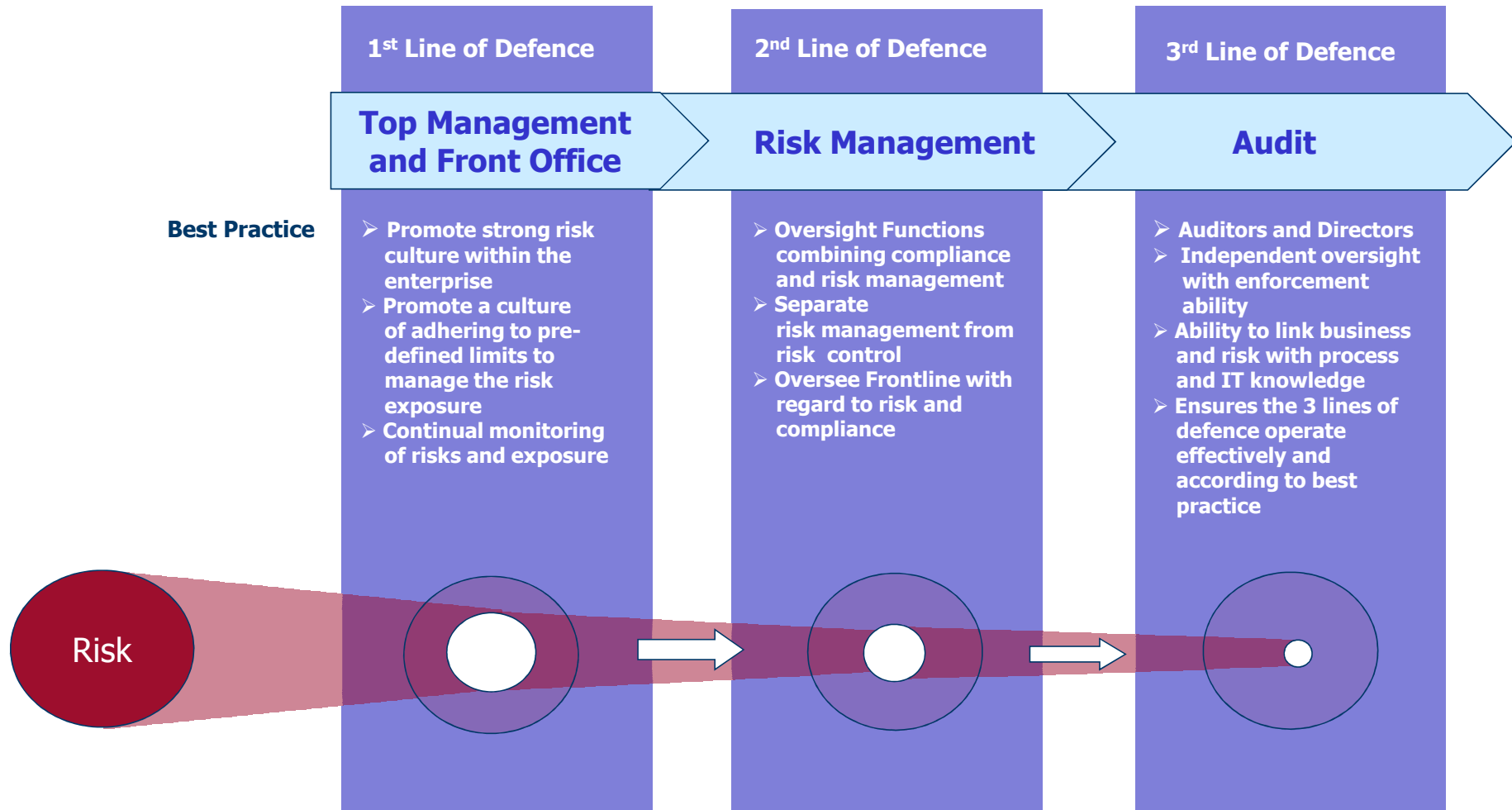
## Internal Controls

Detailed specification and classification of controls ensures full compliance with laws, regulations, and policies. In addition it fully supports the achievement of strategic and tactic goals.



# Risk Management Governance

## "Three Lines of Defence" Model



# Segregation of Duties

## Internal Controls and Segregation of Duties

**Societe Generale, \$7 billion in losses:** Operations expert moved to trading desk, taking some jobs with him.  
**Barings Bank, \$1 billion in losses:** Operations and trading managed by the same individual.  
**Lehman Brothers, \$0.3 billion in losses:** Sales manager took over certain simple operations functions.  
**Daiwa, \$1.1 billion in losses:** Same scenario as Societe Generale.  
**Allied Irish Bank, \$0.7 billion in losses:** Risk limit reporting under control of trader.  
**Tyco, \$0.3 billion in losses:** Three top executives colluded and board of directors exercised ineffective supervision.  
**Orange County, \$1.6 billion in losses:** Trader seen as the unquestioned maestro, while back office was underpowered to understand his trading procedures.

## Why SoD ?

- Required by Sarbanes Oxley
- Proven management technique that organisations of all sizes can benefit
- Primary objective is the prevention of fraud and errors
- With good SoD it requires 2 or more employees for irregularities to occur without detection
- Organise to achieve adequate segregation of duties – see ISACA's Segregation of Duties Control matrix
- Define general categories of functions to be separated

## ICAM supports and enhances SoD

- Structured segregation of duties via dynamic role assignment
- Enables management oversight of duties
- Fully supports the ISACA's Segregation of Duties Control matrix
- Reports SoD anomalies