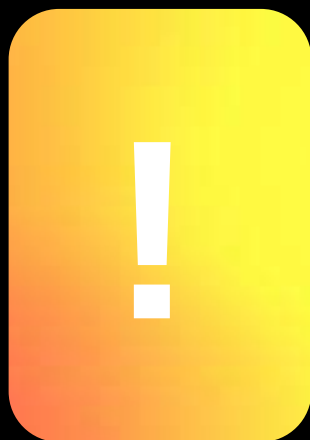




W E L C O M E



ADAPTIVE G R C



Raiders of the Lost Compliance: Indiana Jones' approach to Third-Party compliance and risk management



Jan Anisimowicz

Board Member, C&F SA Poland

AdaptiveGRC product



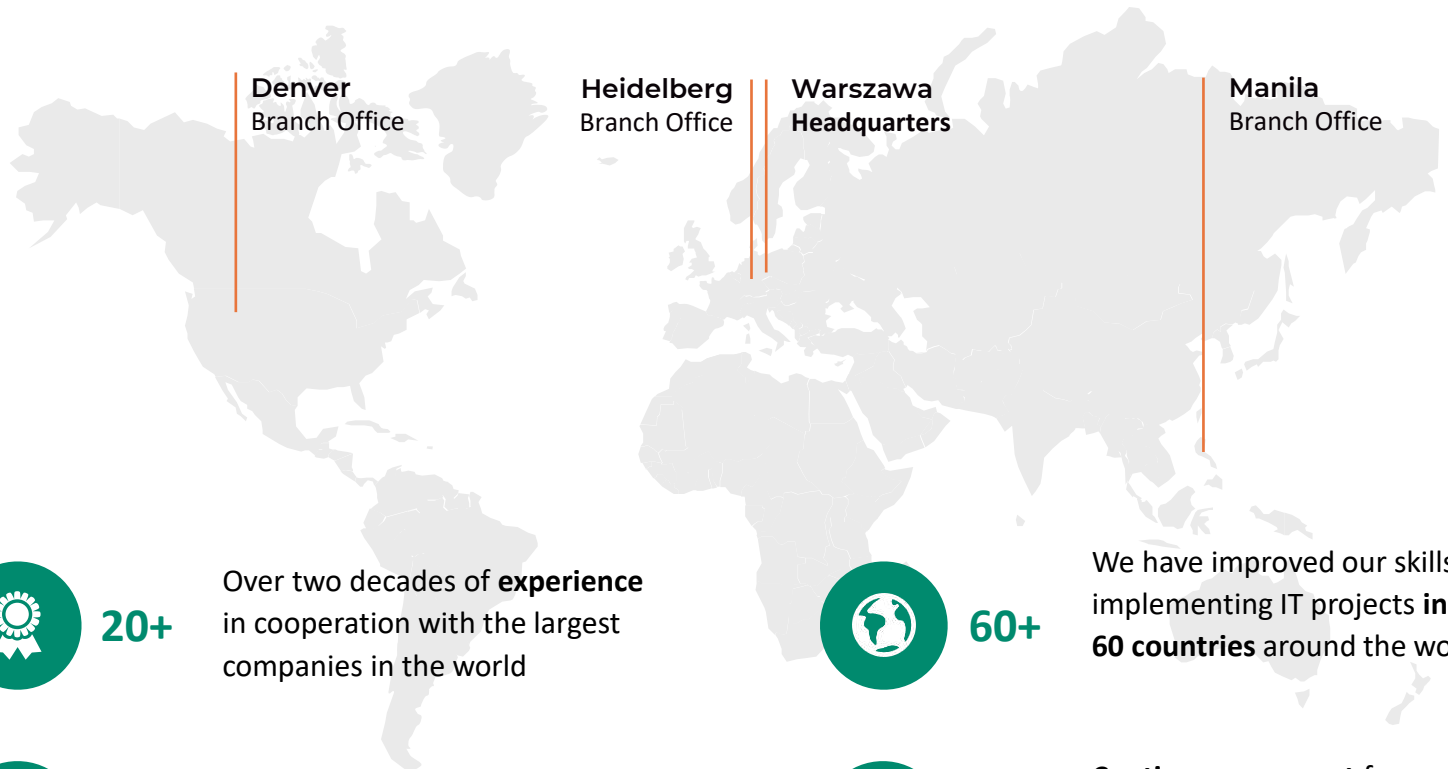
Jan Anisimowicz
Board Member, C&F SA Poland
AdaptiveGRC product

Key facts about C&F, owner of AdaptiveGRC

For over 20 years, C&F has been providing solutions for the largest international organizations, including those from the Fortune 500 list.

Our clients include companies from the following sectors:

- Banking
- Financial Services
- Pharma and life sciences
- Animal health
- Transport/logistics
- Human Resource Management



20+

Over two decades of **experience** in cooperation with the largest companies in the world



420+

More than **420 professionals** with the highest qualifications and skills



60+

We have improved our skills by implementing IT projects **in over 60 countries** around the world



24/7

Continuous support for users whenever they need it



01

*Challenges
connected with
Vendors*

02

*Recommended
steps to ensure
Vendor
compliance*

03

*Case study -
why should
you know your
Vendors?*

04

Summary

01

*Challenges
connected with
Vendors*





Photographer: NASA via Getty Images

Business

NASA Says Metals Fraud Caused \$700 Million Satellite Failure

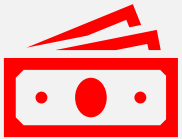
By [David Stringer](#)

May 1, 2019, 3:34 AM GMT+2

Updated on May 1, 2019, 11:53 AM GMT+2



Loss of reputation



Penalties for non-compliance (regulator)



Legal responsibility



Operational / Business Interruptions

WHY DO WE NEED VENDORS / SUBCONTRACTORS?

01

Challenges
connected with
Vendors

KEY DRIVERS



WHY DO WE NEED VENDORS/SUBCONTRACTORS?

01

Challenges
connected with
Vendors

NASA has contracted with the private sector for most of the services and products it uses.

AROUND 400 SUBCONTRACTORS

“The agency had approximately 400,000 talented people who contributed to putting the first human on the Moon,” a NASA spokesperson told ClearanceJobs via an email. “According to the figures we have in our collection, NASA had 33,200 federal employees and 377,000 contractors in the mid-1960s.”

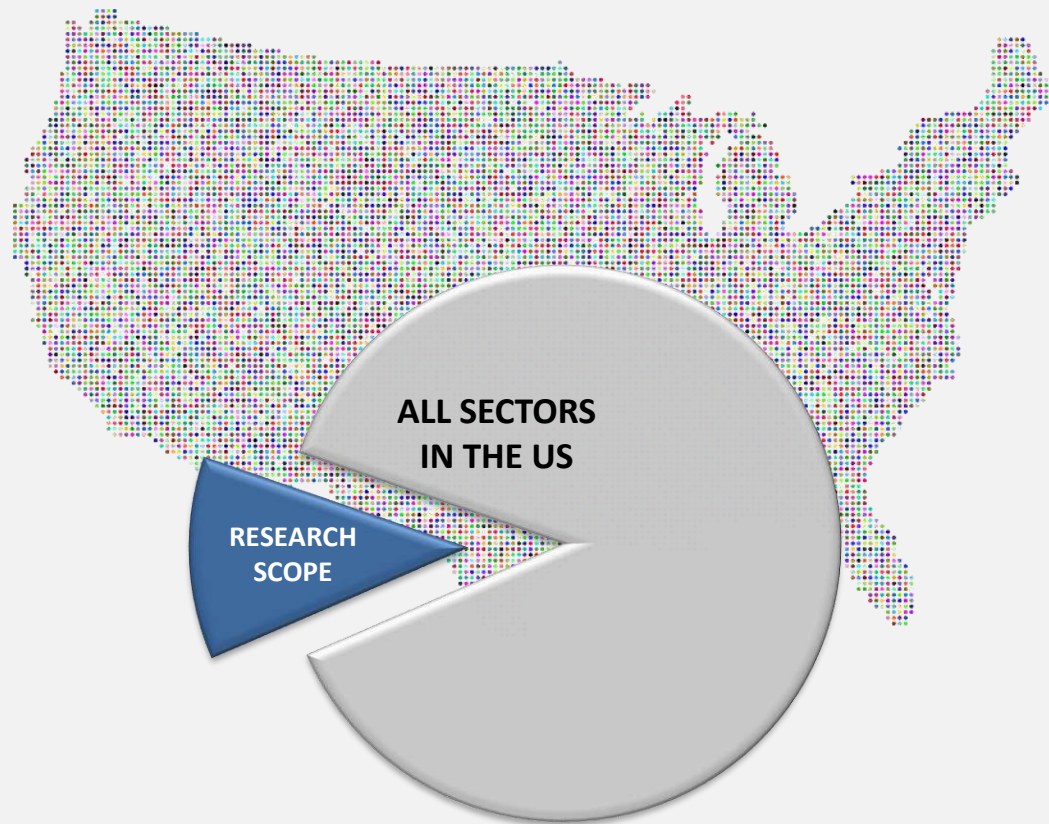
<https://news.clearancejobs.com/2019/07/17/how-government-contractors-helped-send-a-man-to-the-moon-celebrating-apollo-11/>

RESEARCH FOCUSED ON THE GRC AND VENDOR MANAGEMENT MARKET IN THE US

01

Challenges
connected with
Vendors

Consulting project with UCLA as part of GAP (Global Access Program)



Less than 12%

~30% 😞



CHOSEN CHALLENGES ASSOCIATED WITH VENDORS

OPERATIONAL PERSPECTIVE

01

Challenges
connected with
Vendors

[1] We do not have a list of vendors.

[2] We have many lists of vendors. Manual process – Spreadsheet driven

[3] We have too many vendors and it is hard to manage risks effectively.

[4] We do not know services that our vendors are delivering for us.

...

[8] Vendors could have vendors. How do we address the risks associated with those „**Fourth party**” vendors? ...

[7] We do not have a budget to mitigate risks coming from 3rd parties.

[6] We do not have a solution/process to continuously evaluate vendors based on assessment results.

[5] We do not have resources to audit nor assess our vendors.

HOW TO START TO APPROACH AN EFFICIENT VENDOR RISK MANAGEMENT PROCESS?

APPROACH

01

Challenges
connected with
Vendors





02

*Recommended
steps to ensure
Vendor
compliance*



THE RIGHT PATH

- LEWIS CARROLL, ALICE IN WONDERLAND

02

Recommended
steps to ensure
Vendor compliance

ALICE:



*WOULD YOU TELL ME,
PLEASE, WHICH WAY I
OUGHT TO GO FROM HERE?*



*I DON'T MUCH CARE
WHERE.*



...SO LONG AS I GET SOMEWHERE.



THE CHESHIRE CAT:

*THAT DEPENDS A GOOD DEAL ON
WHERE YOU WANT TO GET TO.*



*THEN IT DOESN'T MUCH
MATTER WHICH WAY YOU GO.*



*OH, YOU'RE SURE TO DO THAT, IF
ONLY YOU WALK LONG ENOUGH.*



VENDOR MANAGEMENT PROCESS - APPROACH

02

*Recommended
steps to ensure
Vendor compliance*

FROM THE VENDORS SIDE

AGILE FOR THE "BRAVES" 😊

ONE OF THE POTENTIAL WAYS...

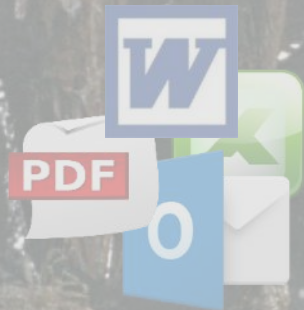
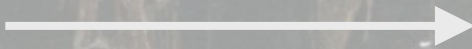
AGILE FOR THE "BRAVES"...

02

*Recommended
steps to ensure
Vendor compliance*

LET'S KEEP OUR FINGERS CROSSED
THAT THIS WILL NEVER HAPPEN AGAIN.

WHATEVER EVIDENCE
IS AVAILABLE



**WRONG
WAY**

GO BACK

**Don't
Panic!**

AUDITOR IS AROUND THE CORNER!
!@#\$%^





INDIANA JONES APPROACH TO THIRD-PARTY RISK MANAGEMENT in 8 Steps

1

2

3

4

5

6

7

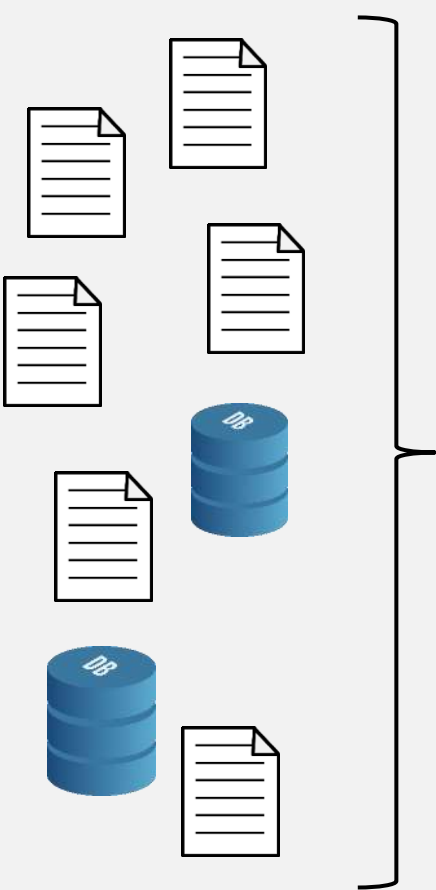
8

CREATE / CONSOLIDATE LIST OF VENDORS

STEP 1

02

Recommended steps to ensure Vendor compliance



TIP 1



Sometimes this activity would be easier to deliver as part of a **Vendor Consolidation Project** (costs rationalization in the organization)

Vendor Name	Contact	Email	Address	(...)
C&F LLC	...	...	...	...
AdaptiveGRC SA	...	...	...	...
Audit Masters Inc.	...	...	...	...

TIP 2



It would be helpful to have **similar information** about all the vendors



CREATE A LIST OF SERVICES THAT YOU CONSIDER RELEVANT TO YOUR ORGANIZATION

STEP 2

02

Recommended
steps to ensure
Vendor compliance

Outsourced business functions
(IT services, Accounting, cleaning service)

Subcontracting

Data hosting

Data processing

System Maintenance

Pizza delivery service

Cloud applications

Transportation

Facilities Management

And many, many more ...

TIP 3



In the long run, it would be beneficial for the organization to have **a hierarchy of services**

TIP 4



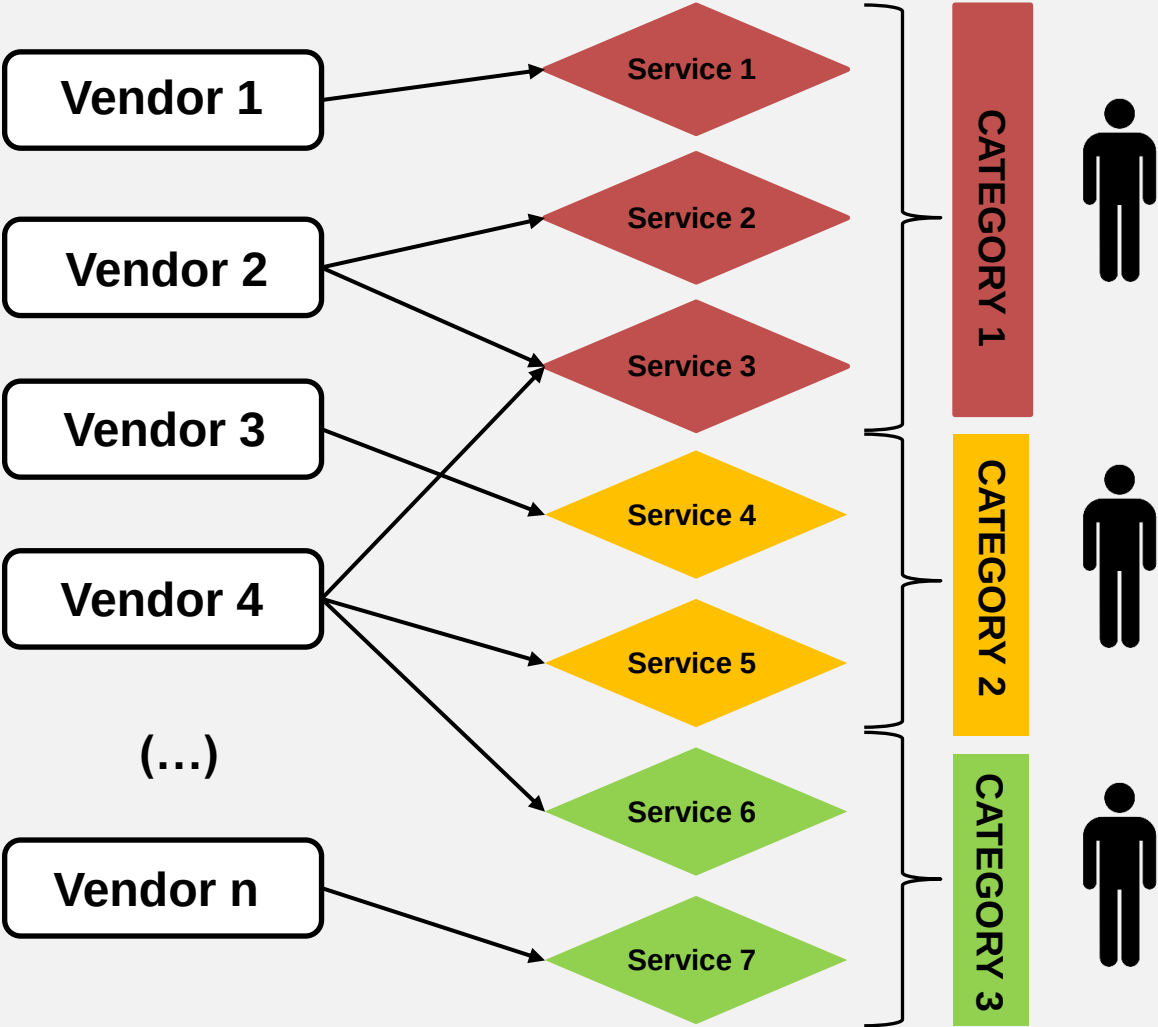
It would be useful to **assign importance** of the service for the organization



MAKE THE RELATIONS BETWEEN VENDORS AND SERVICES

STEP 3

02 Recommended steps to ensure Vendor compliance



TIP 5



Based on the categorization you can **assign business responsibility** to different colleagues in the organization (better buy-in process).

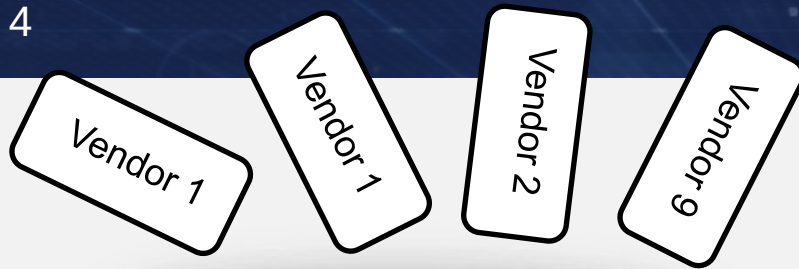


VERIFY THE NEED FOR CREATING VENDOR RISK PROFILES

STEP 4

02

Recommended
steps to ensure
Vendor compliance



TIP 6



Filtering criteria should be
harmonized in the organization.
No exceptions.



CREATE A VENDOR RISK PROFILE

STEP 5

02

Recommended
steps to ensure
Vendor compliance

SERVICES RISKS:

- ★ Compliance and regulatory risks related to the service
- ★ Customer and financial impact
- ★ Criticality level of the service delivered by the vendor for our company
- ★ Financial transactions processed
- ★ Personal and sensitive data involved?
- ★ Maturity of the service?
- ★ ...

ENTITY RISKS:

- ★ Location of the vendor
- ★ Known security incidents
- ★ Size of the company
- ★ Financial standings
- ★ Performance history
- ...



TIP 7



You have to **leverage knowledge** available in your organization (it's a **MUST**). You can enrich the data with additional information sources (like D&B, Bisnode etc.)

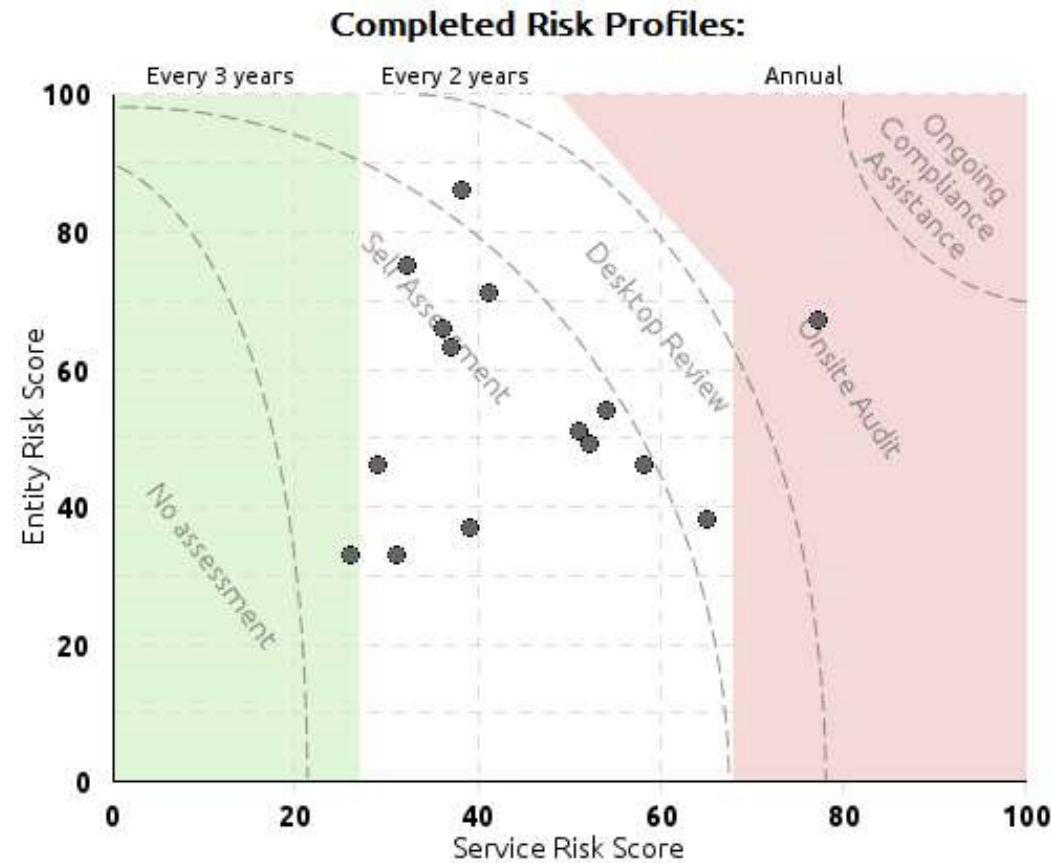


CREATE A VENDOR RISK PROFILE (SUMMARY)

STEP 5 EXAMPLE

02

Recommended
steps to ensure
Vendor compliance

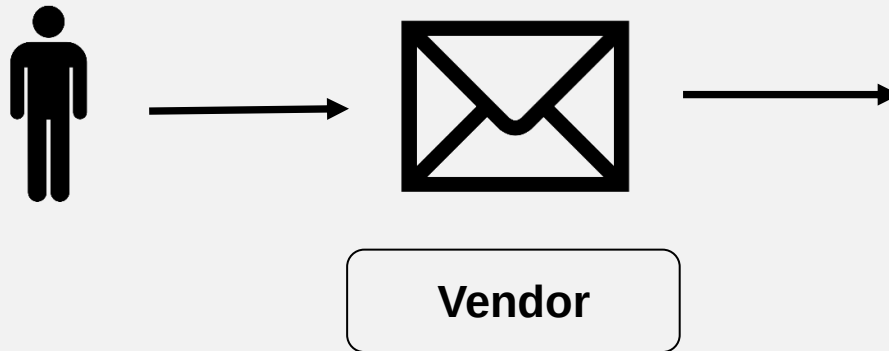


CHECK THE VENDOR COMPLIANCE AND ASSESS RISKS USING A SELF-ASSESSMENT

STEP 6

02

*Recommended
steps to ensure
Vendor compliance*



Dear John Doe,

You have been invited to participate in an online Vendor Compliance Assessment. Please use the link below to access the online system and complete the assessment.

<http://mycompanyABC.com/Assessment150>

Note: Assessment is due for completion within 14 days upon receipt.

Sincerely,
Vendor Compliance Assessment Team



RECOMMENDATION

STEP 6

02

Recommended
steps to ensure
Vendor compliance

Preview Assessment results					
Objective Id	Activity Group Parent	Activity Group	Compliance Objective	Risk Rating	Response
COB101	Information Protection	Media Security	Whenever physical media containing sensitive or regulated data is moved between locations, a movement log must track and verify that the media safely reaches the required destination and custodian	Critical	Yes
COB141	Information Protection	Incident Management	All reported events must be captured in a secure incident log or incident management system with the following information: • date and time of event • location, systems and information affected • disposition of event: classified as incident or non-incident with rationale • containment, notification and recovery outcomes. • the information/data owner	Very High	Yes
COB120	Information Protection	Information Security Management	The organization must have a documented Information Security policy. The contents of the policy includes (but is not limited to): - The identification of a single individual as the head of Information Security, with overall accountability for delivery of the information security objectives - The organizations high-level commitment, sponsorship and strategy to assure the ongoing protection of information. - A commitment to assure that information security training is provided to all appropriate resources.	Critical	No
COB121	Information Protection	Information Security Management	The security policy of the Service Organization must state that networks are required to be protected from unauthorized access and also identify the network availability requirements. The network availability and integrity requirements must comply with prevailing contractual and regulatory requirements.	Critical	Partial
COB124	Information Protection	Data Exchange	All software and data imports from a non trusted source must be checked for viruses and verified as clean before being made available in the organizations network or systems.	Critical	No
COB125	Information Protection	Information Security Management	Normal operational access privileges to workstations must prevent unauthorized software from being installed. Unauthorized software includes, but is not limited to, any software that can facilitate unauthorized access into any part of the organizations network. Installation of software without a valid software license is also prohibited.	Very High	Yes



WHAT NEXT?

02

*Recommended
steps to ensure
Vendor compliance*

HOW ABOUT

GAPS AND FINDINGS MANAGEMENT?

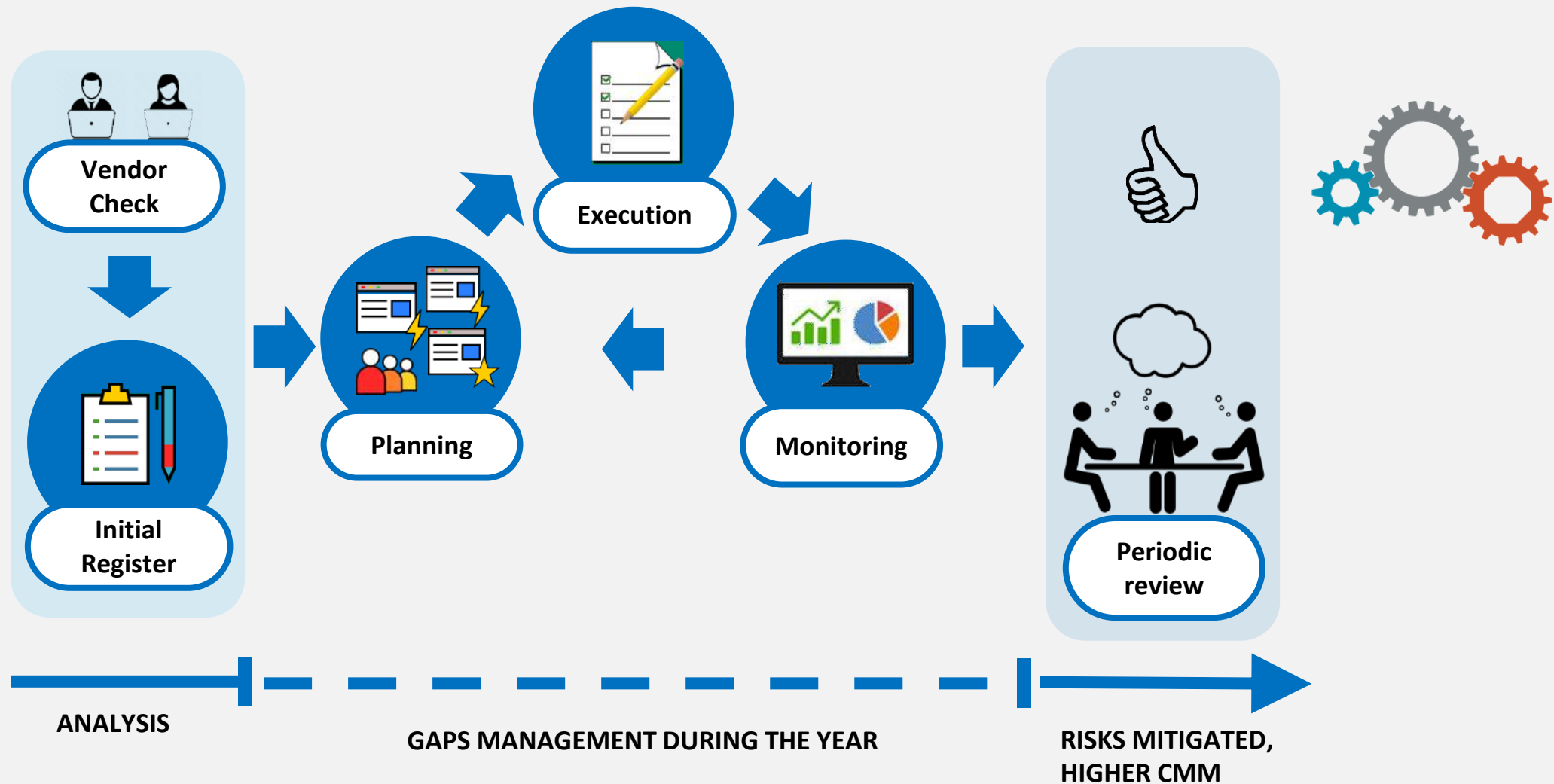


GAPS AND FINDINGS MANAGEMENT

STEP 7

02

Recommended
steps to ensure
Vendor compliance

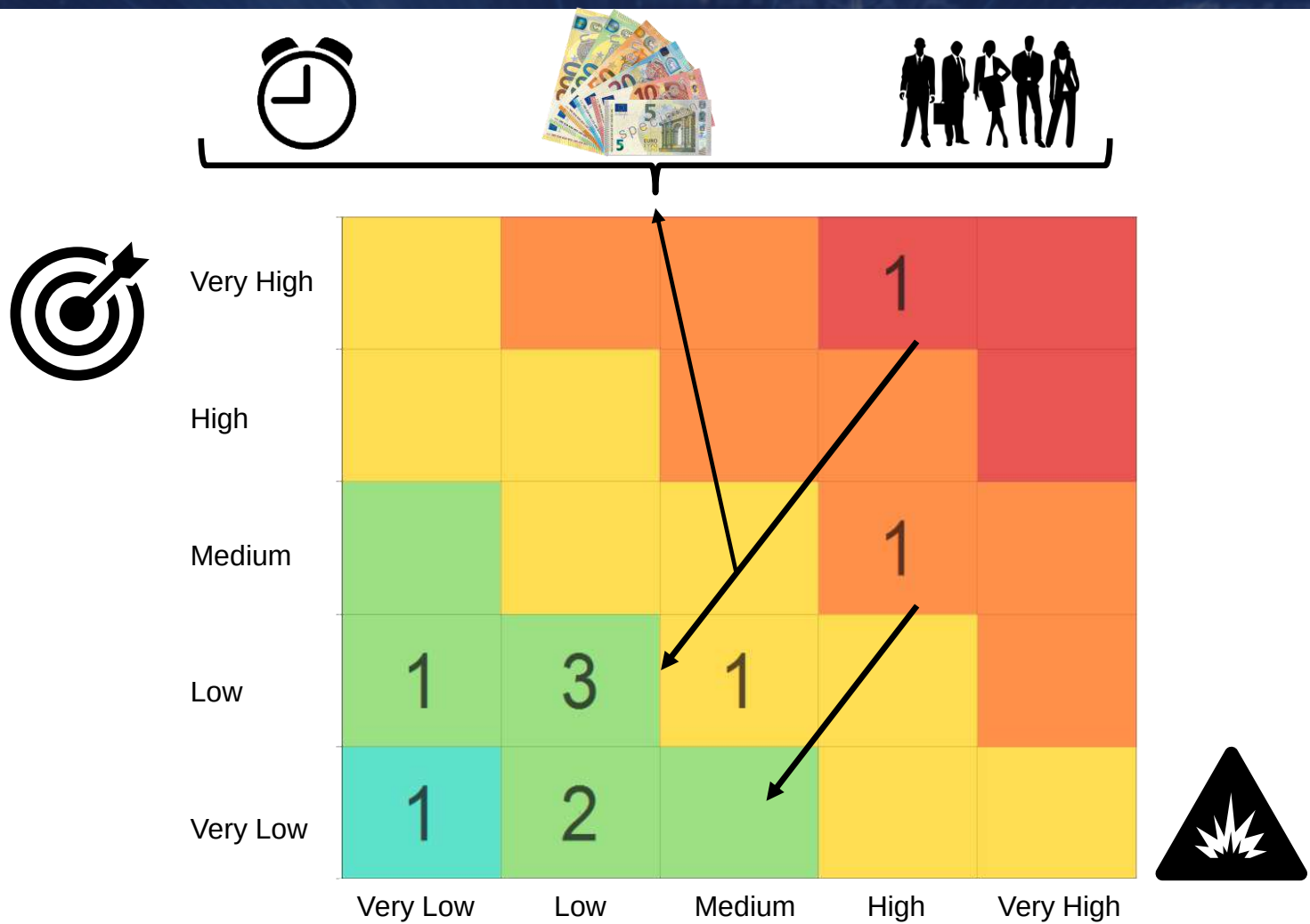


RISKS MITIGATION TO IDENTIFIED FINDINGS (PROBABILITY/IMPACT MATRIX)

STEP 8

02

Recommended
steps to ensure
Vendor compliance



INDIANA JONES APPROACH TO THIRD-PARTY RISK MANAGEMENT In 8 Steps

1 2 3 4 5 6 7 8

CREATE / CONSOLIDATE LIST OF VENDORS

STEP 1

TIP 1 Sometimes this activity would be easier to deliver an organization project (needs organization)

Vendor Name Address

INTERNAL SOURCES

CREATE A LIST OF SERVICES THAT YOU CONSIDER RELEVANT TO YOUR ORGANIZATION

STEP 2

TIP 3 In the long run, it would be beneficial for the organization to have a diversity of services

Outsourced business functions (IT services, accounting, cleaning services)

Subcontracting

Data hosting

Data processing

System Maintenance

Pizza delivery service

Cloud applications

Transportation

Facilities Management

And many, many more

MAKE THE RELATIONS BETWEEN VENDORS AND SERVICES

STEP 3

TIP 5 Start on the categorization as data on each business is likely to be different, regardless in the organization (better buy-in process)

Vendor 1 Vendor 2 Vendor 3 Vendor 4 (...) Vendor n

Service 1 Service 2 Service 3 Service 4 Service 5

VERIFY THE NEED FOR CREATING VENDOR RISK PROFILES

STEP 4

TIP 6 Filtering criteria should be transparent in the organization. No exceptions.

Vendor 1 Vendor 2 Vendor 3 Vendor 4 Vendor 5 Vendor 6

CREATE A VENDOR RISK PROFILE (SUMMARY)

STEP 5 EVALUATE RISK

Completed Risk Profiles

Axis: Risk Level (0 to 100)

Axis: Vendor Count (0 to 100)

RECOMMENDATION

STEP 6

GAPS AND FINDINGS MANAGEMENT

STEP 7

Vendor Check

Initial Register

Planned

Periodic review

ANALYSIS

GAPS MANAGEMENT

RISKS MITIGATED, HIGHER CMMI

RISKS MITIGATION TO IDENTIFIED FINDINGS (PROBABILITY/IMPACT MATRIX)

STEP 8

Very High High Medium Low Very Low

Very Low Low Medium High Very High



03

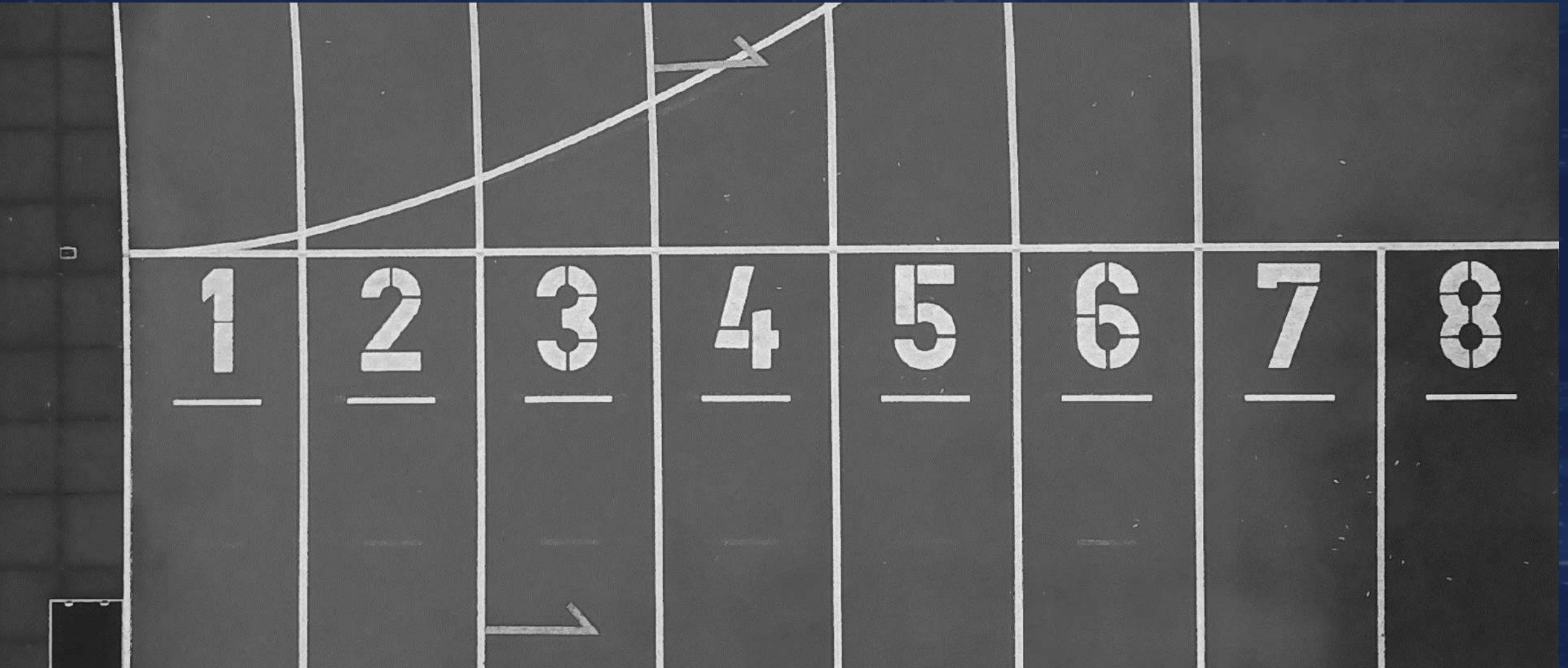
*Case study -
why should
you know your
Vendors?*



CASE STUDY

03

Case study - why
should you know
your Vendors?



Battle of Britain 1940



CASE STUDY – BATTLE OF BRITAIN - 1940

03

Case study - why
should you know
your Vendors?

IN A NUTSHELL



**BATTLE OF
BRITAIN**
10 JULY – 31 OCTOBER 1940



Those who stood with us

A total of **2937** aircrew took part:



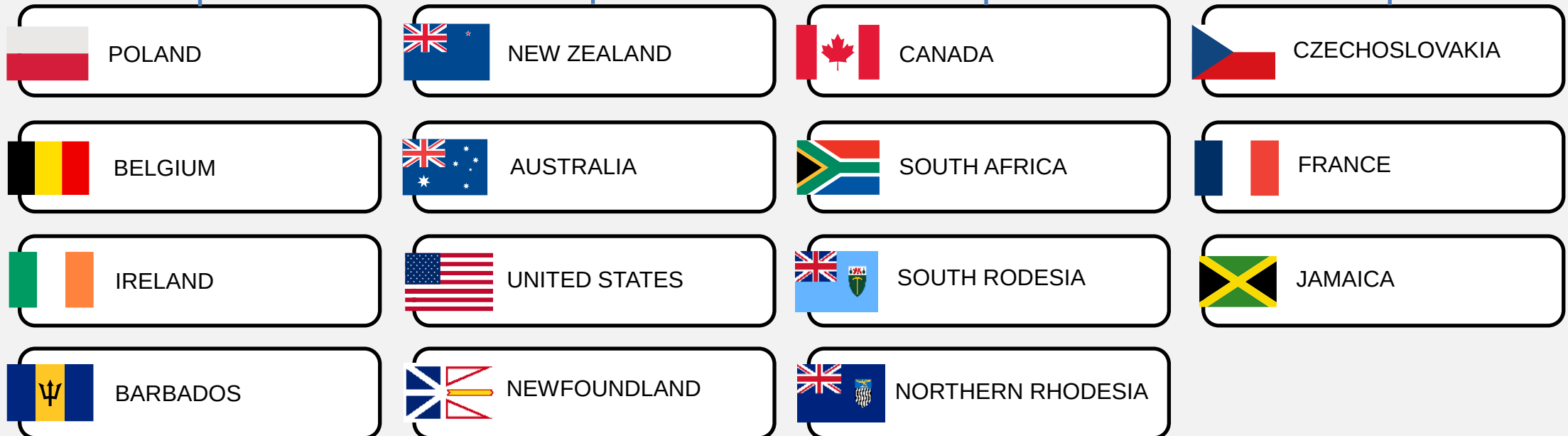
BATTLE OF BRITAIN - VENDOR RISK PROFILE AND ASSESSMENT

03

Case study - why
should you know
your Vendors?

STEP 1: Create / Consolidate list of Vendors

VENDORS FROM 15 COUNTRIES



BATTLE OF BRITAIN - VENDOR RISK PROFILE AND ASSESSMENT

03

Case study - why should you know your Vendors?

STEP 2: Create a list of services that you consider relevant to your organization

SERVICE:



Fighter Pilots (FP)



Bomber Pilots (BP)



BATTLE OF BRITAIN - VENDOR RISK PROFILE AND ASSESSMENT

03

Case study - why
should you know
your Vendors?

STEP 3: Make the relations between Vendors and Services

VENDOR:



Poland

SERVICES:



88 Fighter Pilots (FP)



57 Bomber Pilots (BP)



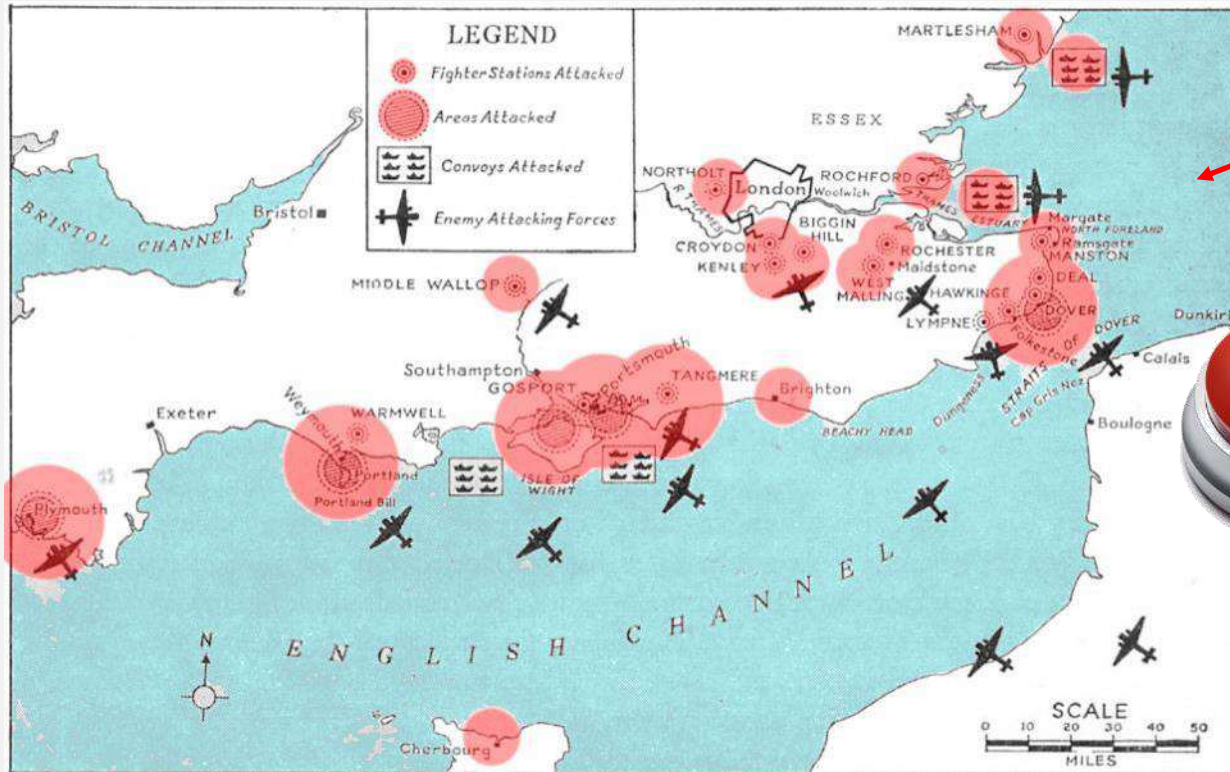
BATTLE OF BRITAIN - VENDOR RISK PROFILE AND ASSESSMENT

03

Case study - why should you know your Vendors?

STEP 4: Verify the need for creating Vendor Risk Profiles

IS THIS SERVICE IMPORTANT FOR US?



STEP 5: Create a Vendor Risk Profile

VENDOR RISKS PROFILES



Vendor Risk Profile (Polish Pilots):

- ☒ They do not know British combat tactics
- ☒ They do not have experience with modern planes (Hurricanes, Spitfires)
- ☒ Insufficient command of English



STEP 5: Create a Vendor Risk Profile

VENDOR RISKS PROFILES



Vendor Risk Profile (Polish Pilots):

- ☒ They do not know British combat tactics
- ☒ They do not have experience with modern planes (Hurricanes, Spitfires)
- ☒ Insufficient command of English
- ☒ Too eager to fight with the enemy ...



**Bandits! Bandits! Beneath us!
On the right!**

BATTLE OF BRITAIN - VENDOR RISK PROFILE AND ASSESSMENT

03

Case study - why
should you know
your Vendors?

STEP 6: Check the vendor compliance and assess risks using a self-assessment

ASSESSMENT (DURING THE BATTLE).

Extremely Good Pilots

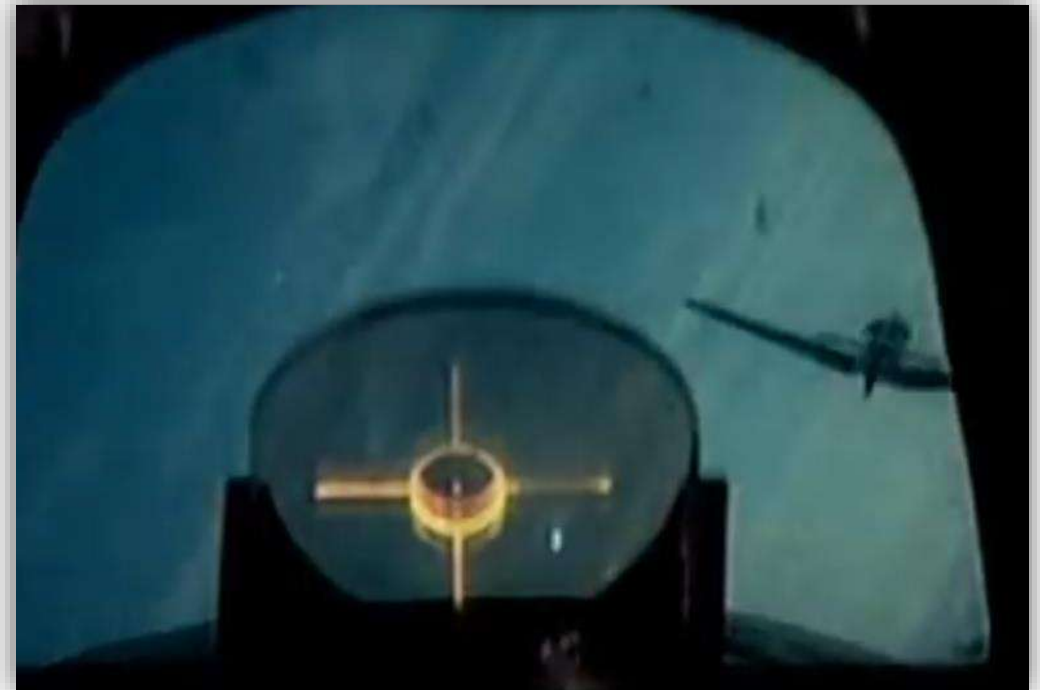
Broad battle experience

Direct fight tactics better than expected **(5 to 1)**

Incredibly efficient



On the first mission of the 303 Squadron, **six** enemy fighter planes were shot down. In 15 minutes.



BATTLE OF BRITAIN - VENDOR RISK PROFILE AND ASSESSMENT

STEP 7: GAPs and Findings management

STEP 8: Risks Mitigation to identified findings

03

Case study - why
should you know
your Vendors?

NOT REQUIRED, LET THEM FLY



BATTLE OF BRITAIN - VENDOR RISK PROFILE AND ASSESSMENT

03

Case study - why
should you know
your Vendors?



*„Never in the field of human conflict
was so much owed
by so many to so few”*

Winston Churchill

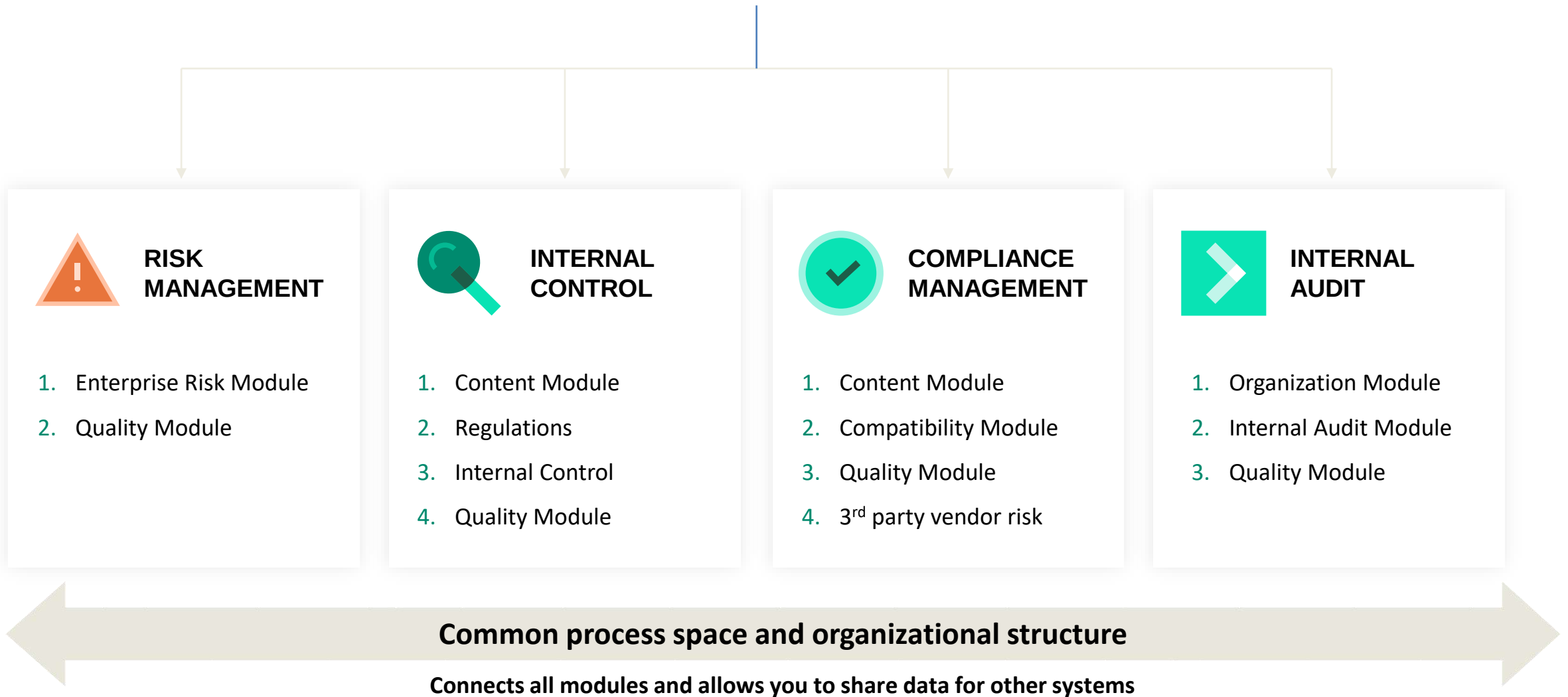
04

Summary

START SMALL AND GROW



ADAPTIVE GRC



RISK MANAGEMENT

1. Enterprise Risk Module
2. Quality Module

INTERNAL CONTROL

1. Content Module
2. Regulations
3. Internal Control
4. Quality Module

COMPLIANCE MANAGEMENT

1. Content Module
2. Compatibility Module
3. Quality Module
4. 3rd party vendor risk

INTERNAL AUDIT

1. Organization Module
2. Internal Audit Module
3. Quality Module

Common process space and organizational structure

Connects all modules and allows you to share data for other systems

Our Special Offer for Audit Masters 2026



PROMO CODE

AdaptiveGRC_AuditMasters

Try
AdaptiveGRC
today with our
limited-time offer

Free internal audit training

(GRC tool usage)

3 months free access to Internal
Audit module (up to 3 users)

- Feel free to forward the QR code to friends and colleagues.
- Scan the QR code to sign up and discuss details or visit us at our booth.

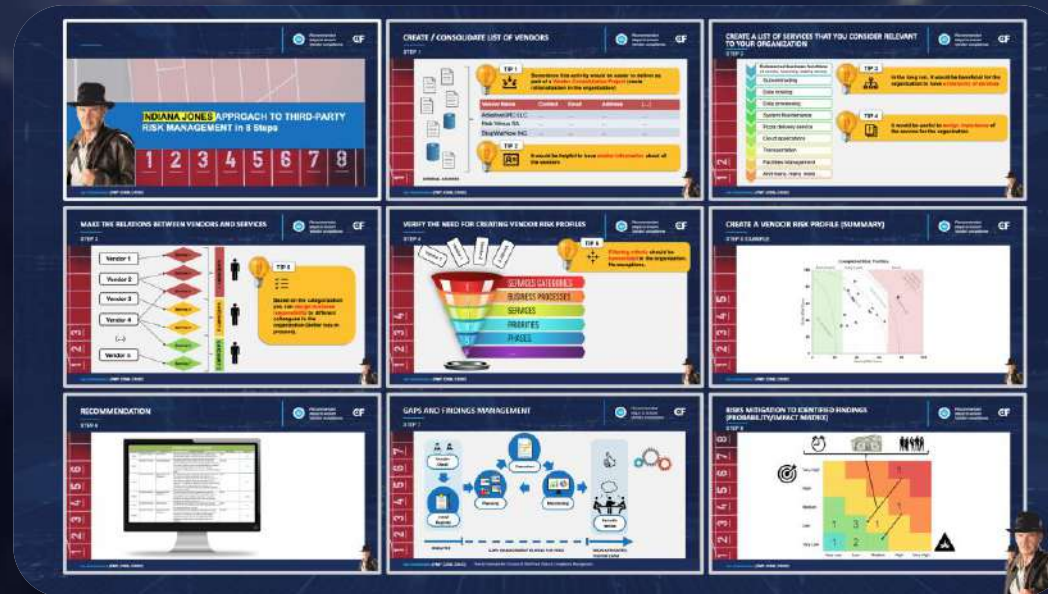


SIGN UP VIA
QR-CODE



Offer valid until June 30, 2026

Do You Know the Path?





**THERE'S A DIFFERENCE
BETWEEN KNOWING THE PATH**



THANK YOU!

04

Summary



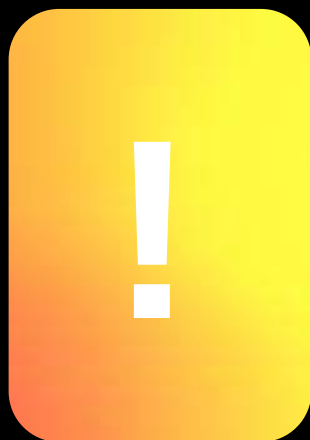
**Thank You
For Your
Attention**

Thank you for your attention!



Jan Anisimowicz
Board Member, C&F SA Poland
AdaptiveGRC product

Jan.Anisimowicz@candf.com



BYE [] BYE