

ISSA Symposium 17

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Practical Application of Technology to Solve Regulatory Challenges



Who is here today



- Vice President and Partner with Strategy&, formerly Booz & Company
- Leads the Financial Services Fit for Growth practice for Strategy&
- Over 15 years of experience, focused on large scale business transformations spanning both operations and technology
- Relevant experience meeting regulatory requirements, most recently working with DTCC and six banks to stand up a consortium to offer a central, standard solution to KYC/AML and FATCA



- Vice President and Partner with Strategy&, formerly Booz & Company
- Leads the Enterprise Architecture practice for Strategy&.in North America, which includes the data and analytics
- Over 30 years of experience, focused on technology-driven business transformation, primarily in financial services
- CEO/President/Founder of five software and services companies
- Designed the payment and securities settlement and clearing systems for seven central banks

Regulatory change – do companies feel ready?

Solutions are multi-faceted, implementing one is not enough

That's a lot... but there are success stories

Regulatory change is a pressing issue – it's not just the knowns, but the changing nature driving uncertainty

Existing regulations

Basel II

Dodd Frank

AIFMD

FATCA

UCITS

KYC/AML

Up-coming regulatory changes

Basel III

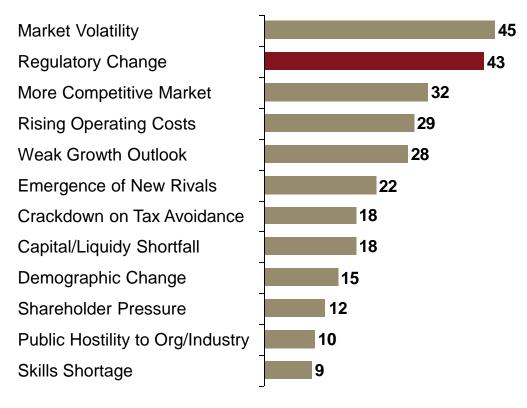
MiFID II

Solvency II

EMIR

G20 Financial Transactions Tax

Which of the following issues will likely be the most pressing for your organization in the coming two years?



Sources: Sunguard Financial Systems: Regulatory Pressure Cooker Compliance in the Boardroom (2014); Strategy& analysis

Organizations are scrambling to comply, managing both direct and indirect impacts

Direct Impact

Transparency & Reporting



- Enterprise view requires data & technology integration, e.g.,
 - DFA stress tests & CCAR
 - -FATCA
 - -Basel II/III

Liquidity



- Capital & liquidity limits require enhanced modeling, e.g.,
 - -DFA
 - -Basel II / III
 - -SEC Rule 2a-7

Globalization



- Global as well as local rules drive complexity, e.g.,
 - -KYC/AML
 - -FATCA

Indirect Impact

Cost Reduction



- Compliance spend and capital needs increase cost pressure, e.g.,
- -Compliance ~\$50B by 2015
- -IT costs 6.9% CAGR 2014-17

Lost Business Focus



 50% of executives say regulatory pressure is impinging their ability to do business

Enterprise Wide Implications



 Requires coordinated response across traditionally siloed business units, functions and regions, optimizing resources and initiatives

Sources: Sunguard Financial Systems; IDC; Strategy& analysis

The impact on technology and data is significant, with a need for rapid reaction to change driving increasing investment

Common challenges

"Our data is distributed across regions, functions & systems – how do we rapidly get an enterprise view?"

"Technology is aging and not integrated – how do we meet reporting & compliance while maintaining cost?"

"Evolving reforms have already overburdened systems and organizations ... what technology innovation would help relieve this stress?"

"Increasing adoption of mobile and real time escalates regulatory oversight... what is the optimal way to manage delivery?"

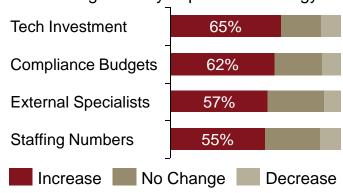
Source: Sunguard Financial Systems; Strategy& analysis

Technology must evolve and be designed to evolve The groundwork for the emergence of a new business and IT paradigm

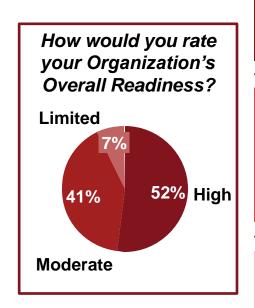
- Enterprise view of risk, return, cost and asset quality
- · Common enterprise data taxonomy
- Real time platforms & analytics
- Fit for purpose infrastructure for transparency & resiliency

Technology requires the greatest investment

Regulation causes business to change – but also significantly impacts technology



Do companies feel ready? Some... but challenges remain for management, infrastructure and staff



Leadership is stretched thin...

80%

C-suite executives face significant stress due to fear of damage to firm and personal reputation and the overhaul in IT and operations

63%

Firms anticipate significant change in the leadership team (size, responsibilities, etc.)

... Infrastructure requires significant change...

80%

Capital Markets firms plan to enhance compliance development, e.g.,

- Outsourcing QA/testing of compliance IT development
- · Cloud-based regulatory reporting
- Big data to identify compliance breaches

...and talent is running short

11%

Rise in salaries for regulatory roles due to talent shortage; firms are meeting short term needs with external support

68%

Adopting a holistic approach via integrated governance, risk and compliance programs

Source: Sunguard Financial Systems: Regulatory Pressure Cooker Compliance in the Boardroom (2014); CEB, Robert Half, PwC, Strategy& Analysis

Regulatory change – do companies feel ready?

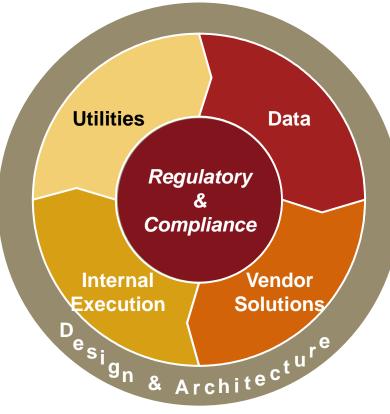
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Solving for Regulatory and Compliance challenges requires a multi-faceted approach to IT

Vendors are not the only third party solutions – emerging utilities take on un-differentiating tasks to meet regulatory needs

Execution is critical – optimize organization, methodologies and technologies to execute technology-driven transformations



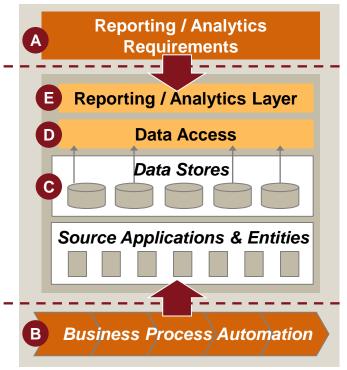
Design for flexibility – how you architect now helps you meet continued change Determining data needs once – enterprise view to fulfill multiple regulatory requirements

Buy versus build – vendor solutions can be leveraged to support regulatory and compliance functions

Integrated requirements and a common taxonomy enable enterprise reporting without heavy data transformation

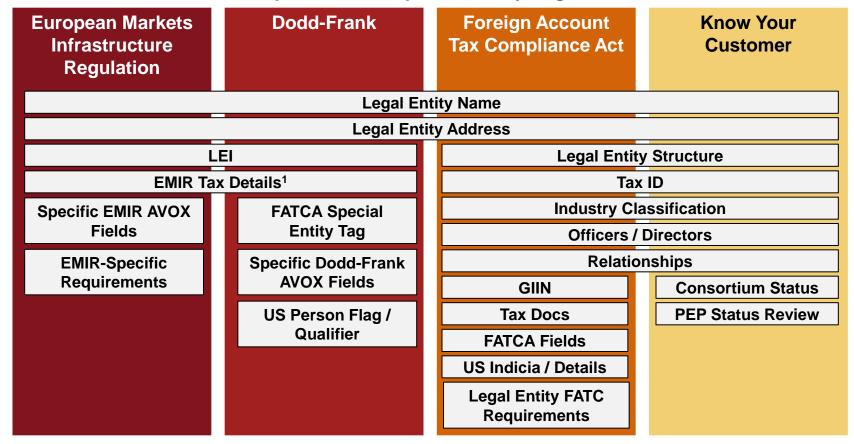
From 2014-2015, Financial institutions will increase spend on data management by 17% from US \$7.5B to US \$8.9B. Spend on analytics is considerably higher – growing by 12% from US \$10.7B to US \$12B

- A Enterprise reporting (e.g., KYC / AML / FATCA for customers spanning assets, markets and jurisdictions)
 - Enterprise reporting and analytics to fulfill regulatory requirements, with potential for additional revenue opportunities
 - Data access is enabled through enterprise taxonomy standards, e.g., APIs connect local data stores and central reporting
 - Integrating data is onerous and expensive a federated approach is recommended with local management of data definitions and quality
- B Data is ever increasing driven by process automation, digitization and market needs (e.g., mobile, real-time)



Viewing data requirements holistically reduces effort – up to 80% of data may be common across regulations

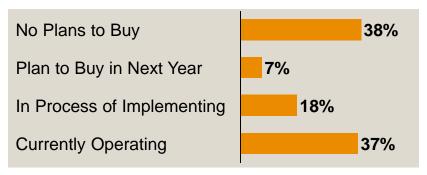
Sample of Data Requirements by Regulation



¹⁾ Data entities are partially shared between regulatory requirements Source – Strategy& Analysis, Marc Murphy FIMA Video (Fenergo, 2/27/2014)

Firms are looking to 3rd parties for integrated solutions to address governance, risk and compliance challenges

Adoption of Governance, Risk and Compliance (GRC) Systems by Banks (2012)



- Interest is growing rapidly survey in 2011
 showed 50% had no interest in a GRC system
- In 2015, financial institutions are projected to spend \$1.4B on GRC software
- Banks face a choice update complex, aging custom solutions or leverage integrated solutions offered by 3rd party vendors

Sample of Leading GRC Vendors for Financial Services

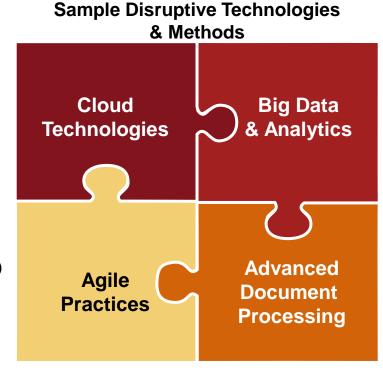
Туре	Sample Vendors
Data Management	Goldensource, PolarLake, Smartstream, Informatica
GRC Systems	Oracle Fusion, IBM OpenPages, Nice Actimize, SAS® Enterprise GRC, SunGard Ambit Operational Risk, Wolters Kluwer ARC Logics
KYC/AML/ FATCA	Strevus, Fenergo, CTI, KYCnet, KPMG
Other	Recognos, Pega, Alacra

Source – Strategy Analysis, FSO Knowledge Xchange: Regulations Drive IT Spending in Financial Services (2013), American Banker: Banks' Risk Tech Spending Expected to Grow Steeply Through 2017 (1/9/2014), Operations Risk & Regulation: Compliance Software Rankings in 2012, RiskTech 100 2014, Forrester Research

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Firms should explore leading technologies and practices to improve IT delivery efficiency and effectiveness

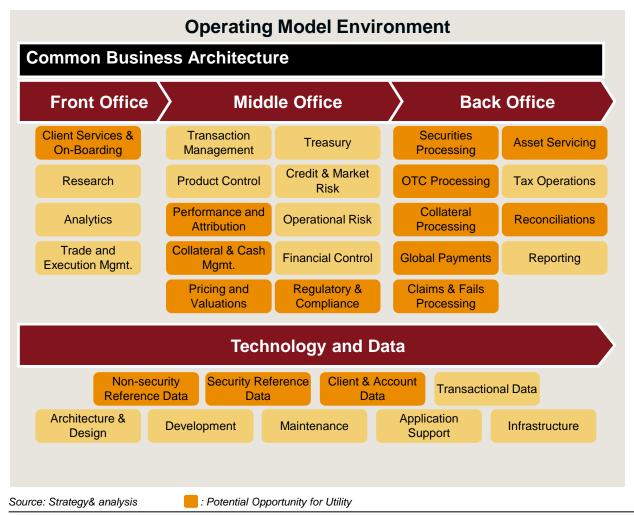
- "Cloud" is fundamentally scalable, virtualized and standard IT delivery
 - **Cost Savings**: 20-60%
 - Scalability: capacity in minutes, not weeks
 - Ease of maintenance
- Market \$76.9B in 2010 to \$210B in 2016 – 63% of financial institutions
- Small, cross-functional teams ("scrums") with incremental delivery in iterations ("sprints")
 - Faster time to market:70% reduction
 - Business Collaboration
 - Flexibility
- 52% usage, with 35% relying on hybrid methodologies to meet regulatory & audit



- Discovers & predicts across disparate sets of structured & unstructured data
 - Risk Analytics
 - Operational: real time data aggregation
 - Monetization
- Building in house & via partnerships, e.g., Thomson Reuters, DowJones, Citigroup
- OCR with automated data extraction and evidencing from documents
 - Cost Savings: 70% doc scanning costs labor
 - Evidencing
 - Throughput
- Market advancing from doc management to processing
 - new vendor landscape

Source – Strategy& Analysis, Gartner: Public Cloud Services, 2011-2016, (2/8/2013), Financial Times: Regulation: IT stands to play bigger role as compliance rules tighten (9/17/2013), CPrime: Agile Adoption by the Financial Services Industry, Forrester: Q3 2009 Global Agile Adoption Online Survey, Version1: State of Agile Survey (2013)

The emergence of industry utilities are enabling firms to meet new client and regulatory demands in an efficient manner



- Industry "utilities" are on the rise – traditional role is expanding beyond back office to middle and front
- Banks see increasing value – consolidating non differentiating capabilities into an industry standard to support regulatory needs (e.g., EMIR, KYC/AML, FATCA)
- Recent examples
 - DTCC's GTR
 - Swift KYC Registry (2014)
 - Client Reference Data Consortium ("CReD")

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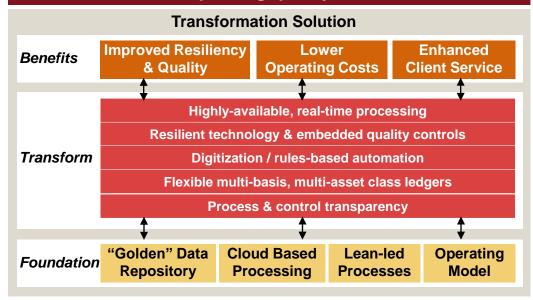
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Case Study #1: Global Custodian Bank

Context: technology-driven transformation to significant reduce cost while improving quality and service



- End-to-end STP and real-time data capabilities
- Delivered \$400M-600M in cost reduction over ~5 years
- Highly resilient with customizable embedded quality controls
- Enables day-to-day transparency into regulatory, contractual, policy and procedural process controls

Internal Compliance

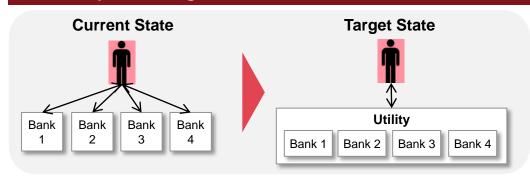
- A control framework to facilitate fast changes to accommodate changing compliance needs
- Aggregated and dynamic reporting, enabled by automation and enhanced data management

Additional Opportunities

- Innovative capabilities for clients including real-time data, risk transparency, analytics, and flexibility to service any asset class and fund structure globally
- Parallel opportunity to offer fullservice client onboarding and reporting, leveraging data transformation from effort

Case Study #2: Client Reference Data Utility

Context: Deliver a trusted source of standardized data and processing for FATCA and KYC



- A single trusted source of standardized data based on industry agreed validation rules and controls
- Regulatory compliance through provision of data focused initially on FATCA, Dodd-Frank and KYC
- Standard document management and controlled delivery to all counterparties
- User-governed solution that adapts to industry change
- Innovative data services with functionality focused on secure permissioning, digitization, cleansing, and a validation
- High availability via scalable platform 24/6.5, supported by experts with deep knowledge

Mission

- Drive the industry's call for a comprehensive, global, standardized platform to collect and manage client reference data
- Create a solution that increases control and data security while reducing operational complexity for all industry participants through standardization and digitization











The entire company must be committed – organize at an enterprise level and drive new behaviors

Eight Success Factors for Regulatory Change

Top Management Fully Committed (Senior level ownership – managing program and establishing governance) Management **System** Strategic view of Regulatory **Organization Engagement** (compliance, cost-saving & revenue generation) (talent availability, accountability, incentives) **Enterprise-wide Program Office to Drive Change** (alignment to strategic goals, financial accountability, and coordination with other enterprise initiatives) Comprehensive Regulatory Roadmap to deliver Early and Long Term Change Operating (regulatory reforms timelines & milestones, identification of most critical implementation challenges, **System** prioritization & planning of individual work streams / initiatives) Enterprise Transparency (reporting & analysis across all regulatory aspects, to a broad set of stakeholders including technology, operations, customer experience and front office) 7 Active Participation & Ownership of Staff in the Program (ownership balance between LoBs, centralized compliance function and program) Culture Change 8 **New Behaviors and Mindset Systematically Developed**

(driven by enumeration & performance and talent development & succession planning)

THANK YOU