

## Strategic Initiative: Risk Management

### Strategic Measure: Compliance Program Maturity Assessment

Target an increase of one point by FY 2021-22, from the baseline set in FY 2017-18 of 2+ score

STATUS	INITIATIVES	Q2 UPDATES
	<b>Build Risk-Specific Mitigation Plans</b>	
75%	<ul style="list-style-type: none"> <li>Continue to strengthen and enhance oversight of the conflict of interest rules</li> </ul>	<ul style="list-style-type: none"> <li>Revised and streamlined proposed changes to the Conflicts of Interest Code.</li> <li>Implemented an enhanced onboarding for key positions with additional training and guidance about conflict rules and scenarios.</li> </ul>
50%	<ul style="list-style-type: none"> <li>Outline relevant controls and provide implementation guidance for top compliance risks</li> </ul>	<ul style="list-style-type: none"> <li>Enhanced the oversight and reporting of Personal Trading rules.</li> <li>Implemented a new onboarding and exit clearance process.</li> </ul>
	<b>Manage Third-Party Risk</b>	
50%	<ul style="list-style-type: none"> <li>Establish a standardized process for third-party risk management</li> </ul>	<ul style="list-style-type: none"> <li>Transitioned Placement Agent Disclosure process and reporting function from INVO.</li> <li>Developing enterprise-level process for third-party risk management for outside vendors/consultants.</li> </ul>
50%	<ul style="list-style-type: none"> <li>Segment third parties by level of risk</li> </ul>	<ul style="list-style-type: none"> <li>Process being developed to assess contract risk level.</li> </ul>

### Strategic Measure: Compliance Employee Awareness Survey

Target maintaining a 90 percent or greater positive response rate to the compliance survey question through June 2022, from the baseline set in FY 2017-18 at 87 percent

STATUS	INITIATIVE	Q2 UPDATES
	<b>Measure Compliance Training Effectiveness</b>	
75%	<ul style="list-style-type: none"> <li>Evaluate appropriateness of compliance training (e.g., relevance to job, depth, delivery mechanisms, etc.)</li> </ul>	<ul style="list-style-type: none"> <li>Increased training offerings and delivery mechanisms to support the virtual environment. Conducted post training surveys to gain feedback for enhancing future sessions.</li> </ul>

Status Legend

■ On-Target

■ At-Risk

■ Off-Target