Schedule 2 – to be completed by all authorised firms.

Ref No.	Question:	Response (Check appropriate box)	Why is your firm not in compliance with this requirement?	What is your firm doing, or intending to do, to bring itself into compliance with this requirement?
3.1.2	Is every member of the governing body an individual who is approved to exercise either the executive governance function or the non-executive governance function?	Yes	N/A	NA
3.1.3	Does every independent non-executive member of the board meet all of the eligibility requirements set out at CTRL 3.1.3(1)?	Yes	Yes	
3.1.4	Does the governing body have responsibility for approving and overseeing the implementation of the firm's strategic objectives, corporate governance framework and corporate culture?	Yes	NA	NA
3.1.5	A governing body cannot relieve itself of an obligation under the CTRL Rules by repudiating the obligation or allocating it to another person or body – is this rule observed?	Yes	NA	NA
3.1.6(2)	Has the governing body given the senior executive function a written document that sets out his or her responsibilities?	Yes	NA	NA
3.1.6(2)	Has the senior executive function acknowledged, in writing, having received that document, and confirmed in the acknowledgement that he or she understands, and undertakes to carry out, those responsibilities?	Yes	NA	NA

3.1.6(4)	Has the senior executive function given to each individual who exercises a controlled function for the firm a written document that sets out that individual's responsibilities and in line with CTRL 3.1.6(11)[1]?	Yes	NA	NA
3.1.6(5)	Has the senior executive function obtained the governing body's approval (or the approval of the body's audit committee, if any) in relation to the content of the document given to the individual who exercises the internal audit function[2]?	Not Applicable	To ensure financial oversight, we have a regional audit team that conducts local audits. Reports are presented to local management and the governing body in a timely manner.	
3.1.6(6)	Has the senior executive function consulted with the governing body (or the body's risk committee, if any) in relation to the content of the document given (pursuant to CTRL 3.1.6(4)) to the individual who exercises the risk management function[3]?	Not Applicable	We don't have a dedicated local risk committee, but regional risk committee oversees us. Local management and the governing body are promptly informed of any risk-related issues.	
3.1.6(8)	Has each individual who has received a written document pursuant to CTRL 3.1.6(5) acknowledged, in writing, having received that document, and confirmed in the acknowledgement that he or she understands, and undertakes to carry out, those responsibilities?	Yes	NA	NA
3.1.7(a)	Is the governing body satisfied that it has access to sufficient information and independent advice about the firm's affairs to make informed decisions and discharge its responsibilities effectively?	Yes	NA	NA
3.1.10	Has the governing body put in place a code of conduct or code of ethics for all employees that defines acceptable and unacceptable behaviour, and reminds them not to engage in illegal activity?	Yes	NA	NA

3.1.11	Has the governing body put in place a written document setting out its own governance structure?	Yes	NA	NA
3.1.12(e)	Has the governing body approved the organisational structure and corporate governance framework through which the firm is managed and controlled?	Yes	NA	NA
3.1.12(f)	Has the governing body ensured that the firm has succession plans for its key functions?	Yes	NA	NA
3.1.12(g)	Has the governing body established direct and independent contact with the firm's internal audit function?	Not Applicable	NA	NA
3.1.12(g)	Has the governing body established direct and independent contact with the firm's risk function?	Not Applicable	NA	NA
3.1.12(h)	Has the governing body ensured that the firm has effective policies, procedures and controls to deter, prevent, detect, report and remedy fraud, and ensured that appropriate resources are allocated for that purpose?	Yes	NA	NA
3.1.14(1)(a)	Has the governing body approved strategic and business plans appropriate to the nature, scale and complexity of the firm's business?	Yes	NA	NA
3.1.14(1)(b)	Are the strategic and business plans required at CTRL 3.1.14(1)(a) reviewed and if necessary updated periodically?	Yes	NA	NA

3.1.15	During the past year, have all decisions about the appointment, remuneration, disciplining or dismissal, or the assessment of the performance of the individuals cited in Rule 3.1.15 been made in accordance with that rule?	Yes	NA	NA
3.1.16(1)	Has the governing body established, for itself and the whole firm, a remuneration policy appropriate to the nature, scale and complexity of the firm's business?	Yes	NA	NA
3.1.16	Does the remuneration policy required under CTRL 3.1.16(1) meet all the requirements set out at CTRL 3.1.16?	Yes	NA	NA
3.1.17	Is the governing body responsible for overseeing an effective approach to operational resilience and business continuity to enable the firm to continue or restore its operations in the event of a disruption.	Yes	NA	NA
3.1.18(1)	Has the governing body ensured that the firm's corporate governance framework, and of its risk management framework, is designed: a) to avoid conflicts of interest (or to mitigate such conflicts if it is not possible to avoid them); and b) to deal effectively with any conflict of interest that arises?	Yes	NA	NA

3.1.18(2)(a)	Does the firm's corporate governance framework, and of its risk management framework require that any conflict of interest that arises must be reported: a) to the firm's senior management, or, if the firm is a branch, to the body that is responsible for the branch; and b) if it is not addressed within a reasonable time by the senior management, to the firm's governing body?	Yes	NA	NA
3.1.18(2)(b)	Has the senior management given the governing body, every 6 months, a written summary of all conflicts of interest addressed by the senior management during the period?	No	Although we have a conflict of interest policy established, we are pleased to report that there were no incidents necessitating disclosure to the governing body this year.	NA
3.1.19	Has the governing body put in place arrangements to ensure that the firm's corporate governance framework and risk management framework are reviewed at least once every 3 years by either the firm's internal auditor or an independent and objective external reviewer [4]?	Yes	We have established processes to ensure that the firm's corporate governance framework and risk management framework are reviewed at least once every three years.	NA
3.1.20	Has the governing body of the firm (and each committee of the governing body where applicable) maintained appropriate records of its deliberations and decisions, sufficient to show that the body or committee is effective and has carried out its responsibilities?	Yes	NA	NA
3.1.21	Is the governing body satisfied (taking specific account of the measures at CTRL 3.1.21(2)) that each employee to whom a responsibility is allocated within the firm's internal controls framework is sufficiently free from influence for the framework to be effective in achieving its purposes?	Yes	NA	NA

3.3.13 (c)	Does the Risk committee receive regular reports about the firm's risk profile, measurement against the approved risk appetite and risk limits; and any limit breaches and actions taken as a result of such breaches?	Not Applicable	Please be informed that, as a Category B firm, there isno obligation for us to establish a risk committee	NA
6.4.3 (2)	Has the firm established an internal audit function that provides independent and objective assurance on the effectiveness of risk management, internal control and governance processes?	Not Applicable	To maintain financial oversight, we have a regional audit team that performs local audits, and the findings are promptly reported to local management and the governing body.	NA
7.1.3	Does the firm have a documented risk management framework approved by the governing body?	Yes	The risk management framework consists of suitable strategies, policies, procedures, and controls designed to manage various types of material risks in accordance with CTRL 7.1.2. This framework also provides the firm's governing body with a comprehensive overview of material risks across the organization.	NA
7.1.3 (2)	Does the risk management framework comprise of appropriate strategies, policies, procedures and controls to identify and manage different types of material risks as per CTRL 7.1.3, and provide the firm's governing body with a comprehensive firm-wide view of material risks?	Yes	The risk management framework complies with the requirements outlined in 7.1.2(5)	NA

7.1.3 (5)	Does the risk management framework reflect the firm's business objectives and the business plan approved by the firm's governing body, and meets the requirements under 7.1.3(5)? The framework must include: a. a risk appetite statement; b. a risk management strategy; c. a risk management function dedicated to the framework; d. a Business Continuity Plan ("BCP") e. a management information system to support the effectiveness of the framework; and f. a robust review process to ensure that the framework remains effective g. for a banking business firm, or an Islamic banking business firm, an internal capital adequacy assessment process (or ICAAP) required under BANK or IBANK; h. for a QFC insurer (other than a QFC captive insurer or a QFC insurer that is a branch), an own risk and solvency assessment (or ORSA) required under PINS	No	At the local level, we do not conduct an annual review of the risk management strategy; however, at the regional level, it is reviewed on a quarterly basis.	NA
7.1.6 (4)	Is the risk management strategy documented in writing and -kept up to date to take into account new internal and external circumstances ?	Yes	Since senior management are also employees, they engage in the company's training programs covering various risk types.	NA
7.1.8	Has the firm's senior management ensured that appropriate risk management training is available to individuals at all levels throughout the firm?	Yes	Since senior management are also employees, they engage in the company's training programs covering various risk types.	NA
8.2.2(2)	Does the firm have documented operational risk ("OR") framework that has been integrated into the risk management framework and includes governance arrangement for oversight of operational risk; monitoring, analysis and reporting of operational risk events; and internal controls that are designed and used effectively for the management of operational risk?	Yes	NA	NA

8.2.3 (1)	Does the operational risk framework include a process for managing changes in its products, activities, systems, markets, locations and jurisdictions (OR change management process)?	Yes	NA	NA
8.2.3 (2) (a) & (b)	Does the firm's OR change management process include process for: identifying, managing, challenging, approving, and monitoring change on the basis of objective criteria; and ensure that operational risk arising from changes is promptly identified, assessed and managed?	Yes	NA	NA
8.2.3 (2) (c)	Is the firms' OR change management process subject to independent and regular review and update?	Yes	NA	NA
8.2.4	Does the firm, from time to time, prepare operational risk reports for the governing body for the purposes of monitoring, analysis and reporting required under rule 8.2.2 (2) (b)?	Yes	NA	NA
8.3.3	Has the firm implemented an operational resilience approach that aligns to its corporate governance and operational risk framework?	Yes	NA	NA
8.3.4	Has the firm identified its critical operations and determined the systems, infrastructure and resources needed to support each operation in accordance with 8.3.4(2)?	Yes	NA	Our critical businesses and corporate functions maintain business resiliency plans (BRPs) with specific provisions for colleague mobilisation, alternate workspaces, and communication with clients and critical third parties. These BRPs are created based on a BIA that identifies business priorities based on time sensitivity and their associated recovery requirements.
8.3.4 (3)	Has the governing body reviewed and approved all operations identified as critical in the last year?	Yes	NA	NA

8.3.5 (3)	Has the firm implemented in relation to each critical operation, an impact tolerance that has been approved by the governing body?	Yes	NA	Each processes undergoes a business impact assessment to confirm the necessary recovery time objective.
8.3.5 (4)	Has the firm ensured that it can remain below its impact tolerance for each critical operation in the event of a severe but plausible disruption?	Yes	NA	As part of the annual testing of our business resilience plan, the firm confirms that it can recover and continue its critical processes within the defined recovery time objective.
8.3.6 (1)	Has the firm identified the resources and processes needed to deliver each critical operation in accordance with the requirements of 8.3.6 (2)?	Yes	NA	For each critical process, there is an identified dependency on sites, applications, colleagues, vendors, resources and internal teams.
8.3.7	Has the firm periodically tested its ability to remain below its impact tolerances and carry on critical operations in the event of a severe but plausible disruption (scenario testing) in accordance with the requirements of 8.3.7 (1)?	Yes	NA	NA
8.3.7 (2) and (3)	Has the governing body of the firm reviewed the results of all scenario testing of critical operations and in cases where impact tolerance are breached, approved a remediation plan as required to be developed under 8.3.7 (3) (b)?	Not Applicable	NA	NA
8.3.8	Has the firm developed in writing disaster recovery plans and procedures that is integrated into the firm's operational risk framework and aligned to the firm's operational resilience approach, risk appetite and impact tolerances to manage incidents that disrupt, or that may potentially disrupt, the firm's critical operations?	Yes	NA	NA
8.3.8 (5)	Has the incident management, response and recovery procedures reviewed and tested periodically?	Yes	NA	NA
8.4.4	Does the firm have a policy for managing material outsourcing arrangements (outsourcing policy) approved by the governing body?	Yes	NA	NA

8.4.4 (4)	Has the governing body reviewed the outsourcing policy and procedures once in the last two years in accordance with 8.4.4 (a) and (b).	Yes	NA	NA
8.5.2	Does the firms operational risk framework include policies, processes, and procedures for managing ICT and information security risks in accordance with the requirements of 8.5.2 (1)?	Yes	NA	NA
8.5.3	Does the firm have a written ICT strategy that is aligned to its business strategy?	Yes	NA	NA
8.5.4	Has the firm implemented an ICT project management process and ICT change management process in accordance with the requirements of 8.5.4?	Yes	NA	NA
8.5.4 (4) (c)	Have the firm's ICT project and change management processes been subject to independent and regular review and update?	Yes	NA	NA
8.5.5	Does the firm have an information security policy that's sets out the high-level principles to protect the confidentiality, integrity and availability of data and information belonging to the firm and its customers?	Yes	NA	NA
8.5.5.(2)	Does the information security policy incorporate the requirements of 8.5.5 (2)?	Yes	NA	NA
8.5.5 (3)	Does the firm mitigate the ICT and information security risks that it is exposed to and impact its ability to meet its information security policy?	Yes	NA	NA
8.5.5 (4)	Has the governing body of the firm approved the firm's information security policy and any mitigation of ICT and information security risks as required under 8.5.5 (3)?	Yes	NA	NA

8.6.2 (1) and (2)	Does the firm have a robust BCP that includes processes and procedures necessary to keep its critical operations below the firm's impact tolerances through severe but plausible disruptions?	Yes	NA	We maintain a robust business resiliency program to mitigate the risk of disruption of loss of services or loss of data, even in the event of a disaster. The Business Resiliency Management (BRM) framework and the policy and procedures that underpin it are consistent with the key elements of the International Organisation for Standardisation (ISO) 22301 standard, which provides a framework to plan, establish, implement, operate, monitor, review, maintain, and continually improve a business continuity management system.
8.6.2 (3)	Is the firm's BCP written and integrated into its operational risk framework and aligned to its operational resilience approach and does it meet the requirements of 8.6.2 (3)?	Yes	NA	NA
8.6.3(1) and (2)	Has the governing body approved the firm's BCP and ensured that the BCP is periodically reviewed and tested?	Yes	NA	NA
8.6.3 (3)	Does the governing body ensure that the firm's BCP is reviewed: annually by the firm's internal audit function or an independent external reviewer; and every 3 years by an independent external reviewer?	Yes	NA	NA