Operational Resilience

A new module from HKMA

On 31 May 2022, the HKMA released the new Supervisory Policy Manual (SPM) module OR-2 on Operational Resilience. SPM OR-2 aims to set out HKMA's approach and supervisory expectations on operational resilience by providing guidance on the general principles that authorized institutions (Als) should consider when building their operational resilience.





According to the HKMA, "Operational disruptions (including those due to pandemics, cyber incidents, technology failures and natural disasters) can affect the viability of individual financial institutions, and in turn, the stability of the wider financial system". This underscores the significance of operational resilience as a supervisory focus.

We are here to help – Deloitte believes the development and implementation of an operational resilience framework will strengthen your broader business proposition in addition to aligning with HKMA's expectations and supervisory approach, which are based on the relevant work of The Principles for Operational Resilience (POR) issued by the Basel Committee on Banking Supervision (BCBS) and are Deloitte's key areas of expertise.

HKMA expects all Als to be compliant with requirements relating to the development of its operational resilience framework by 31 May 2023, and those relating to the implementation of the framework no later than 31 May 2026. At a minimum, the HKMA expects Als to include the following components within its operational resilience framework:

Operational Resilience Parameters

 Mechanism for determining operational resilience parameters, namely identifying critical operations, setting tolerance for disruption for critical operations, and identifying severe but plausible scenarios.

Risk Management Policies and Frameworks

 Leverage different risk management frameworks, as appropriate, to offer holistic and comprehensive support to the critical operation, and be prepared to manage all risks with the potential to affect critical operations delivery.



Mapping Exercises

Identify and document: (i) the people, processes, technology, information, facilities; and (ii) the interconnections and interdependencies among these factors that are necessary for the AI to deliver its critical operations.

Scenario Testing

 Regular testing of the operational resilience framework to ensure the ability to continue delivering critical operations through disruptions, including under severe but plausible scenarios

Incident Management

 Establish an effective incident management programme to manage all incidents, especially those that may impact critical operations.

Given the importance of operational resilience for an AI to deliver critical operations through disruption and remain viable under extreme scenarios, an AI's Board of Directors (Board) and senior management are expected to actively participate in establishing, implementing and overseeing the operational resilience framework.

Deloitte, a leader and pioneer in Operational Resilience and Crisis Management

As leaders and pioneers in resilience and crisis management, we have a depth and breadth of expertise and are well placed to help Als understand the complexities and nuances involved in building operational resilience.



Extensive Financial Services Experience

Our deep understanding of the challenges and good practices within the FS sector allow us to provide strategic and technical advice to our clients across the full range of operational resilience issues.

Proven expertise

We have long-established relationships with a number of clients in the FS sector and have worked with them to develop their operational resilience capabilities, both in terms of putting in place frameworks and practically executing on them.

Cross Industry Insight

Through our work with a wide range of organizations, we have accumulated an extensive repository of operational resilience frameworks and approaches, including governance, operating models and approaches to identifying and mapping important business services and setting impact tolerance statements.

Deep Thought Leadership

We have issued several point of view papers on operational resilience (<u>International regulatory alignment on operational resilience - making steady progress</u>) offering practical guidance on execution of operational resilience within FS sectors

How can Deloitte help?

We have identified six key steps that need to be undertaken to achieve the right outcomes for operational resilience.

Phase 2: Become Operational Resilience (by 31 May 2026) Step 4: Step 2: Step 3: Step 6: Step 1: Determine **Prepare For and** Step 5: Map **Achieve** Manage Risks to Perform Perform Gap Operational Interconnections & Self-Assessment **Analysis** Resilience **Critical Operations** Scenario Testing Readiness Interdependencies **Parameters** Delivery Perform gap analysis Establish a set of criteria to Based on the operational Support the bank Support the bank to Perform high-level against HKMA SPM OR-1, identify the bank's critical interconnections and resilience roadmap, support assess the OR-2 and TM-G-2 operations bank's enhancement on:plausible scenarios effectiveness of the interdependencies Provide recommendations Identify critical operations bank's operational mappings on identified o Operational risk management testing in refining the Operational and their corresponding operations o Business continuity plan resilience

Contact Us

Resilience governance

model

framework and operating



Adelide Yeung Financial Industry Risk and Regulation Leader

tolerance for disruption

· Identify a list of severe but

plausible scenarios

adeyeung@deloitte.com.hk +852 2238 7778



Wai Ling Ho Associate Director, Risk Advisory

who@deloitte.com.hk +852 2531 1432



Customise an indicative 3-

year operational resilience

implementation roadmap

Eileen Cheng Partner, Risk Advisory Cyber

o Incident management

o Third-party dependency

o ICT, including cyber security

eicheng@deloitte.com.hk +852 2238 7119



Alan Wong Associate Director, Risk Advisory

alancwong@deloitte.com.hk +852 2740 8635



Justin Lau
Director, Assurance Complex Accounting (FSI)

juslau@deloitte.com.hk +852 2852 6317



About Deloitte

Deloitte refers to one or more of Deloitte Touche Tohmatsu Limited ("DTTL"), its global network of member firms, and their related entities (collectively, the "Deloitte organization"). DTTL (also referred to as "Deloitte Global") and each of its member firms and related entities are legally separate and independent entities, which cannot obligate or bind each other in respect of third parties. DTTL and each DTTL member firm and related entity is liable only for its own acts and omissions, and not those of each other. DTTL does not provide service to clients. Please see www.deloitte.com/about to learn more.

Deloitte is a leading global provider of audit and assurance, consulting, financial advisory, risk advisory, tax and related services. Our global network of member firms and related entities in more than 150 countries and territories (collectively, the "Deloitte organization") serves four out of five Fortune Global 500° companies. Learn how Deloitte's approximately 330,000 people make an impact that matters at www.deloitte.com.

Deloitte Asia Pacific Limited is a company limited by guarantee and a member firm of DTTL. Members of Deloitte Asia Pacific Limited and their related entities, each of which are separate and independent legal entities, provide services from more than 100 cities across the region, including Auckland, Bangkok, Beijing, Hanoi, Hong Kong, Jakarta, Kuala Lumpur, Manila, Melbourne, Osaka, Seoul, Shanghai, Singapore, Sydney, Taipei and Tokyo.

The Deloitte brand entered the China market in 1917 with the opening of an office in Shanghai. Today, Deloitte China delivers a comprehensive range of audit & assurance, consulting, financial advisory, risk advisory and tax services to local, multinational and growth enterprise clients in China. Deloitte China has also made—and continues to make—substantial contributions to the development of China's accounting standards, taxation system and professional expertise. Deloitte China is a locally incorporated professional services organization, owned by its partners in China. To learn more about how Deloitte makes an Impact that Matters in China, please connect with our social media platforms at

This communication contains general information only, and none of Deloitte Touche Tohmatsu Limited ("DTTL"), its global network of member firms or their related entities (collectively, the "Deloitte organization") is, by means of this communication, rendering professional advice or services. Before making any decision or taking any action that may affect your finances or your business, you should consult a qualified professional adviser.

No representations, warranties or undertakings (express or implied) are given as to the accuracy or completeness of the information in this communication, and none of DTTL, its member firms, related entities, employees or agents shall be liable or responsible for any loss or damage whatsoever arising directly or indirectly in connection with any person relying on this communication. DTTL and each of its member firms, and their related entities, are legally separate and