MITR/TECH

"It's easy to use and navigate."

Automating spreadsheet control and attestation processes at Rabobank delivered improved regulatory compliance.

Installing both our ESM and IMS solutions, Rabobank has achieved significant improvements in their spreadsheet and EUC controls and visibility of the associated risks.

Rabobank further utilized IMS for attestation process management, capturing managing, auditing and reporting on its unstructured compliance processes.

The Challenge

EUC Controls

Rabobank originally identified that their spreadsheet and End User Computing (EUC) estate on the trading floor was vast and had minimal management controls. They needed to demonstrate controls over their spreadsheets in recognition of the demands of the regulators to eliminate spreadsheet errors. Enterprise Spreadsheet Manager (ESM) was already installed in the business but in different department, leaving it highly under-utilized.

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SEB SOBH

Markets Business Manager, Rabobank

Without an enforceable spreadsheet and EUC policy, ensuring the adoption of ESM was proving a challenge, making spreadsheet discovery problematic.

Global Compliance

Rabobank is exposed to multiple global compliance regimes which impact the business across its various lines of defense – from the trading desk through to risk, compliance and audit. The bank typically used spreadsheets to manage their unstructured compliance processes which were hard to keep track of changes and ensure the process was auditable. The workload required to manage and maintain them, as well as the effort of end users to complete them, was proving too onerous for staff. They also failed to provide the level of management control and auditability that regulators increasingly expect.

The Solution

EUC Management

Rabobank originally began using ESM to apply a control framework, providing visibility of changes

made to the spreadsheets and EUC files. To help meet the challenge of spreadsheets discovery and inventory, Rabobank deployed our Inventory Management System (IMS) in parallel with ESM. This solution provided the bank with the capabilities it needed to create an up-to-date inventory of all the EUC files and spreadsheets. The integration between IMS and ESM made the whole process automated – from registering and bringing identified spreadsheets/EUC under control across its lifecycle, through to retirement and replacement in the enterprise system.

Attestation Management

Once Rabobank had the management of their EUCs under control they began to look at how else they could use IMS. The bank decided to use IMS as a platform to capture, manage, audit and report on its unstructured compliance processes. Leveraging the powerful rules based capabilities of IMS, Rabobank have reviewed, defined and codified the issues that the business is exposed to. "Take the example of the Volcker Rule. We identified the questions we wanted to ask users to ensure compliance with the rule and used the solution to create a template that works more efficiently for the business" – Seb Sobh, Markets Business Manager, Rabobank.





The Benefits

The Rabobank trading floor has complete visibility of its spreadsheets and EUCs, as well as when and how individuals have responded to attestation questionnaires, such as those used for the Volcker Rule.

- Today Rabobank has has complete visibility of its spreadsheet and EUC landscape. Files are automatically given a risk rating, monitored and baseline controls applied. This has created a streamlined and transparent process for the discovery and monitoring of critical EUCs, aligning to a new EUC control framework.
- IMS has helped Rabobank to gather information in a standardized way, attributing ownership of spreadsheets and EUCs to designated

individuals. This increase in ownership of EUC files has led to improved controls throughout the organization, giving the bank a single source of information for auditors and management, aiding both regulatory and audit compliance processes.

- With so many controls managed in one central location, Rabobank is now able to draw conclusions on important areas of the business that simply wasn't possible before. This has given the organization a real-time understanding of what is happening in the various trading departments, being able to respond immediately to their requests for information.
- Rabobank is now able to undertake continuous risk assessment and has good insight into its risk exposures, enabled by an at-a-glance view of all relevant non-compliance issues.

greatly appreciate the value of the IMS tool, it's easy to use and navigate. The solution is light touch from both the user and IT perspectives. Minimal IT support is required to maintain IMS."

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Markets Business Manager, Rabobank



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