Introduction

Centurion TPM is the TPM solution that is strategically aligned with *OCC Bulletin 2013-29* (et al) to deliver a scalable, customizable, powerful, comprehensive, cohesive, and *effective* real time Third Party Risk Management Program that is sure to please regulators. In fact, we guarantee it[1].

How *CENTURION* Works

1. *Centurion* presents a credible detailed strategic plan which can be *quickly implemented*, providing an effective response to regulators.

2. *Centurion* works with any governance structure and will easily adapt to a changed environment.

3. *Centurion* leverages the Bank's current TPM system, capitalizing on the investment already made in existing architecture.

4. *Centurion* exists as an overlay; it will not be part of the Bank's core system, thus it will not use any bandwidth; rather, it will be a Cloud-based SaaS application consisting of a pure golden source repository and database of TPM critical components that have been risk-assessed and risk-rated (i.e., validated).

5. Centurion provides a centralized risk nerve center (i.e., *Centurion Station)* which is the heartbeat of the program, staffed by MCE employees (through its staff augmentation services), saving the Bank significant staffing expense. These employees (called "Centurions") are experienced, highly trained risk specialists who arrive at the Bank fully trained and are productive the first day. Input into the Centurion system will be restricted to authorized MCE Officers and Bank Centurions to ensure the data remains pure and the program remains in regulatory compliance.

6. *Centurion* introduces independent review as BAU throughout the TPM process by implementing Centurion reviews of all risk ratings being generated, which will provide an effective 2nd line of defense sure to please the regulators.

7. *Centurion* provides an automated real-time dashboard which will provide decision makers with real-time validated risk ratings, along with options for actionable steps to mitigate risks, and heat maps to instantly identify high risk areas. Access to view Centurion's dashboard and risk profiles will be available to all critical TPM roles. Searches will be limited to authorized categories: Supplier, Parent, Country, Category, BSRM, SMC, Keyword, etc.

8. *Centurion* Ratings are generated by an algorithm applied to each risk item reviewed: *Raw Risk Rating x Assigned Weight x Comfort Setting = Adjusted Rate*. The Bank chooses its *Comfort Setting* according to its risk appetite: Low Risk (1-2), Moderate Low (2-3), Moderate High 3-4) and High Risk (4-5).

9. *Centurion* ensures regulatory compliance by comparing the *Adjusted Rate* (AR) to the Bank's *Comfort Setting (CS)*. If AR is greater than CS, Centurion's response will be "Remediate." If AR is less than or equal to CS, the response will be "Approved." Items that need remediation will be (1) returned to the BSRM along with remediation tips and a due date and (2) calendared with email alerts.

10. *Centurion* also provides world class training to all layers of the Bank's TPM program to ensure a thorough understanding of all governance, regulations, risk assessment, and mitigation strategies so that all decisioning is based on sound reasoning supported by real-time information.

11. *Centurion* performs the TPM *risk assessment role* required by regulators, providing the Bank's strategic and tactical TPM managers (i.e., Boards, Senior Managers, SMCs, and BSRMs) the information they need to make informed decisions. This partnership creates a well balanced and effective TPM risk management program.

12. *Centurion* provides Board Members and Senior Management with real-time detailed and summary information about the Bank's TPM program and will simplify their required involvement in the process and provide an easy audit trail for regulators.

13. *Centurion* provides regulators with an easy-to-follow traceability map so they can see where and how their regulations are being implemented, a feature the regulators will appreciate.

14. *Centurion* provides a full audit trail, audit transparency, and documented edit history to facilitate audits and examinations.

[1]Guarantee is dependant on Bank's full implementation and compliance with the provisions of *Centurion TPM.*