

## Phase I:

### Audit preparedness for Cyber Security & Cyber Resilience Framework.

## Phase II:

### Policies and procedures -

- Review policy / procedures related to the technology function and environment

### 1. IT General & Cyber Security Controls review -

- **Logical Access –**
  - Review of user management procedures at Application, Operating System and Database Levels
  - Review of privileged access rights granted to application and system administrators
  - Review of account and password policy controls
- **Physical & environmental Access Controls –**
  - Review of the procedures implemented at the Data Center (DC) / server rooms for:
  - Assess the critical assets for Environmental Management system.
- **Change management process & system documentation –**
  - Review the program change management with respect to policy & procedures.
  - Review the procedures for requesting, development, testing and implementing changes.
  - Review the process for monitoring program modifications.
  - Review segregation of duties.
- **System Maintenance –**
  - Review of Annual Maintenance Contracts (AMCs) / Warranties, Service Level Agreements (SLA)
- **Event & application Log maintenance –**
  - Review the policies and procedures adopted for reviewing and following-up activity logs
- **Third party Management–**
  - Review the process for monitoring and reporting on the achievement of third party service level performance criteria.
  - Review Service Level Agreements(SLA)/Non-Disclosure Agreements (NDA) for the maintenance and upkeep of the systems
- **Backup & recovery process–**
  - Review Backup related Policies & Procedures and compliance thereof.
- **Incident Management –**
  - Review Incident Management related Policies & Procedures and compliance thereof.
- **Exchange of Information –**
  - Review the interparty communication controls relating to exchange of information.
- **Business continuity management –**

- Review the Business continuity management related Policies & Procedures and compliance thereof.
  - **Compliance –**
    - Perform compliance review vis-à-vis IT regulatory requirements provided by the AMC.
  - **Interfaces -**
    - Review controls over interfaces of Canara Robeco with –
      - Internal Systems
      - Broker systems (STP/Nifty Files upload)
      - Custodian / fund accounting systems
      - R&T agent
  - **Security Review –**
    - Security and controls review of Operating systems, SQL Database.
    - Policies & Security review of Firewall, Servers & desktops.
    - Website VAPT assessment
2. **In Scope Applications to be covered:**
- AMC: Adrenalin, Employee Trading system, O365, SUN Accounting system & Call Management
  - Mutual Fund: Bloomberg – POMS, BTS Interface, Excel Micros, NDS system & Scheme Accounting
  - Fund Accountant – HSBC: IFS – Fund Accounting system
  - R&T – CAMS/Karvy: CRM, Unit processing process
  - Custodian – HSBC/HDFC: Software for Receipt entry & reconciliation
3. **IT Infrastructure to be covered:**
- Firewall,
  - Servers,
  - Network,
  - Desktops
4. **System software to be covered:**
- Operating Systems (system software)
  - SQL Database (system software).
5. **Website**
- Distributor Portal
  - Catalogue Portal
  - Investor Online Portal
6. **Audit to be conducted as per SEBI Circular (SEBI/HO/IMD/DF2/CIR/P/2019/57) dated 11<sup>th</sup> April 2019:**

**Audit Period (F.Y.): 2019-20, 2020-21 & 2021-22**

**Yearly Audit Schedule:**

<b>Stages</b>	<b>Activity</b>	<b>Time Lines</b>
1	Project kick-off Meeting	4 <sup>th</sup> Week of May
2	Planning	1 <sup>st</sup> week of June
3	IT Policy & Procedures Review	2 <sup>nd</sup> week of June
5	Audit Execution	4 <sup>th</sup> week June till 1 <sup>st</sup> week of July
6	Draft report for discussion	3 <sup>rd</sup> week of July
7	Final Report for Management Review	1 <sup>st</sup> week of August