

Re: SWIFT Attestation

Anthony Scarola <ascarola@applebank.com>

Fri, Dec 17, 2021 at 11:55 AM

To: Hillel Judasin <hjudasin@applebank.com>

Cc: Max Tumarinson <mtumarinson@applebank.com>, Allen Lum <alum@applebank.com>, Hoang Vinh Nguyen <hnguyen@applebank.com>, Debi Gupta <dgupta@applebank.com>, George He <ghe@applebank.com>, Ronni Silver <rsilver@applebank.com>

Excellent! Thank you Hillel. Great work Allen and Vinh. Have a nice weekend all.

On Fri, Dec 17, 2021 at 11:50 AM Hillel Judasin hjudasin@applebank.com wrote:

Max.

This email is intended to wrap up Internal Audit's work on the SWIFT Attestation project.

The annual Attestation for 2021 needs to be performed by someone independent of the processes that support the SWIFT technology and funds transfer function, but need not be an auditor. For Apple Bank, the Information Security Department performs the Attestation because the department does not support the technology or perform the function. As a matter of practicality, the Governance Risk and Control group within IT has both the skillset and independence to perform the test-work under the aegis of the Information Security Department. To assist the testing process and provide an additional layer of independent oversight, Internal Audit performed some tests and reviewed the work performed by the Governance Risk and Control group to assure you that the conclusions are reasonable. At this time, our work is completed.

Hillel

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