

From: Nguyen, Hoangvinh
Sent: Thursday, August 08, 2019 10:18 AM
To: Wong, May; Singh, Riteshkumar; Ramirez, Liliana P
Cc: Sivakumar, K; Lum, Allen B.; Shrivastava, Vishnupriya; Adekanmbi, Joba
Subject: RE: Investments ITD- Approach Status

Hi May:

I am proposing the following approach:

1. For the tests that IT SOX had performed in 2017-18:

The 3-year cycle will be kept. Therefore, benchmarking shall be performed with the following steps:

- a) Obtain evidences that the query/code that implement the SOX control had not changed since the last test date in 2018
- b) Verify and get comfort that changes had not been made so that baseline is not required in 2019. See set procedure A and B for details.

2. For the tests that are either new to IT SOX in 2019 or with changes in 2018:

- a) Perform "Full/False Accept Reject Testing" (as in 2017/2018)
- b) Use Source data extract to re-perform report/query (as in 2017/2018)
- c) Execute set procedure B

Set Procedure A: Verify that the baseline had not changed

- a) Obtain evidences from the application version control that the codes have not changed
- b) If the codes have changed but the changes do not impact the logic of the control
 - a. Obtain the change request that is related to the change
 - b. Obtain the UAT test results of the change
 - c. Review and establish comfort that the changes did not impact the logic and therefore re-baseline is not required
- c) Perform Procedure B if necessary

Set Procedure B: Investigate the code

- a) "Code review" to the extent of explaining SQL, 3-GL syntax will not be performed because this should not be a programming exercise
- b) Investigate the appropriateness of the data sources
 - a. Establish that the "Full/False Accept Reject Testing" was performed in the PROD environment against PROD database
 - b. In the code: Identify all data tables. Provide narratives to explain the contents of the table and why it is relevant to the ITD
 - c. In the code: Identify all data operations such as SUB-QUERY, JOIN, VIEW, TEMPORARY TABLE. Provide narratives to explain the contents of these objects and why they are relevant to the ITD
- c) Investigate the "hard codes"
 - a. In the code: Identify all "hard codes" that were used for filtering the data. Provide narratives to explain the filtering logic and why they are "legitimate"
 - b. In the code: Identify all "hard codes" that were not related to the business logic (e.g. Login, password, etc.). Get IT management to explain and confirm that the related risks have been identified
- d) Investigate the stored procedures, AUTOSYS job, etc.
 - a. In the code: Identify all stored procedures, AUTOSYS jobs, etc.
 - b. In the code: Provide narratives to explain the function of the objects

- c. In the code: If there are operations that retrieve, update or delete data in the PROD database, perform step b) and c)

With the above procedures, as an auditor, I will be comfortable signing off my SOX test.

However, I recognize that these procedures require: a) auditor to “review” the underlying codes and b) IT to help provide the explanation “narratives”

Please let me know whether you want to have a call to discuss.

To Everybody on May’s email:

Please help me out on this. Please shout if anything I proposed above would not work.

Regards



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From: Wong, May

Sent: Thursday, August 08, 2019 9:29 AM

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Subject: RE: Investments ITD- Approach Status

Hi Ritesh - We are meeting with PWC on Tuesday to discuss the approach. See attached for some background.

Hi Vinh/Liliana – your perspectives please – should we continue to proceed with testing anyway on select items as we don’t think this PWC discussion is going to change the existing way we are testing? Additionally, are there ITD items that are not impacted and we can continue anyway? If so, I’ll set up meeting to discuss which items can continue to proceed with bau testing so that we can be on the same page.

From: Singh, Riteshkumar <Riteshkumar.Singh@aig.com>

Sent: Thursday, August 8, 2019 8:31 AM

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Subject: Investments ITD- Approach Status

Hello May,

Good Morning.

I hope you are doing good.

I am reaching out to know if we have any update from PWC on the approach of ITD testing.

Per Allen and to avoid duplicate work, we have stopped all the testing unless we are in agreement with PWC on the approach.

I will appreciate if you can provide any update you have.

Thanks & Regards,

Ritesh Kumar Singh

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