

Risk Area	Metrics	Defect Measure	Review Period	India	Description
Key Process Risks	Open gaps on key controls in AP process	•Total number of open gaps for each account	Feb'21	1	AP - 1 Gap open SDL/FLM high dollar value review is not being done for auto payment invoices
		•Number of open gaps >60 days:-			
		•Open gaps >60 days with Client dependency			
		•Open gaps >60 days with Genpact ownership			
	Cardholder data exposure	•Exposure of 16 digit credit card no, expiry date, CVV combination where there are insufficient compliance controls	Feb'21		CC data is available for 2 of the processes with in MHE - Charge back process in AR and T&E process in AP, risk assessment has been completed and client ecknowledged the risk Need to check if we require legal language for the risk involved while WFH
	Open internet access to non-business sites	•Account with open gaps	Feb'21		The client has acknowledged the risk and willing to accept the risk in its current form.
Data Privacy	GDPR assessments open > 30days	•Number of assessments open >30 days	As on 7th Mar'21		H1 2021 DP assessments were triggered to team
		•Number of gaps open >30 days			H1 2021 DP assessments were triggered to team
	GDPR gaps open > 30 days				
Key Contractual Obligations	Non Compliance with regard to iCon Self-Assessment taken by 1st	•Number of self-assessment commitments not taken yet	As on 7th Mar'21		No defects reported.
		•Number of fields which are non compliant on either one of the obligations			No defects reported.
	Client BGC requirement not adhered to	•Number of defects for each account where the BGC was not performed as per contractual requirements for new joiners	Feb'21		No observations noted
	Client logical access requirement not adhered to	•Joining/PID movement Compliance	Feb'21		No observations noted
	Delay in revocation of Client Logical access	•Number of instances where notifications were not sent to Client within 24 hrs. of relieving date or contractually agreed timelines, whichever is earlier	Feb'21	1	delay in logical access revocation more than 6 - 15 days
	Delay in revocation of Physical access to work area	•Number of cases of delay in deactivation of physical access to the work area within 24 hrs.. of relieving/movement	Feb'21		
	BCM non adherence	•Latest versions of BIA and BC Plans for mission critical processes not available (PID)	Q1'21		Currently in WFH BCP - Not applicable
		•BCP Hot/Cold tests not performed as per defined schedule			Currently in WFH BCP - Not applicable

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Key Contractual Obligations	Non compliances w.r.t Subcontractor aligned to the account	•Number of subcontractors engaged in the account without Client approval as required	Feb'21		NA
		•Number of subcontractors without Client defined BGC & other mandates	Feb'21		
Digital	RPA Risks identified	•Number of issues identified in any audit/assessments conducted	Feb'21		NA

Incidents & Audit findings	Incidents of high severity	•Number of high-severity incidents	Feb'21	0	No incidents noted
	External/Client audit observations	•Number of significant findings for the account that underwent the audit	Feb'21		NA
Information Security	Access Reviews	Monthly/ Quarterly Reconciliation not performed for physical access	Feb'21		
		Monthly/ Quarterly Reconciliation not performed for logical access	Feb'21		Q1 '21 report is due for reporting and it is being followed up with the team
		Monthly/ Quarterly Reconciliation not performed for G applications	Feb'21		NA
Additional Process Compliance areas	SOP Process management	Non adherence to SOP Review process as agreed in MSA (If MSA is silent, GENPACT SOP management process to be followed)	Feb'21		SOP's are approved as per Ops update
	Client/Process controls	Non Adherence to Internal Control Framework	Feb'21		No issues reported.

Compliance awareness sessions	Phishing awareness training assigned for all employees		as on 7th Apr 2021		Phishing awareness special drive completed
	Sessions		On-going		On-going zoom session were conducted along with SDL