

ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
0		<b>0</b>	<b>3.1.1 Consolidated EPS IHC ERM Area Program SHUSA_2015_0212 v3updates</b>	<b>855d?</b>	<b>9/23/13</b>	<b>12/30/16</b>	<b>60%</b>		
1		<b>1</b>	<b>EPS IHC ERM Area Program</b>	<b>855d?</b>	<b>9/23/13</b>	<b>12/30/16</b>	<b>60%</b>	<b>Edward Smith</b>	
2		<b>1.1</b>	<b>Organization</b>	<b>435d</b>	<b>8/1/14</b>	<b>3/31/16</b>	<b>64%</b>	<b>Ignacio Fuentes</b>	
3	<b>3.1.1</b>	<b>1.1.1</b>	<b>SHUSA</b>	<b>369d</b>	<b>8/1/14</b>	<b>12/31/15</b>	<b>97%</b>	<b>Edward Smith</b>	
4	<b>3.1.1</b>	<b>1.1.1.1</b>	<b>Structure</b>	<b>76d</b>	<b>8/1/14</b>	<b>11/14/14</b>	<b>100%</b>	<b>Diego Begara</b>	
5	3.1.1	1.1.1.1.1	Revise organization structure to develop the US ERM Area	21d	8/1/14	8/29/14	100%	Diego Begara	Diego Begara
6	3.1.1	1.1.1.1.2	Confirm organization structure for US ERM with CRO and HR	6d	8/29/14	9/5/14	100%	Diego Begara	Diego Begara
7	3.1.1	1.1.1.1.3	Provide Job Descriptions for US ERM Area new positions	1d	9/5/14	9/5/14	100%	Diego Begara	Diego Begara
8	3.1.1	1.1.1.1.4	Evaluation of new Job Descriptions by Human Resources	18d	9/5/14	9/30/14	100%	Carmen Briongos	Carmen Briongos
9	3.1.1	1.1.1.1.5	Existing team members assigned to new structure	18d	9/5/14	9/30/14	100%	Carmen Briongos	Carmen Briongos
10	3.1.1	1.1.1.1.6	Prepare Talking Points	12d	9/30/14	10/15/14	100%	Carmen Briongos	Carmen Briongos
11	3.1.1	1.1.1.1.7	Communication to US ERM team	6d	10/15/14	10/22/14	100%	Carmen Briongos	Carmen Briongos
12	3.1.1	1.1.1.1.8	Raise questions for new positions and review existing open reqs.	13d	10/22/14	11/7/14	100%	Carmen Briongos	Carmen Briongos
13	3.1.1	1.1.1.1.9	Process Change for existing team members	6d	11/7/14	11/14/14	100%	Carmen Briongos	Carmen Briongos
14	<b>3.1.1</b>	<b>1.1.1.2</b>	<b>Hiring:</b>	<b>66d</b>	<b>10/1/14</b>	<b>12/31/14</b>	<b>100%</b>	<b>Diego Begara</b>	
15	3.1.1	1.1.1.2.1	75% of Team in place	66d	10/1/14	12/31/14	100%	Diego Begara	Diego Begara
16	<b>3.1.1</b>	<b>1.1.1.3</b>	<b>Organization US Business Units</b>	<b>80d</b>	<b>11/3/14</b>	<b>2/23/15</b>	<b>99%</b>	<b>Edward Smith</b>	
17	3.1.1	1.1.1.3.1	Maintain the organizational structure approved for all the US Risk Business Units in coordination with the ERM Areas in the Business Units and Human Resources	30d	11/3/14	12/12/14	100%	Ignacio Fuentes	Ignacio Fuentes
18	3.1.1	1.1.1.3.2	Communicate reporting lines to all relevant stakeholders - send documents to CRO. All IHC risk managers should report to SHUSA head of RMAs. (Roman communication - 12/29/14)	56d	11/28/14	2/13/15	100%	Ignacio Fuentes	Mark Pfeifer
19	3.1.1	1.1.1.3.3	Communicate SHUSA 2015 ERM Framework to all CUSO entities (PR, Miami, NY, ANTSUS, BSTI, SAM)	10d	2/2/15	2/13/15	100%	Ignacio Fuentes	
20	<b>3.1.1</b>	<b>1.1.1.3.4</b>	<b>Elaborate procedure to issue periodic report on Headcount and organizational charts</b>	<b>61d</b>	<b>11/28/14</b>	<b>2/20/15</b>	<b>97%</b>	<b>Ignacio Fuentes</b>	
21	3.1.1	1.1.1.3.4	Draft	43d	11/28/14	1/27/15	100%	Ignacio Fuentes	
22	3.1.1	1.1.1.3.4	Final Version	18d	1/28/15	2/20/15	90%	Ignacio Fuentes	
23	<i>3.1.1</i>	<i>1.1.1.3.5</i>	<i>Milestone: SHUSA ERM Organizational Structure Established</i>	<i>0d</i>	<i>2/23/15</i>	<i>2/23/15</i>	<i>0%</i>	<i>Ignacio Fuentes</i>	<i>Diego Begara</i>

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24	<b>3.1.1</b>	<b>1.1.1.4</b>	<b>Training - BAU</b>	<b>326d</b>	<b>10/1/14</b>	<b>12/31/15</b>	<b>93%</b>	<b>Edward Smith</b>	
25	3.1.1	1.1.1.4.1	Revise current Risk Consolidation Training Plan and adapt it to the new US ERM Area	58d	10/1/14	12/19/14	100%	Ignacio Fuentes	Mark Pfeifer
26	3.1.1	1.1.1.4.2	Identify covered population	58d	10/1/14	12/19/14	100%	Ignacio Fuentes	Mark Pfeifer
27	3.1.1	1.1.1.4.3	Execute Training Plan	33d	11/17/14	12/31/14	100%	Ignacio Fuentes	Mark Pfeifer
28	3.1.1	1.1.1.4.4	Attest that training has been completed across the covered population	33d	11/17/14	12/31/14	100%	Ignacio Fuentes	Mark Pfeifer
29	<i>3.1.1</i>	<i>1.1.1.4.5</i>	<i>Milestone: Training Plan Implemented for 2014</i>	<i>0d</i>	<i>12/31/14</i>	<i>12/31/14</i>	<i>100%</i>	<i>Ignacio Fuentes</i>	<i>Mark Pfeifer</i>
30	3.1.1	1.1.1.4.6	Prepare Training plan for 2015 - need a resource to complete this task.	25d	3/2/15	4/3/15	40%	Elizabeth Marshall	
31	<i>3.1.1</i>	<i>1.1.1.4.7</i>	<i>Milestone: Training Plan Implemented for 2015</i>	<i>0d</i>	<i>12/31/15</i>	<i>12/31/15</i>	<i>99%</i>	<i>Ignacio Fuentes</i>	
32	<b>3.1.5</b>	<b>1.1.2</b>	<b>Puerto Rico (BSBC, BSPR, SIA, SS, SFS, SOB)</b>	<b>326d</b>	<b>1/1/15</b>	<b>3/31/16</b>	<b>20%</b>	<b>Juan Pablo Jurado</b>	
33	<b>3.1.5</b>	<b>1.1.2.1</b>	<b>Ensure that the definition of the CRO and Risk areas' roles and responsibilities are in accordance with US organization</b>	<b>22d</b>	<b>4/1/15</b>	<b>4/30/15</b>	<b>0%</b>	<b>Juan Pablo Jurado</b>	
34	3.1.5	1.1.2.1.1	ERM	22d	5/1/15	6/1/15	0%	Juan Pablo Jurado	
35	3.1.5	1.1.2.1.2	Market Risk	22d	5/1/15	6/1/15	0%	Juan Pablo Jurado	
36	3.1.5	1.1.2.1.3	Credit Admissions and Monitoring	22d	5/1/15	6/1/15	0%	Juan Pablo Jurado	
37	3.1.5	1.1.2.1.4	Portfolio Management	22d	5/1/15	6/1/15	0%	Juan Pablo Jurado	
38	3.1.5	1.1.2.1.5	Model Risk Management	22d	7/1/15	7/30/15	0%	Juan Pablo Jurado	
39	3.1.5	1.1.2.1.6	Operational Risk	22d	7/1/15	7/30/15	0%	Juan Pablo Jurado	
40	3.1.5	1.1.2.1.7	Collection, Workout & Real Estate Owned	22d	5/1/15	6/1/15	0%	Juan Pablo Jurado	
41	<i>3.1.5</i>	<i>1.1.2.1.8</i>	<i>Milestone: Roles and Responsibilities Implemented</i>	<i>0d</i>	<i>7/30/15</i>	<i>7/30/15</i>	<i>0%</i>	<i>Juan Pablo Jurado</i>	
42	<b>3.1.5</b>	<b>1.1.2.2</b>	<b>Review and implement the roles and responsibilities of the CRO function identified in the IHC ERM Framework</b>	<b>85d</b>	<b>2/2/15</b>	<b>5/29/15</b>	<b>46%</b>	<b>Juan Pablo Jurado</b>	
43	3.1.5	1.1.2.2.1	IHC Project Staffing Assessment against Risk Framework & Governance Structure	13d	2/2/15	2/18/15	100%	Juan Pablo Jurado	
44	3.1.5	1.1.2.2.2	Develop Job Descriptions for IHC Project	21d	2/18/15	3/18/15	100%	Juan Pablo Jurado	
45	3.1.5	1.1.2.2.3	Fill Any Open Roles for IHC Project	45d	3/30/15	5/29/15	5%	Juan Pablo Jurado	

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46	3.1.5	1.1.2.2.4	Milestone: Resources Implemented	0d	5/29/15	5/29/15	0%	Juan Pablo Jurado	
47	3.1.5	1.1.2.3	Talent Management and Compensation Processes	44d	7/1/15	8/31/15	0%	Juan Pablo Jurado	
48	3.1.5	1.1.2.3.1	Updating the CRO compensation determination process per the EPS requirements	44d	7/1/15	8/31/15	0%	Juan Pablo Jurado	
49	3.1.5	1.1.2.4	Risk Management Perfomance Objectives	326d	1/1/15	3/31/16	40%	Juan Pablo Jurado	
50	3.1.5	1.1.2.4.1	Set up ERM-related objectives within the 2015 Human Resources performance evaluations	44d	1/1/15	3/3/15	100%	Juan Pablo Jurado	
51	3.1.5	1.1.2.4.2	Align PR ERM Performance objectives with SHUSA IHC	65d	1/1/16	3/31/16	0%	Juan Pablo Jurado	
52	3.1.5	1.1.2.5	Management Training	21d	11/2/15	11/30/15	0%	Juan Pablo Jurado	
53	3.1.5	1.1.2.5.1	Ensure Credit, Market, ERM & Model Risk areas have a training calendar including IHC requirements 2016	21d	11/2/15	11/30/15	0%	Juan Pablo Jurado	
54	3.1.3	1.1.3	Miami	95d	2/2/15	6/12/15	76%	Paul Prado	
55	3.1.3	1.1.3.1	Implement Risk Mgt Organizational Structure	95d	2/2/15	6/12/15	76%	Paulo Prado	
56	3.1.3	1.1.3.1.1	Definition of First and Second Line of Defense	10d	2/16/15	2/27/15	100%	Paulo Prado	
57	3.1.3	1.1.3.1.1	Identify first and second line of defense at BSI	10d	2/16/15	2/27/15	100%	Paulo Prado	
58	3.1.3	1.1.3.1.1	Define structure for ERM align with SHUSA taking into consideration size, complexity and line of business	10d	2/16/15	2/27/15	100%	Paulo Prado	
59	3.1.3	1.1.3.1.2	Identify temporary and BAU resources required to support (Determine if resources are needed or if current resources can perform the work):	19.5d	2/2/15	2/27/15	100%	Paulo Prado	L. Madariaga
60	3.1.3	1.1.3.1.2	Risk ID and Assessment	10d	2/2/15	2/27/15	100%	Paulo Prado	L. Madariaga
61	3.1.3	1.1.3.1.2	Risk Tolerance	10d	2/2/15	2/27/15	100%	Paulo Prado	L. Madariaga
62	3.1.3	1.1.3.1.2	Risk Reporting	10d	2/2/15	2/27/15	100%	Paulo Prado	L. Madariaga
63	3.1.3	1.1.3.1.2	Risk Governance	10d	2/2/15	2/27/15	100%	Paulo Prado	L. Madariaga
64	3.1.3	1.1.3.1.2	Risk Data Aggregation	10d	2/2/15	2/27/15	100%	Paulo Prado	L. Madariaga
65	3.1.3	1.1.3.1.3	Implement required resources for BAU	95d	2/2/15	6/12/15	45%	Paul Prado	
66	3.1.3	1.1.3.1.3	Write job descriptions and provide them to HR for review and approval	15d	2/2/15	2/20/15	100%	Paul Prado	
67	3.1.3	1.1.3.1.3	Obtain budget for local resources	10d	2/9/15	2/20/15	100%	Paul Prado	
68	3.1.3	1.1.3.1.3	Hire resources	30d	5/4/15	6/12/15	0%	Paul Prado	
69	3.1.3	1.1.3.1.3	Milestone: ERM resources implemented in Miami	0d	6/12/15	6/12/15	0%	Paul Prado	

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70	3.1.4	1.1.4	New York	87d	1/12/15	5/13/15	49%	Jim Bathon	
71	3.1.4	1.1.4.1	1.2.1 Determine headcount required in NY if any (e.g. Risk Reporting, Risk ID)	47d	2/16/15	4/21/15	65%	Jim Bathon	
72	3.1.4	1.1.4.1.1	1.2.1.1 Source Risk Management person to implement the project - 1 headcount (consultant or FTE internal hire) - Project Mgr	25d	2/16/15	3/20/15	100%	Jim Bathon	
73	3.1.4	1.1.4.1.1	1.2.1.1.1 Define what they need to do	15d	2/16/15	3/6/15	100%	Jim Bathon	
74	3.1.4	1.1.4.1.1	1.2.1.1.2 Go through weekly budget approval process	10d	3/9/15	3/20/15	100%	Jim Bathon	
75	3.1.4	1.1.4.1.2	1.2.1.2 Source Risk Management person to implement the project - 1+ headcount (FTE internal hire) - ERM Governance, ERM Reporting, and ERM Risk ID functions	22d	3/23/15	4/21/15	25%	Jim Bathon	
76	3.1.4	1.1.4.2	1.2.2 Update organizational structure of NY Business Units (to align with SHUSA)	87d	1/12/15	5/13/15	33%	Jim Bathon	
77	3.1.4	1.1.4.2.1	1.2.2.1 As Is (Org chart of SIS and NY Branch)	15d	1/12/15	1/30/15	100%	Jim Bathon	
78	3.1.4	1.1.4.2.2	1.2.2.2 BAU Future State	30d	4/1/15	5/13/15	0%	Jim Bathon	
79	3.1.4	1.1.4.2.2	Determine what ERM functions are needed in New York to support NY Branch and SIS	20d	4/1/15	4/28/15	0%	Jim Bathon	
80	3.1.4	1.1.4.2.2	Determine what headcount is required to support NY based ERM functions	10d	4/29/15	5/12/15	0%	Jim Bathon	
81	3.1.4	1.1.4.2.2	Milestone: ERM resources implemented in New York (SIS and NY Br)	0d	5/13/15	5/13/15	0%	Jim Bathon	
82		1.2	Governance	560d?	1/7/14	2/29/16	80%	Ignacio Fuentes	
83	3.1.1	1.2.1	SHUSA	385d	1/7/14	6/30/15	99%	Edward Smith	
84	3.1.1	1.2.1.1	Risk Management Committees	242d	1/7/14	12/10/14	100%	Edward Smith	
85	3.1.1	1.2.1.1.1	Coordinate with the US RMAs Areas the completion of the development of the charters for the new US/SHUSA Risk Management Committee Structure	191d	1/7/14	9/30/14	100%	Ignacio Fuentes	Mark Pfeifer
86	3.1.1	1.2.1.1.2	Enhance Enterprise Risk Management Committee (Charters)	23d	10/1/14	10/31/14	100%	Ignacio Fuentes	Mark Pfeifer
87	3.1.1	1.2.1.1.3	Validate that the SHUSA ERM and EMC charters include a section on independence of the various Risk Management functions as well as independence criteria in regards to the risk management voting members of the committee	23d	10/20/14	11/19/14	100%	Ignacio Fuentes	Mark Pfeifer
88	3.1.1	1.2.1.1.4	Coordinate with the Legal Area the review of the changes to the charters	11d	10/31/14	11/14/14	100%	Ignacio Fuentes	Mark Pfeifer
89	3.1.1	1.2.1.1.5	Ensure proper final approval of the charter changes	18d	11/17/14	12/10/14	100%	Ignacio Fuentes	Mark Pfeifer
90	3.1.1	1.2.1.1.6	Milestone: Approval of Risk Management Committess	0d	12/10/14	12/10/14	100%	Ignacio Fuentes	Mark Pfeifer
91	3.1.1	1.2.1.2	Ensure with the US CRO and the US RMA's the enhancement of the Enterprise Risk Management Committee (Charters)	257d	1/7/14	12/31/14	100%	Ignacio Fuentes	
92	3.1.1	1.2.1.2.1	Operational Risk Committee (Charters)	214d	1/7/14	10/31/14	100%	Ignacio Fuentes	Mark Pfeifer

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93	3.1.1	1.2.1.2.2	Market Risk Committee (Charters)	214d	1/7/14	10/31/14	100%	Ignacio Fuentes	Mark Pfeifer
94	3.1.1	1.2.1.2.3	Credit Risk Committee (Charters)	214d	1/7/14	10/31/14	100%		
95	3.1.1	1.2.1.2.4	Compliance Activities Committee (Charters)	214d	1/7/14	10/31/14	100%	Ignacio Fuentes	Mark Pfeifer
96	3.1.1	1.2.1.2.5	Business Activities Committee (Charters)	214d	1/7/14	10/31/14	100%		
97	3.1.1	1.2.1.2.6	Model Risk Committee	214d	1/7/14	10/31/14	100%	Ignacio Fuentes	Mark Pfeifer
98	3.1.1	1.2.1.2.7	Other Risk Committee and sub-committees	214d	1/7/14	10/31/14	100%	Ignacio Fuentes	Mark Pfeifer
99	3.1.1	1.2.1.2.8	Coordinate with the Legal Area the review of the changes to the charters	34d	9/30/14	11/14/14	100%	Ignacio Fuentes	Mark Pfeifer
100	3.1.1	1.2.1.2.9	Ensure proper final approval of the charter changes	30d	10/30/14	12/10/14	100%	Ignacio Fuentes	Mark Pfeifer
101	3.1.1	1.2.1.2.1	Implement new committees	45d	10/30/14	12/31/14	100%	Ignacio Fuentes	Mark Pfeifer
102	3.1.1	1.2.1.2.1	Milestone: Implementation of the new committees	0d	12/31/14	12/31/14	100%	Ignacio Fuentes	Mark Pfeifer
103	3.1.1	1.2.1.3	US Chief Risk Officer	172d	10/31/14	6/30/15	99%	ignacio Fuentes	
104	3.1.1	1.2.1.3.1	US CRO Roles and Responsibilities	51d	10/31/14	1/9/15	100%	ignacio Fuentes	
105	3.1.1	1.2.1.3.1	Formally document the CRO's expanded risk management role to include all subsidiaries that are deemed part of the IHC.	29d	10/31/14	12/10/14	100%	ignacio Fuentes	Diego Begara
106	3.1.1	1.2.1.3.1	Clarify reporting line between US CRO and BU CRO's including alignment in objectives	29d	10/31/14	12/10/14	100%	ignacio Fuentes	Diego Begara
107	3.1.1	1.2.1.3.1	Enhance US CRO job description to articulate the roles and responsibilities of the position and fully align with EPS requirements for all US Operations	29d	10/31/14	12/10/14	100%	ignacio Fuentes	Diego Begara
108	3.1.1	1.2.1.3.1	The US CRO responsibilities needs to include the mandate to report and of risk reporting and risk management deficiencies of the combined US operations, and resolve such risk management deficiencies in a timely manner	29d	10/31/14	12/10/14	100%	ignacio Fuentes	Diego Begara
109	3.1.1	1.2.1.3.1	The U.S. CRO job description does not fully align with EPS requirements of oversight of the measurement, aggregation, and monitoring and control of the risks undertaken by the combined US operations	29d	10/31/14	12/10/14	100%	ignacio Fuentes	Diego Begara
110	3.1.1	1.2.1.3.1	Review the job description of the CRO to include: Review of liq risk policies & procedures, Review and report on the liquidity Risk Tolerance, Review and approve new products & buss lines, review cash flow projections, establish liq risk limits & monitor	29d	10/31/14	12/10/14	100%	ignacio Fuentes	Diego Begara
111	3.1.1	1.2.1.3.1	Update / modify the SAN-US Enterprise Risk Management Framework and SHUSA risk management processes to properly reflect the U.S. CRO's roles and responsibilities for the IHC and all of its U.S. subsidiaries.	29d	10/31/14	12/10/14	100%	ignacio Fuentes	Diego Begara
112	3.1.1	1.2.1.3.1	Update the Business Activities Charter to require all new products / business be reviewed by the U.S. CRO prior to committee review.	29d	10/31/14	12/10/14	100%	ignacio Fuentes	Diego Begara
113	3.1.1	1.2.1.3.1	The US CRO owns the Enterprise Risk Management Frmework and is held accountable for developing and monitoring its implementation	29d	10/31/14	12/10/14	100%	ignacio Fuentes	Diego Begara
114	3.1.1	1.2.1.3.1	Milestone: Signoff/Approval of US CRO Roles and Responsibilities	0d	1/9/15	1/9/15	100%	ignacio Fuentes	Diego Begara

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115	3.1.1	1.2.1.3.1	Formalize the process for meeting with the FRB and other key stakeholders, to ensure expectations are properly articulated and documented - Diego to validate with John Corston if this is required.	51d	10/31/14	1/9/15	100%	ignacio Fuentes	Diego Begara
116	<b>3.1.1</b>	<b>1.2.1.3.2</b>	<b>US CRO Compensation</b>	<b>172d</b>	<b>10/31/14</b>	<b>6/30/15</b>	<b>99%</b>	<b>ignacio Fuentes</b>	<b>Diego Begara</b>
117	3.1.1	1.2.1.3.2	Evaluate the U.S. CRO's compensation scheme and determine if it aligns with Regulatory incentive compensation expectations and good governance principles - presenting to the BEREC on 01/28/15	82d	11/24/14	3/17/15	100%	ignacio Fuentes	Maitland,Kerrie
118	3.1.1	1.2.1.3.2	Strengthen the CRO compensation process to ensure that compensation practices and other incentives are consistent with the performance of an objective assessment of risk taken by the combined U.S. operations	98d	10/31/14	3/17/15	100%	ignacio Fuentes	Diego Begara
119	3.1.1	1.2.1.3.2	Provide feedback to HR regarding development for the Risk Score Card and assessment against Risk objectives	64d	10/31/14	1/28/15	100%	ignacio Fuentes	
120	<i>3.1.1</i>	<i>1.2.1.3.2</i>	<i>Milestone: Signoff/Approval of US CRO Compensation</i>	<i>0d</i>	<i>6/30/15</i>	<i>6/30/15</i>	<i>0%</i>	<i>ignacio Fuentes</i>	<i>Diego Begara</i>
121	<b>3.1.5</b>	<b>1.2.2</b>	<b>Puerto Rico (BSBC, BSPR, SIA, SS, SFS, SOB)</b>	<b>237d</b>	<b>1/1/15</b>	<b>11/27/15</b>	<b>39%</b>	<b>Juan Pablo Jurado</b>	
122	<b>3.1.5</b>	<b>1.2.2.1</b>	<b>Control activities, sub-processes and risks (SOX)</b>	<b>64d</b>	<b>1/1/15</b>	<b>3/31/15</b>	<b>100%</b>	<b>Juan Pablo Jurado</b>	
123	3.1.5	1.2.2.1.1	Document within the Internal Control Tool the control activities, sub-processes and risks associated with the ERM area (2015)	64d	1/1/15	3/31/15	100%	Juan Pablo Jurado	
124	<b>3.1.5</b>	<b>1.2.2.2</b>	<b>Issue Monitoring and Escalation Process Implementation</b>	<b>10d</b>	<b>7/27/15</b>	<b>8/7/15</b>	<b>0%</b>	<b>Juan Pablo Jurado</b>	
125	3.1.5	1.2.2.2.1	Review Puerto Rico's Issue Monitoring and Escalation Process with SHUSA IHC Governance to ensure proper lines of communication of relevant issues between PR and SHUSA IHC	10d	7/27/15	8/7/15	0%	Juan Pablo Jurado	
126	<b>3.1.5</b>	<b>1.2.2.3</b>	<b>Governance</b>	<b>130d</b>	<b>6/1/15</b>	<b>11/27/15</b>	<b>5%</b>	<b>Juan Pablo Jurado</b>	
127	<b>3.1.5</b>	<b>1.2.2.3.1</b>	<b>Committee Structure - Santander Puerto Rico</b>	<b>22d</b>	<b>6/1/15</b>	<b>6/30/15</b>	<b>5%</b>	<b>Juan Pablo Jurado</b>	
128	3.1.5	1.2.2.3.1	Enhance BEREC Charter to ensure compliance with EPS requirements	22d	6/1/15	6/30/15	5%	Juan Pablo Jurado	
129	<b>3.1.5</b>	<b>1.2.2.3.2</b>	<b>Risk Oversight Committee</b>	<b>130d</b>	<b>6/1/15</b>	<b>11/27/15</b>	<b>5%</b>	<b>Juan Pablo Jurado</b>	
130	3.1.5	1.2.2.3.2	Perform Process GAP analysis against SHUSA ERM charter	22d	6/1/15	6/30/15	20%	Juan Pablo Jurado	
131	3.1.5	1.2.2.3.2	Review the governance structure based on the IHC Framework to determine if additional updates are required - Santander Bancorp	20d	11/2/15	11/27/15	0%	Juan Pablo Jurado	
132	3.1.5	1.2.2.3.2	Review the governance structure based on the IHC Framework to determine if additional updates are required - Santander Financial Services	20d	11/2/15	11/27/15	0%	Juan Pablo Jurado	
133	3.1.5	1.2.2.3.2	Review the governance structure based on the IHC Framework to determine if additional updates are required - Santander Overseas	20d	11/2/15	11/27/15	0%	Juan Pablo Jurado	
134	<i>3.1.5</i>	<i>1.2.2.3.3</i>	<i>Milestone: PR Risk Management Committess Implemented</i>	<i>0d</i>	<i>11/27/15</i>	<i>11/27/15</i>	<i>0%</i>		
135	<b>3.1.3</b>	<b>1.2.3</b>	<b>Miami</b>	<b>300d?</b>	<b>1/6/15</b>	<b>2/29/16</b>	<b>42%</b>	<b>Lourdes Madariaga</b>	



ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
136	<b>3.1.3</b>	<b>1.2.3.1</b>	<b>Risk Management Committees</b>	<b>174d</b>	<b>1/6/15</b>	<b>9/4/15</b>	<b>59%</b>	<b>Paulo Prado</b>	
137	<b>3.1.3</b>	<b>1.2.3.1.1</b>	<b>Risk Committee Structure</b>	<b>174d</b>	<b>1/6/15</b>	<b>9/4/15</b>	<b>51%</b>	<b>Paulo Prado</b>	
138	3.1.3	1.2.3.1.1	BSI to review risk committees and determine what new committes are required.	29d	1/6/15	2/13/15	100%	Paulo Prado	G. Urbina
139	3.1.3	1.2.3.1.1	For the new risk committees selected ensure risk committee structure is aligned with SHUSA IHC Committees	29d	1/6/15	2/13/15	100%	Paulo Prado	G. Urbina
140	<b>3.1.3</b>	<b>1.2.3.1.1</b>	<b>Create / Update Risk Committee structure for Miami</b>	<b>30d</b>	<b>2/2/15</b>	<b>3/13/15</b>	<b>100%</b>	<b>Paulo Prado</b>	
141	<b>3.1.3</b>	<b>1.2.3.1.1</b>	<b>Re-align BSI committees to SHUSA committees</b>	<b>30d</b>	<b>2/2/15</b>	<b>3/13/15</b>	<b>100%</b>	<b>Paulo Prado</b>	<b>G. Urbina</b>
142	3.1.3	1.2.3.1.1	Draft Structure for Miami	20d	2/2/15	2/27/15	100%	Paulo Prado	
143	3.1.3	1.2.3.1.1	Discuss Structure with SHUSA	10d	3/2/15	3/13/15	100%	Paulo Prado	
144	3.1.3	1.2.3.1.1	Present new BSI Committee structure to the BSI Board for Approval (Board mtg on 04/15/15)	15d	7/6/15	7/24/15	0%	Paulo Prado	
145	3.1.3	1.2.3.1.1	Provide BSI Committee structure to SHUSA legal for review	10d	7/27/15	8/7/15	0%	Paulo Prado	
146	3.1.3	1.2.3.1.1	Provide BSI Risk Committee recommendation to Santander S.A. for approval	30d	7/27/15	9/4/15	0%	Paulo Prado	
147	3.1.3	1.2.3.1.1	ERM to coordinate determination of whether membership or participants change to include SHUSA Risk Area leads as needed for new committees	15d	6/15/15	7/3/15	0%	Paulo Prado	G. Urbina
148	3.1.3	1.2.3.1.1	ERM to coordinate, for existing SHUSA committees, determination of membership or partipants from Miami are needed.	15d	6/15/15	7/3/15	0%	Paulo Prado	G. Urbina
149	<b>3.1.3</b>	<b>1.2.3.1.2</b>	<b>Risk Committee Charters</b>	<b>110d</b>	<b>2/2/15</b>	<b>7/3/15</b>	<b>78%</b>	<b>Paulo Prado</b>	<b>G. Urbina</b>
150	<b>3.1.3</b>	<b>1.2.3.1.2</b>	<b>SHUSA to provide charters to ERM for coordination of provision to all risk areas</b>	<b>29d</b>	<b>2/2/15</b>	<b>3/12/15</b>	<b>100%</b>		
151	3.1.3	1.2.3.1.2	Received SHUSA charter for BERC	29d	2/2/15	3/12/15	100%	Paulo Prado	I. Fuentes
152	3.1.3	1.2.3.1.2	Received SHUSA charter for ERM C	29d	2/2/15	3/12/15	100%	Paulo Prado	I. Fuentes
153	3.1.3	1.2.3.1.2	Received SHUSA charter for Operational Risk	29d	2/2/15	3/12/15	100%	Paulo Prado	I. Fuentes
154	3.1.3	1.2.3.1.2	Received SHUSA charter for Market Risk	29d	2/2/15	3/12/15	100%	Paulo Prado	I. Fuentes
155	3.1.3	1.2.3.1.2	Received SHUSA charter for Model Risk	29d	2/2/15	3/12/15	100%	Paulo Prado	I. Fuentes
156	3.1.3	1.2.3.1.2	Received SHUSA charter for Compliance	29d	2/2/15	3/12/15	100%	Paulo Prado	I. Fuentes
157	3.1.3	1.2.3.1.2	Received SHUSA charter for Credit	29d	2/2/15	3/12/15	100%	Paulo Prado	I. Fuentes
158	<b>3.1.3</b>	<b>1.2.3.1.2</b>	<b>Ensure that the new risk committee charters are aligned with the corresponding SHUSA committee charters (Note - each risk area should determine whether or not they need a Miami risk committee. ERM's role is that of coordination.)</b>	<b>110d</b>	<b>2/2/15</b>	<b>7/3/15</b>	<b>17%</b>	<b>Paulo Prado</b>	<b>G. Urbina</b>
159	3.1.3	1.2.3.1.2	Re-align BSI Committee charters with SHUSA Committee Charters	50d	2/2/15	4/10/15	25%	Paulo Prado	G. Urbina

ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
160	3.1.3	1.2.3.1.2	Provide BSI Charters to SHUSA Legal for review	15d	6/1/15	6/19/15	0%	Paulo Prado	
161	3.1.3	1.2.3.1.2	Present new charters to BSI Board for approval	10d	6/22/15	7/3/15	0%	Paulo Prado	
162	<b>3.1.3</b>	<b>1.2.3.1.3</b>	<b>Implement Risk Committees</b>	<b>30d</b>	<b>7/6/15</b>	<b>8/14/15</b>	<b>0%</b>	<b>Paulo Prado</b>	<b>G. Urbina</b>
163	3.1.3	1.2.3.1.3	For New Committees: first meeting held	30d	7/6/15	8/14/15	0%	Paulo Prado	G. Urbina
164	3.1.3	1.2.3.1.3	For Existing Committees: meeting held under revised committee charter	30d	7/6/15	8/14/15	0%	Paulo Prado	G. Urbina
165	<i>3.1.3</i>	<i>1.2.3.1.4</i>	<i>Milestone: Miami Risk Committee Structure has been implemented</i>	<i>0d</i>	<i>8/14/15</i>	<i>8/14/15</i>	<i>0%</i>	<i>Paulo Prado</i>	
166	<b>3.1.3</b>	<b>1.2.3.2</b>	<b>Miami CRO's Roles and Responsibilities - HR is dependent on ERM</b>	<b>281d?</b>	<b>2/2/15</b>	<b>2/29/16</b>	<b>7%</b>	<b>Paulo Prado</b>	
167	<b>3.1.3</b>	<b>1.2.3.2.1</b>	<b>Formalize Reporting Line to SHUSA CRO</b>	<b>63d</b>	<b>2/3/15</b>	<b>4/30/15</b>	<b>25%</b>	<b>Paulo Prado</b>	
168	3.1.3	1.2.3.2.1	Align Miami CRO Reporting line with SHUSA CRO Reporting Line - formalize reporting line (approval process, updating of org charts.)	63d	2/3/15	4/30/15	25%	Paulo Prado	M. Mancini
169	<b>3.1.3</b>	<b>1.2.3.2.2</b>	<b>BSI HR to align Miami CRO job description with SHUSA CRO job description - trying to determine if someone does these functions today</b>	<b>21d?</b>	<b>2/2/15</b>	<b>3/2/15</b>	<b>5%</b>	<b>Paulo Prado</b>	
170	3.1.3	1.2.3.2.2	CRO Roles & responsibilities - monitoring process	20d	2/2/15	2/27/15	5%	Paulo Prado	M. Mancini
171	3.1.3	1.2.3.2.2	CRO Roles & responsibilities - consolidated risk reporting	20d	2/2/15	2/27/15	5%	Paulo Prado	M. Mancini
172	3.1.3	1.2.3.2.2	CRO Roles & Responsibilites - risk controls	20d	2/2/15	2/27/15	5%	Paulo Prado	M. Mancini
173	3.1.3	1.2.3.2.2	CRO Roles & Responsibilites - reporting process	20d	2/2/15	2/27/15	5%	Paulo Prado	M. Mancini
174	<i>3.1.3</i>	<i>1.2.3.2.2</i>	<i>Milestone: CRO's roles and responsibilities have been identified and implemented</i>	<i>1d?</i>	<i>3/2/15</i>	<i>3/2/15</i>	<i>0%</i>	<i>Paulo Prado</i>	
175	<b>3.1.3</b>	<b>1.2.3.2.3</b>	<b>CRO compensation aligned with objective assessment of risk - 2016</b>	<b>41d</b>	<b>1/4/16</b>	<b>2/29/16</b>	<b>0%</b>	<b>Paulo Prado</b>	<b>M. Mancini</b>
176	3.1.3	1.2.3.2.3	SHUSA ERM to provide performance objectives to BSI	41d	1/4/16	2/29/16	0%	Paulo Prado	I. Fuentes / L. Madariaga
177	3.1.3	1.2.3.2.3	BSI ERM to review performance objectives to identify what changes may be needed	41d	1/4/16	2/29/16	0%	Paulo Prado	M. Mancini
178	3.1.3	1.2.3.2.3	BSI ERM to work with BSI HR to cascade down objectives to risk management employees.	41d	1/4/16	2/29/16	0%	Paulo Prado	M. Mancini
179	<b>3.1.4</b>	<b>1.2.4</b>	<b>New York</b>	<b>76d</b>	<b>4/10/15</b>	<b>7/24/15</b>	<b>0%</b>	<b>Jim Bathon</b>	
180	<b>3.1.4</b>	<b>1.2.4.1</b>	<b>Establish Risk Management Committees to support CUSO</b>	<b>76d</b>	<b>4/10/15</b>	<b>7/24/15</b>	<b>0%</b>	<b>Jim Bathon</b>	
181	<b>3.1.4</b>	<b>1.2.4.1.1</b>	<b>Determine Committee Structure and Charters</b>	<b>40d</b>	<b>6/1/15</b>	<b>7/24/15</b>	<b>0%</b>	<b>Jim Bathon</b>	
182	<b>3.1.4</b>	<b>1.2.4.1.1</b>	<b>Santander Investment Securities</b>	<b>40d</b>	<b>6/1/15</b>	<b>7/24/15</b>	<b>0%</b>	<b>Jim Bathon</b>	



ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
183	3.1.4	1.2.4.1.1	Validate that the ERM risk committee charters for the respective SIS committees align with the SHUSA committee charters and membership in order to provide the SHUSA CRO with sufficient oversight and accountability for the combined risk of SH	10d	6/1/15	6/12/15	0%	Jim Bathon	
184	3.1.4	1.2.4.1.1	Validate that the NY Management Committees include a section on independence of the various Risk Management functions as well as independence criteria in regards to the risk management voting members of the committee	10d	6/15/15	6/26/15	0%	Jim Bathon	
185	3.1.4	1.2.4.1.1	Coordinate with the Legal Area the review of the changes to the charters	10d	6/29/15	7/10/15	0%	Jim Bathon	
186	3.1.4	1.2.4.1.1	Ensure proper final approval of the charter changes (Board of Director)	10d	7/13/15	7/24/15	0%	Jim Bathon	
187	<b>3.1.4</b>	<b>1.2.4.1.1</b>	<b>Santander New York Branch</b>	<b>40d</b>	<b>6/1/15</b>	<b>7/24/15</b>	<b>0%</b>	<b>Jim Bathon</b>	
188	3.1.4	1.2.4.1.1	Validate that the risk committee charters for the respective NY Br committees align with the SHUSA committee charters in order to provide the SHUSA CRO with sufficient oversight and accountability for the combined risk of SHUSA and NY Br	10d	6/1/15	6/12/15	0%	Jim Bathon	
189	3.1.4	1.2.4.1.1	Validate that the NY Risk Committees include a section on independence of the various Risk Management functions as well as independence criteria in regards to the risk management voting members of the committee	10d	6/15/15	6/26/15	0%	Jim Bathon	
190	3.1.4	1.2.4.1.1	Coordinate with the Legal Area the review of the changes to the charters	10d	6/29/15	7/10/15	0%	Jim Bathon	
191	3.1.4	1.2.4.1.1	Ensure proper final approval of the charter changes (Banco Santander S.A - for review and approval?)	10d	7/13/15	7/24/15	0%	Jim Bathon	
192	<i>3.1.4</i>	<i>1.2.4.1.2</i>	<i>1.1.3.1.1.3 Milestone: Risk Management Committee Structure Updated for CUSO</i>	<i>0d</i>	<i>4/10/15</i>	<i>4/10/15</i>	<i>0%</i>	<i>Jim Bathon</i>	
193	<i>3.1.4</i>	<i>1.2.4.1.3</i>	<i>1.1.3.1.1.4 Milestone: Implementation of the updated committees at SIS and NY Branch</i>	<i>0d</i>	<i>4/10/15</i>	<i>4/10/15</i>	<i>0%</i>	<i>Jim Bathon</i>	
194	<b>3.1.4</b>	<b>1.2.4.2</b>	<b>1.1.3.2 New York Chief Risk Officer (SIS and NY Branch) roles and responsibilities</b>	<b>21d</b>	<b>6/1/15</b>	<b>6/29/15</b>	<b>0%</b>	<b>Jim Bathon</b>	
195	<b>3.1.4</b>	<b>1.2.4.2.1</b>	<b>1.1.3.3.1 Update NY CRO Roles and Responsibilities to support the CUSO</b>	<b>21d</b>	<b>6/1/15</b>	<b>6/29/15</b>	<b>0%</b>	<b>Jim Bathon</b>	
196	3.1.4	1.2.4.2.1	1.1.3.3.1.1 Align the SIS and NY Branch CRO job description (responsibilities of local CRO office) with US CRO for applicable areas of responsibility	10d	6/1/15	6/12/15	0%	Jim Bathon	
197	3.1.4	1.2.4.2.1	1.1.3.3.1.2 Formalize (document and communicate) the NY CRO's reporting lines to both the SHUSA CRO and the New York CEO - need to identify process to formalize reporting line (e.g. US CRO input into local CRO performance review.)	10d	6/15/15	6/26/15	0%	Jim Bathon	
198	3.1.4	1.2.4.2.1	1.1.3.3.1.3 Milestone: Signoff/Approval of US CRO Roles and Responsibilities	1d	6/29/15	6/29/15	0%	Jim Bathon	
199	<b>3.1.4</b>	<b>1.2.4.2.2</b>	<b>1.1.3.3.2 Update NY CRO Compensation to align with that of SHUSA / US CRO</b>	<b>21d</b>	<b>6/1/15</b>	<b>6/29/15</b>	<b>0%</b>	<b>Jim Bathon</b>	
200	3.1.4	1.2.4.2.2	1.1.3.3.2.1 SHUSA CRO to work with the NY CRO to determine performance objectives of the NY CRO	10d	6/1/15	6/12/15	0%	Jim Bathon	
201	3.1.4	1.2.4.2.2	1.1.3.3.2.2 Update the NY CRO's compensation determination process to to take into account performance objectives and performance tracking processes (risk performance scorecard) as determined by the SHUSA CRO and SHUSA HR	10d	6/15/15	6/26/15	0%	Jim Bathon	

ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
202	3.1.4	1.2.4.2.2	1.1.3.3.2.3 Milestone: Signoff/Approval of NY CRO Compensation	1d	6/29/15	6/29/15	0%	Jim Bathon	
203		<b>1.3</b>	<b>Establishing the Enterprise Risk Management Framework</b>	<b>578d?</b>	<b>10/15/14</b>	<b>12/30/16</b>	<b>39%</b>	<b>Ignacio Fuentes</b>	
204	<b>3.1.1</b>	<b>1.3.1</b>	<b>SHUSA</b>	<b>578d</b>	<b>10/15/14</b>	<b>12/30/16</b>	<b>48%</b>	<b>Ignacio Fuentes</b>	
205	3.1.1	1.3.1.1	Revise and Approve Policy Administration document for SHUSA	142d	10/15/14	4/30/15	100%	Ignacio Fuentes	Mark Pfeifer
206	<b>3.1.1</b>	<b>1.3.1.2</b>	<b>Enhance SHUSA ERM Framework</b>	<b>316d</b>	<b>10/15/14</b>	<b>12/31/15</b>	<b>75%</b>	<b>Ignacio Fuentes</b>	
207	<b>3.1.1</b>	<b>1.3.1.2.1</b>	<b>Develop complete gap analysis against regulatory Standards:</b>	<b>26d</b>	<b>10/15/14</b>	<b>11/19/14</b>	<b>100%</b>	<b>Ignacio Fuentes</b>	
208	3.1.1	1.3.1.2.1	Enhance SHUSA Framework, taking into consideration regulatory guidance as included in SR 08-09 on: (1) control infrastructure and governance, including oversight by senior management and (2) development and maintenance	22d	10/15/14	11/13/14	100%	Ignacio Fuentes	Mark Pfeifer
209	3.1.1	1.3.1.2.1	Update SHUSA ERM Framework to clearly articulate the reporting responsibilities related to changes in material risk, risk management deficiencies, emerging risks, and reporting lines	13d	10/30/14	11/15/14	100%	Ignacio Fuentes	Mark Pfeifer
210	3.1.1	1.3.1.2.1	Modify SHUSA Enterprise Risk Management to ensure that the corporate risk management, compliance and Internal Audit control functions are effective and independent	23d	10/20/14	11/19/14	100%	Ignacio Fuentes	Mark Pfeifer
211	3.1.1	1.3.1.2.1	The ERM Framework have to include the mandate that the Management of risk and risk controls have to be within the parameters of the risk control framework for the combined US operations and the monitoring and testing of such risk controls	13d	10/30/14	11/15/14	100%	Ignacio Fuentes	Mark Pfeifer
212	3.1.1	1.3.1.2.1	The ERM Framework have to include the mandate to report and of risk reporting and risk management deficiencies of the combined US operations, and resolve such risk management deficiencies in a timely manner	13d	10/30/14	11/15/14	100%	Ignacio Fuentes	Mark Pfeifer
213	3.1.1	1.3.1.2.1	The ERM Framework has to include Processes and Systems for Establishing Managerial & Employee Responsibilities	13d	10/30/14	11/15/14	100%	Ignacio Fuentes	Mark Pfeifer
214	3.1.1	1.3.1.2.1	The ERM Framework has to include Processes and Systems for the Independence of Risk Management	13d	10/30/14	11/15/14	100%	Ignacio Fuentes	Mark Pfeifer
215	3.1.1	1.3.1.2.1	Ensure ERM Framework and RTS is consistent with Risk ID and Assessment at SHUSA	13d	10/30/14	11/15/14	100%	Ignacio Fuentes	Mark Pfeifer
216	3.1.1	1.3.1.2.1	Revise the ERM Framework to include any other requirement based on the gap analysis	13d	10/30/14	11/15/14	100%	Ignacio Fuentes	Mark Pfeifer
217	3.1.1	1.3.1.2.2	Complete SHUSA ERM Framework	11d	11/15/14	11/28/14	100%	Ignacio Fuentes	Mark Pfeifer
218	<i>3.1.1</i>	<i>1.3.1.2.3</i>	<i>Milestone: Obtain approval of the SHUSA ERM Framework - BERC</i>	<i>0d</i>	<i>1/29/15</i>	<i>1/29/15</i>	<i>100%</i>	<i>Ignacio Fuentes</i>	<i>Mark Pfeifer</i>
219	<i>3.1.1</i>	<i>1.3.1.2.4</i>	<i>Milestone: Obtain approval of the SHUSA ERM Framework - Board</i>	<i>56d</i>	<i>1/30/15</i>	<i>1/30/15</i>	<i>100%</i>	<i>Ignacio Fuentes</i>	<i>Mark Pfeifer</i>
220	<b>3.1.1</b>	<b>1.3.1.2.5</b>	<b>Validate and test implementation of the ERM Framework in SHUSA</b>	<b>88d</b>	<b>8/31/15</b>	<b>12/31/15</b>	<b>0%</b>	<b>Ignacio Fuentes</b>	
221	3.1.1	1.3.1.2.5	Elaborate process to ensure implementation of the ERM Framework - deliverable: attestation document from each of the risk managers to confirm that they have implemented the ERM framework, risk type framework, and enterprise policies	21d	8/31/15	9/28/15	0%	Ignacio Fuentes	Mark Pfeifer

ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
222	3.1.1	1.3.1.2.5	Develop templates and process for completing control self-assessment - dependent on building out policy program	12d	9/29/15	10/14/15	0%	Ignacio Fuentes	Mark Pfeifer
223	3.1.1	1.3.1.2.5	Develop and perform second line of defense training on control self-assessment	12d	10/15/15	10/30/15	0%	Ignacio Fuentes	Mark Pfeifer
224	3.1.1	1.3.1.2.5	Test Implementation of the ERM Framework including three lines of defense model	22d	11/2/15	12/1/15	0%	Ignacio Fuentes	Mark Pfeifer
225	3.1.1	1.3.1.2.5	Milestone: ERM Framework Implemented	0d	12/31/15	12/31/15	0%	Ignacio Fuentes	Mark Pfeifer
226	3.1.1	1.3.1.3	Risk Type Framework, Enterprise and Operating Policies and Procedures alignment	560d	11/10/14	12/30/16	42%	Ignacio Fuentes	
227	3.1.1	1.3.1.3.1	Framework and Enterprise Policies: documents inventory, approvals and implementation	560d	11/10/14	12/30/16	42%	Ignacio Fuentes	
228	3.1.1	1.3.1.3.1	Coordinate Communication of results of Promontory Gap Assessment on Risk Specific Frameworks	34d	12/1/14	1/15/15	100%		
229	3.1.1	1.3.1.3.1	Document Inventory of Frameworks by type of Risk and ERM Policies	30d	12/3/14	2/27/15	100%	Ignacio Fuentes	Mark Pfeifer
230	3.1.1	1.3.1.3.1	Obtain Results of Promontory Gap Assessment on Risk Architecture Enterprise Policies	34d	12/1/14	1/15/15	100%	Ignacio Fuentes	
231	3.1.1	1.3.1.3.1	Reputational Risk Policy	34d	12/1/14	1/15/15	100%	Ignacio Fuentes	
232	3.1.1	1.3.1.3.1	Enterprise Risk Framework	34d	12/1/14	1/15/15	100%	Ignacio Fuentes	
233	3.1.1	1.3.1.3.1	Risk Tolerance Statement	34d	12/1/14	1/15/15	100%	Ignacio Fuentes	
234	3.1.1	1.3.1.3.1	Strategic Risk Policy	34d	12/1/14	1/15/15	100%	Ignacio Fuentes	
235	3.1.1	1.3.1.3.1	Ensure all other Enterprise Policy owners obtain results of Promontory Gap Assessment on Enterprise Policies	34d	12/1/14	1/15/15	100%		
236	3.1.1	1.3.1.3.1	Code of Conduct and Ethics - Michael Wilcox	34d	12/1/14	1/15/15	100%		
237	3.1.1	1.3.1.3.1	Credit Risk Policy - Alfonso de Castro	34d	12/1/14	1/15/15	100%		
238	3.1.1	1.3.1.3.1	Enterprise Liquidity Policy - Juan Carlos Alvarez	34d	12/1/14	1/15/15	100%		
239	3.1.1	1.3.1.3.1	Liquidity Policy - Juan Carlos Alvarez	34d	12/1/14	1/15/15	100%		
240	3.1.1	1.3.1.3.1	Capital Policy - Jorge Garcia	34d	12/1/14	1/15/15	100%		
241	3.1.1	1.3.1.3.1	IRR Policy - Manolo Lasso	34d	12/1/14	1/15/15	100%		
242	3.1.1	1.3.1.3.1	Market Risk Operating Policy - Manolo Lasso	34d	12/1/14	1/15/15	100%		
243	3.1.1	1.3.1.3.1	Market Risk Policy - Manolo Lasso	34d	12/1/14	1/15/15	100%		
244	3.1.1	1.3.1.3.1	Model Risk Policy - Edward Smith	34d	12/1/14	1/15/15	100%		
245	3.1.1	1.3.1.3.1	Business Continuity & Disaster Recovery Planning - Steve Bhatti	34d	12/1/14	1/15/15	100%		
246	3.1.1	1.3.1.3.1	Information Risk Management - Steve Bhatti	34d	12/1/14	1/15/15	100%		
247	3.1.1	1.3.1.3.1	Operational Risk Policy - Steve Bhatti	34d	12/1/14	1/15/15	100%		
248	3.1.1	1.3.1.3.1	Product Commercialization Policy - Steven Lucier	34d	12/1/14	1/15/15	100%		
249	3.1.1	1.3.1.3.1	Obtain results of Promontory Gap Assessment on Risk Management Documentation	13d	4/1/15	4/17/15	0%		
250	3.1.1	1.3.1.3.1	Obtain Results of Promontory Gap Assessment on Risk Architecture Enterprise Policies	13d	4/1/15	4/17/15	0%	Ignacio Fuentes	
251	3.1.1	1.3.1.3.1	Reputational Risk Policy	13d	4/1/15	4/17/15	0%	Ignacio Fuentes	

ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
252	3.1.1	1.3.1.3.1	Enterprise Risk Framework	13d	4/1/15	4/17/15	0%	Ignacio Fuentes	
253	3.1.1	1.3.1.3.1	Risk Tolerance Statement	13d	4/1/15	4/17/15	0%	Ignacio Fuentes	
254	3.1.1	1.3.1.3.1	Strategic Risk Policy	13d	4/1/15	4/17/15	0%	Ignacio Fuentes	
255	<b>3.1.1</b>	<b>1.3.1.3.1</b>	<b>Ensure all other Enterprise Policy owners obtain results of Promontory Gap Assessment on Enterprise Policies</b>	<b>13d</b>	<b>4/1/15</b>	<b>4/17/15</b>	<b>0%</b>		
256	3.1.1	1.3.1.3.1	Code of Conduct and Ethics - Michael Wilcox	13d	4/1/15	4/17/15	0%		
257	3.1.1	1.3.1.3.1	Credit Risk Policy - Alfonso de Castro	13d	4/1/15	4/17/15	0%		
258	3.1.1	1.3.1.3.1	Enterprise Liquidity Policy - Juan Carlos Alvarez	13d	4/1/15	4/17/15	0%		
259	3.1.1	1.3.1.3.1	Liquidity Policy - Juan Carlos Alvarez	13d	4/1/15	4/17/15	0%		
260	3.1.1	1.3.1.3.1	Capital Policy - Jorge Garcia	13d	4/1/15	4/17/15	0%		
261	3.1.1	1.3.1.3.1	IRR Policy - Manolo Lasso	13d	4/1/15	4/17/15	0%		
262	3.1.1	1.3.1.3.1	Market Risk Operating Policy - Manolo Lasso	13d	4/1/15	4/17/15	0%		
263	3.1.1	1.3.1.3.1	Market Risk Policy - Manolo Lasso	13d	4/1/15	4/17/15	0%		
264	3.1.1	1.3.1.3.1	Model Risk Policy - Edward Smith	13d	4/1/15	4/17/15	0%		
265	3.1.1	1.3.1.3.1	Business Continuity & Disaster Recovery Planning - Steve Bhatti	13d	4/1/15	4/17/15	0%		
266	3.1.1	1.3.1.3.1	Information Risk Management - Steve Bhatti	13d	4/1/15	4/17/15	0%		
267	3.1.1	1.3.1.3.1	Operational Risk Policy - Steve Bhatti	13d	4/1/15	4/17/15	0%		
268	3.1.1	1.3.1.3.1	Product Commercialization Policy - Steven Lucier	13d	4/1/15	4/17/15	0%		
269	<b>3.1.1</b>	<b>1.3.1.3.1</b>	<b>Coordinate the update of the Risk Management Area gap project plans - ensure that the RMAs have incorporated the remediation of the gaps within their project plans</b>	<b>29d</b>	<b>4/20/15</b>	<b>5/28/15</b>	<b>0%</b>		
270	3.1.1	1.3.1.3.1	Risk Architecture Owned Policies	29d	4/20/15	5/28/15	0%		
271	3.1.1	1.3.1.3.1	All other Risk Policies	29d	4/20/15	5/28/15	0%		
272	<i>3.1.1</i>	<i>1.3.1.3.1</i>	<i>Milestone: Risk Management Area project plans include tasks to remediate gaps identified by PFG</i>	<i>0d</i>	<i>6/26/15</i>	<i>6/26/15</i>	<i>0%</i>		
273	<b>3.1.1</b>	<b>1.3.1.3.1</b>	<b>Validate Gap Assessment - receive approval from Risk Mgmt Areas on gap assessment;</b>	<b>25d</b>	<b>1/12/15</b>	<b>2/13/15</b>	<b>100%</b>	<b>Ignacio Fuentes</b>	
274	3.1.1	1.3.1.3.1	Assign functional heads and policy owners to validate identified regulatory gaps and weaknesses	5d	1/12/15	1/16/15	100%	Ignacio Fuentes	PMO
275	<b>3.1.1</b>	<b>1.3.1.3.1</b>	<b>Risk Architecture Owned Policies</b>	<b>15d</b>	<b>1/26/15</b>	<b>2/13/15</b>	<b>100%</b>	<b>Ignacio Fuentes</b>	
276	3.1.1	1.3.1.3.1	Strategic Risk	15d	1/26/15	2/13/15	100%		
277	3.1.1	1.3.1.3.1	Reputational Risk	15d	1/26/15	2/13/15	100%		
278	<b>3.1.1</b>	<b>1.3.1.3.1</b>	<b>Other Risk Policies</b>	<b>15d</b>	<b>1/26/15</b>	<b>2/13/15</b>	<b>100%</b>		
279	3.1.1	1.3.1.3.1	Credit Risk	15d	1/26/15	2/13/15	100%		
280	3.1.1	1.3.1.3.1	Market / IR Risk	15d	1/26/15	2/13/15	100%		
281	3.1.1	1.3.1.3.1	Compliance	15d	1/26/15	2/13/15	100%		
282	3.1.1	1.3.1.3.1	Operational Risk	15d	1/26/15	2/13/15	100%		
283	3.1.1	1.3.1.3.1	Liquidity	15d	1/26/15	2/13/15	100%		
284	3.1.1	1.3.1.3.1	Model Risk	15d	1/26/15	2/13/15	100%		
285	<b>3.1.1</b>	<b>1.3.1.3.1</b>	<b>Develop Remediation Plan</b>	<b>10d</b>	<b>2/16/15</b>	<b>2/27/15</b>	<b>100%</b>	<b>Ignacio Fuentes</b>	
286	<b>3.1.1</b>	<b>1.3.1.3.1</b>	<b>Risk Architecture Owned Policies</b>	<b>10d</b>	<b>2/16/15</b>	<b>2/27/15</b>	<b>100%</b>	<b>Ignacio Fuentes</b>	

ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
287	3.1.1	1.3.1.3.1	Strategic Risk	10d	2/16/15	2/27/15	100%		
288	3.1.1	1.3.1.3.1	Reputational Risk	10d	2/16/15	2/27/15	100%		
289	<b>3.1.1</b>	<b>1.3.1.3.1</b>	<b>Other Risk Policies</b>	<b>10d</b>	<b>2/16/15</b>	<b>2/27/15</b>	<b>100%</b>		
290	3.1.1	1.3.1.3.1	Credit Risk	10d	2/16/15	2/27/15	100%		
291	3.1.1	1.3.1.3.1	Market / IR Risk	10d	2/16/15	2/27/15	100%		
292	3.1.1	1.3.1.3.1	Compliance	10d	2/16/15	2/27/15	100%		
293	3.1.1	1.3.1.3.1	Operational Risk	10d	2/16/15	2/27/15	100%		
294	3.1.1	1.3.1.3.1	Liquidity	10d	2/16/15	2/27/15	100%		
295	3.1.1	1.3.1.3.1	Model Risk	10d	2/16/15	2/27/15	100%		
296	<b>3.1.1</b>	<b>1.3.1.3.1</b>	<b>Execute ERM policy and procedure remediation</b>	<b>501d</b>	<b>1/30/15</b>	<b>12/30/16</b>	<b>6%</b>	<b>Ignacio Fuentes</b>	
297	3.1.1	1.3.1.3.1	Develop and implement progress reporting against ERM policy and procedure remediation	10d	2/23/15	3/6/15	100%	Ignacio Fuentes	Risk PMO
298	<b>3.1.1</b>	<b>1.3.1.3.1</b>	<b>Update risk management policies and procedures at SHUSA</b>	<b>501d</b>	<b>1/30/15</b>	<b>12/30/16</b>	<b>5%</b>	<b>ALL BHC / ALL RA'S</b>	
299	<b>3.1.1</b>	<b>1.3.1.3.1</b>	<b>Update, approve, and implement all SHUSA risk management policies as revisions are completed (TBD: Estimated Resources pending remediation efforts required)</b>	<b>219d</b>	<b>3/2/15</b>	<b>12/31/15</b>	<b>10%</b>	<b>Ignacio Fuentes</b>	<b>ALL BHC / ALL RA'S</b>
300	3.1.1	1.3.1.3.1	Revise the roles and responsibilities sections within SHUSA's policies as part of the ERM policy and procedure remediation [see MRIA 3(b)]	219d	3/2/15	12/31/15	10%	Ignacio Fuentes	SHUSA RMs
301	<b>3.1.1</b>	<b>1.3.1.3.1</b>	<b>Risk Architecture Owned Policies</b>	<b>85d</b>	<b>3/16/15</b>	<b>7/10/15</b>	<b>10%</b>	<b>Ignacio Fuentes</b>	
302	<b>3.1.1</b>	<b>1.3.1.3.1</b>	<b>Strategic Risk</b>	<b>85d</b>	<b>3/16/15</b>	<b>7/10/15</b>	<b>10%</b>		
303	3.1.1	1.3.1.3.1	Gather information on comparable language	12d	3/16/15	3/31/15	100%	Mark Pfeifer	
304	3.1.1	1.3.1.3.1	Draft / Update policy	10d	3/30/15	4/10/15	50%	Mark Pfeifer	
305	3.1.1	1.3.1.3.1	Review Policy with Stakeholders	5d	4/13/15	4/17/15	0%	Mark Pfeifer	
306	3.1.1	1.3.1.3.1	Update policy based on feedback	5d	4/20/15	4/24/15	0%	Mark Pfeifer	
307	3.1.1	1.3.1.3.1	Provide policy to EPA for review	5d	4/27/15	5/1/15	0%	Mark Pfeifer	
308	3.1.1	1.3.1.3.1	Update based on EPA feedback	5d	5/4/15	5/8/15	0%	Mark Pfeifer	
309	3.1.1	1.3.1.3.1	Provide to ERMC for review	5d	5/11/15	5/15/15	0%	Mark Pfeifer	
310	3.1.1	1.3.1.3.1	Update based on ERMC feedback	3d	5/18/15	5/20/15	0%	Mark Pfeifer	
311	3.1.1	1.3.1.3.1	EPA Certification	5d	5/21/15	5/27/15	0%	Mark Pfeifer	
312	3.1.1	1.3.1.3.1	BERC Approval	1d	5/28/15	5/28/15	0%	Mark Pfeifer	
313	3.1.1	1.3.1.3.1	Board Approval	1d	5/29/15	5/29/15	0%	Mark Pfeifer	

ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
314	<b>3.1.1</b>	<b>1.3.1.3.1</b>	<b>Provide to IHC entities for review</b>	<b>30d</b>	<b>6/1/15</b>	<b>7/10/15</b>	<b>0%</b>	<b>Mark Pfeifer</b>	
315	3.1.1	1.3.1.3.1	Puerto Rico (BSBC, BSPR, SIA, SS, SFS, SOB)	30d	6/1/15	7/10/15	0%	Mark Pfeifer	
316	3.1.1	1.3.1.3.1	Miami	30d	6/1/15	7/10/15	0%	Mark Pfeifer	
317	3.1.1	1.3.1.3.1	New York	30d	6/1/15	7/10/15	0%	Mark Pfeifer	
318	3.1.1	1.3.1.3.1	Other Entities (ANTSUS, SAM, Totta)	30d	6/1/15	7/10/15	0%	Mark Pfeifer	
319	<b>3.1.1</b>	<b>1.3.1.3.1</b>	<b>Reputational Risk</b>	<b>85d</b>	<b>3/16/15</b>	<b>7/10/15</b>	<b>10%</b>	<b>Mark Pfeifer</b>	
320	3.1.1	1.3.1.3.1	Gather information on comparable language	12d	3/16/15	3/31/15	100%	Mark Pfeifer	
321	3.1.1	1.3.1.3.1	Draft / Update policy	10d	3/30/15	4/10/15	50%	Mark Pfeifer	
322	3.1.1	1.3.1.3.1	Review Policy with Stakeholders	5d	4/13/15	4/17/15	0%	Mark Pfeifer	
323	3.1.1	1.3.1.3.1	Update policy based on feedback	5d	4/20/15	4/24/15	0%	Mark Pfeifer	
324	3.1.1	1.3.1.3.1	Provide policy to EPA for review	5d	4/27/15	5/1/15	0%	Mark Pfeifer	
325	3.1.1	1.3.1.3.1	Update based on EPA feedback	5d	5/4/15	5/8/15	0%	Mark Pfeifer	
326	3.1.1	1.3.1.3.1	Provide to ERM C for review	5d	5/11/15	5/15/15	0%	Mark Pfeifer	
327	3.1.1	1.3.1.3.1	Update based on ERM C feedback	3d	5/18/15	5/20/15	0%	Mark Pfeifer	
328	3.1.1	1.3.1.3.1	EPA Certification	5d	5/21/15	5/27/15	0%	Mark Pfeifer	
329	3.1.1	1.3.1.3.1	BERC Approval	1d	5/28/15	5/28/15	0%	Mark Pfeifer	
330	3.1.1	1.3.1.3.1	Board Approval	1d	5/29/15	5/29/15	0%	Mark Pfeifer	
331	<b>3.1.1</b>	<b>1.3.1.3.1</b>	<b>Provide to IHC entities for review</b>	<b>30d</b>	<b>6/1/15</b>	<b>7/10/15</b>	<b>0%</b>	<b>Mark Pfeifer</b>	
332	3.1.1	1.3.1.3.1	Puerto Rico (BSBC, BSPR, SIA, SS, SFS, SOB)	30d	6/1/15	7/10/15	0%	Mark Pfeifer	
333	3.1.1	1.3.1.3.1	Miami	30d	6/1/15	7/10/15	0%	Mark Pfeifer	
334	3.1.1	1.3.1.3.1	New York	30d	6/1/15	7/10/15	0%	Mark Pfeifer	
335	3.1.1	1.3.1.3.1	Other Entities (ANTSUS, SAM, Totta)	30d	6/1/15	7/10/15	0%	Mark Pfeifer	
336	<i>3.1.1</i>	<i>1.3.1.3.1</i>	<i>Milestone: 2016 Enterprise Policies Approved</i>	<i>0d</i>	<i>12/31/15</i>	<i>12/31/15</i>	<i>0%</i>	<i>Ignacio Fuentes</i>	
337	3.1.1	1.3.1.3.1	Complete revisions to risk management procedures (TBD: Estimated Resources pending remediation efforts required)	460d	3/30/15	12/30/16	0%	Ignacio Fuentes	ALL BHC / ALL RA'S



ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
338	3.1.1	1.3.1.3.1	Validate closure of identified regulatory gaps and compliance with Policy Administration Policy (TBD: Estimated Resources pending remediation efforts required)	110d	1/29/16	6/30/16	0%	Ignacio Fuentes	PFG
339	<b>3.1.1</b>	<b>1.3.1.3.1</b>	<b>Hire an ERM Policy Administrator</b>	<b>80d</b>	<b>11/10/14</b>	<b>2/27/15</b>	<b>100%</b>	<b>J. Corston</b>	
340	3.1.1	1.3.1.3.1	Prepare position description for ERM Policy Administrator	9d	11/10/14	11/20/14	100%	Ignacio Fuentes	J. Corston
341	3.1.1	1.3.1.3.1	Post position description	1d	11/21/14	11/21/14	100%	Ignacio Fuentes	HR
342	3.1.1	1.3.1.3.1	Hire ERM Policy Administrator	71d	11/21/14	2/27/15	100%	J. Corston	HR / J. Corston
343	<b>3.1.5</b>	<b>1.3.2</b>	<b>Puerto Rico (BSBC, BSPR, SIA, SS, SFS, SOB)</b>	<b>237d</b>	<b>1/1/15</b>	<b>11/27/15</b>	<b>32%</b>	<b>Juan Pablo Jurado</b>	
344	<b>3.1.5</b>	<b>1.3.2.1</b>	<b>Bancorp ERM Framework Implementation</b>	<b>55d</b>	<b>2/16/15</b>	<b>5/1/15</b>	<b>55%</b>	<b>Juan Pablo Jurado</b>	
345	3.1.5	1.3.2.1.1	GAP analysis against SHUSA ERM Framework	32d	2/16/15	3/31/15	100%	Juan Pablo Jurado	
346	3.1.5	1.3.2.1.2	Update ERM Framework	15d	4/1/15	4/21/15	5%	Juan Pablo Jurado	
347	3.1.5	1.3.2.1.3	Approve ERM Framework	13d	4/15/15	5/1/15	0%	Juan Pablo Jurado	
348	<i>3.1.5</i>	<i>1.3.2.1.4</i>	<i>Milestone: ERM Framework Implemented</i>	<i>0d</i>	<i>5/1/15</i>	<i>5/1/15</i>	<i>0%</i>	<i>Juan Pablo Jurado</i>	
349	<b>3.1.5</b>	<b>1.3.2.2</b>	<b>SFS ERM Framework Implementation</b>	<b>55d</b>	<b>2/16/15</b>	<b>5/1/15</b>	<b>55%</b>	<b>Juan Pablo Jurado</b>	
350	3.1.5	1.3.2.2.1	GAP analysis against SHUSA ERM Framework	32d	2/16/15	3/31/15	100%	Juan Pablo Jurado	
351	3.1.5	1.3.2.2.2	Update ERM Framework	15d	4/1/15	4/21/15	5%	Juan Pablo Jurado	
352	3.1.5	1.3.2.2.3	Approve ERM Framework	13d	4/15/15	5/1/15	0%	Juan Pablo Jurado	
353	<i>3.1.5</i>	<i>1.3.2.2.4</i>	<i>Milestone: ERM Framework Implemented</i>	<i>0d</i>	<i>5/1/15</i>	<i>5/1/15</i>	<i>0%</i>	<i>Juan Pablo Jurado</i>	
354	<b>3.1.5</b>	<b>1.3.2.3</b>	<b>SOB ERM Framework Implementation</b>	<b>55d</b>	<b>2/16/15</b>	<b>5/1/15</b>	<b>55%</b>	<b>Juan Pablo Jurado</b>	
355	3.1.5	1.3.2.3.1	GAP analysis against SHUSA ERM Framework	32d	2/16/15	3/31/15	100%	Juan Pablo Jurado	
356	3.1.5	1.3.2.3.2	Update ERM Framework	15d	4/1/15	4/21/15	5%	Juan Pablo Jurado	
357	3.1.5	1.3.2.3.3	Approve ERM Framework	13d	4/15/15	5/1/15	0%	Juan Pablo Jurado	
358	<i>3.1.5</i>	<i>1.3.2.3.4</i>	<i>Milestone: ERM Framework Implemented</i>	<i>0d</i>	<i>5/1/15</i>	<i>5/1/15</i>	<i>0%</i>	<i>Juan Pablo Jurado</i>	

ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
359	<b>3.1.5</b>	<b>1.3.2.4</b>	<b>Evaluate the need for other controls and processes as a result of Risk ID &amp; Assessment exercise</b>	<b>43d</b>	<b>7/1/15</b>	<b>8/31/15</b>	<b>17%</b>	<b>Juan Pablo Jurado</b>	
360	3.1.5	1.3.2.4.1	Assess how these functions are performed with respect to regulatory expectations	43d	7/1/15	8/28/15	50%	Juan Pablo Jurado	
361	3.1.5	1.3.2.4.2	If changes are required, create a plan to further define and implement the changes	43d	7/1/15	8/28/15	0%	Juan Pablo Jurado	
362	3.1.5	1.3.2.4.3	Implement Changes of Required Control and/or process	43d	7/1/15	8/28/15	0%	Juan Pablo Jurado	
363	<i>3.1.5</i>	<i>1.3.2.4.4</i>	<i>Milestone: New Controls Implemented</i>	<i>0d</i>	<i>8/31/15</i>	<i>8/31/15</i>	<i>0%</i>	<i>Juan Pablo Jurado</i>	
364	<b>3.1.5</b>	<b>1.3.2.5</b>	<b>ERM Frameworks and Policies</b>	<b>18d</b>	<b>9/7/15</b>	<b>9/30/15</b>	<b>0%</b>	<b>Juan Pablo Jurado</b>	
365	3.1.5	1.3.2.5.1	For each required risk area, ensure review of Frameworks and Policies - Bancorp	18d	9/7/15	9/30/15	0%	Juan Pablo Jurado	
366	3.1.5	1.3.2.5.2	For each required risk area, ensure review of Frameworks and Policies - SFS	18d	9/7/15	9/30/15	0%	Juan Pablo Jurado	
367	3.1.5	1.3.2.5.3	For each required risk area, ensure review of Frameworks and Policies - Overseas	18d	9/7/15	9/30/15	0%	Juan Pablo Jurado	
368	<i>3.1.5</i>	<i>1.3.2.5.4</i>	<i>Milestone: ERM has reviewed all Frameworks and Enterprise policies</i>	<i>0d</i>	<i>9/30/15</i>	<i>9/30/15</i>	<i>0%</i>	<i>Juan Pablo Jurado</i>	
369	<b>3.1.5</b>	<b>1.3.2.6</b>	<b>Inventory / Repository - Frameworks, policies and procedures</b>	<b>18d</b>	<b>9/7/15</b>	<b>9/30/15</b>	<b>0%</b>	<b>Juan Pablo Jurado</b>	
370	<b>3.1.5</b>	<b>1.3.2.6.1</b>	<b>Enterprise + Operating Policies</b>	<b>18d</b>	<b>9/7/15</b>	<b>9/30/15</b>	<b>0%</b>	<b>Juan Pablo Jurado</b>	
371	3.1.5	1.3.2.6.1	Identify the inventory of Risk Policies (Enterprise + Operating Policies)	18d	9/7/15	9/30/15	0%	Juan Pablo Jurado	
372	3.1.5	1.3.2.6.1	Provide SHUSA the inventory of Enterprise and Operating Policies	18d	9/7/15	9/30/15	0%	Juan Pablo Jurado	
373	<b>3.1.5</b>	<b>1.3.2.6.2</b>	<b>Main Risk Procedures</b>	<b>18d</b>	<b>9/7/15</b>	<b>9/30/15</b>	<b>0%</b>	<b>Juan Pablo Jurado</b>	
374	3.1.5	1.3.2.6.2	Identify Inventory of the main Risk procedures	18d	9/7/15	9/30/15	0%	Juan Pablo Jurado	
375	3.1.5	1.3.2.6.2	Provide SHUSA the inventory of main Risk Procedures	18d	9/7/15	9/30/15	0%	Juan Pablo Jurado	
376	<b>3.1.5</b>	<b>1.3.2.6.3</b>	<b>Policies and procedures repository</b>	<b>18d</b>	<b>9/7/15</b>	<b>9/30/15</b>	<b>0%</b>	<b>Juan Pablo Jurado</b>	
377	3.1.5	1.3.2.6.3	Update local policy repository (including Frameworks, Policies / Methodologies & Procedures / Guidelines - Risk ID and Risk Tolerance)	18d	9/7/15	9/30/15	0%	Juan Pablo Jurado	
378	3.1.5	1.3.2.6.4	Define a process to ensure policies and frameworks are updated to be in compliance with regulatory requirements	12d	6/15/15	6/30/15	0%	Juan Pablo Jurado	

ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
379	3.1.5	1.3.2.6.5	Determine which enterprise policies will require ERM to coordinate review and approval at the ROC, BERC and the BOD	18d	9/7/15	9/30/15	0%	Juan Pablo Jurado	
380	<i>3.1.5</i>	<i>1.3.2.6.6</i>	<i>Milestone: Inventory of Enterprise Frameworks, Enterprise Policies, and Procedures have been identified and documented</i>	<i>0d</i>	<i>9/30/15</i>	<i>9/30/15</i>	<i>0%</i>	<i>Juan Pablo Jurado</i>	
381	<b>3.1.5</b>	<b>1.3.2.7</b>	<b>Emerging Risks &amp; Other Controls: Close any Process Gaps</b>	<b>130d</b>	<b>6/1/15</b>	<b>11/27/15</b>	<b>0%</b>	<b>Juan Pablo Jurado</b>	
382	<b>3.1.5</b>	<b>1.3.2.7.1</b>	<b>ERM</b>	<b>20d</b>	<b>11/2/15</b>	<b>11/27/15</b>	<b>0%</b>	<b>Juan Pablo Jurado</b>	
383	3.1.5	1.3.2.7.1	Verify if tasks described in the applicable Frameworks, Policies, and/or Procedures are being properly executed	20d	11/2/15	11/27/15	0%	Juan Pablo Jurado	
384	3.1.5	1.3.2.7.1	Develop plans to close any Gaps	20d	11/2/15	11/27/15	0%	Juan Pablo Jurado	
385	3.1.5	1.3.2.7.1	Define processes for each Gap	20d	11/2/15	11/27/15	0%	Juan Pablo Jurado	
386	3.1.5	1.3.2.7.1	Compliance with tasks described in the applicable Frameworks, Policies, and/or Procedures	20d	11/2/15	11/27/15	0%	Juan Pablo Jurado	
387	<b>3.1.5</b>	<b>1.3.2.7.2</b>	<b>Scorecards All Entities</b>	<b>20d</b>	<b>6/1/15</b>	<b>6/26/15</b>	<b>0%</b>	<b>Juan Pablo Jurado</b>	
388	3.1.5	1.3.2.7.2	Verify if tasks described in the applicable Frameworks, Policies, and/or Procedures are being properly executed	20d	6/1/15	6/26/15	0%	Juan Pablo Jurado	
389	3.1.5	1.3.2.7.2	Develop plans to close any Gaps	20d	6/1/15	6/26/15	0%	Juan Pablo Jurado	
390	3.1.5	1.3.2.7.2	Define processes for each Gap	20d	6/1/15	6/26/15	0%	Juan Pablo Jurado	
391	3.1.5	1.3.2.7.2	Compliance with tasks described in the applicable Frameworks, Policies, and/or Procedures	20d	6/1/15	6/26/15	0%	Juan Pablo Jurado	
392	<i>3.1.5</i>	<i>1.3.2.7.3</i>	<i>Milestone: Emerging Risks and Controls Implemented</i>	<i>0d</i>	<i>11/27/15</i>	<i>11/27/15</i>	<i>0%</i>		
393	<b>3.1.5</b>	<b>1.3.2.8</b>	<b>ERM: Risk Management Integration</b>	<b>64d</b>	<b>1/1/15</b>	<b>3/31/15</b>	<b>100%</b>	<b>Juan Pablo Jurado</b>	
394	<b>3.1.5</b>	<b>1.3.2.8.1</b>	<b>Risk Tolerance &amp; Other Monitoring defined by ERM within Risk Policies</b>	<b>64d</b>	<b>1/1/15</b>	<b>3/31/15</b>	<b>100%</b>	<b>Juan Pablo Jurado</b>	
395	<b>3.1.5</b>	<b>1.3.2.8.1</b>	<b>Ensure risk metrics included in the Risk Tolerance Statement are addressed in the operating policies established by each area - Santander Bancorp</b>	<b>64d</b>	<b>1/1/15</b>	<b>3/31/15</b>	<b>100%</b>	<b>Juan Pablo Jurado</b>	
396	3.1.5	1.3.2.8.1	Develop ERM description to include in operating policies	12d	1/1/15	1/16/15	100%	Juan Pablo Jurado	
397	3.1.5	1.3.2.8.1	Define the list of Operating Policies	12d	1/1/15	1/16/15	100%	Juan Pablo Jurado	
398	3.1.5	1.3.2.8.1	ERM Integration into operating policies	22d	3/2/15	3/31/15	100%	Juan Pablo Jurado	
399	<i>3.1.5</i>	<i>1.3.2.8.1</i>	<i>Milestone: Operating Policies updated with ERM roles and responsibilities</i>	<i>0d</i>	<i>3/31/15</i>	<i>3/31/15</i>	<i>100%</i>	<i>Juan Pablo Jurado</i>	

ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
400	<b>3.1.5</b>	<b>1.3.2.8.1</b>	<b>Ensure risk metrics included in the Risk Tolerance Statement are addressed in the operating policies established by each area - Santander Financial Services</b>	<b>32d</b>	<b>2/16/15</b>	<b>3/31/15</b>	<b>100%</b>	<b>Juan Pablo Jurado</b>	
401	3.1.5	1.3.2.8.1	Develop ERM description to include in operating policies	10d	2/16/15	2/27/15	100%	Juan Pablo Jurado	
402	3.1.5	1.3.2.8.1	Define the list of Operating Policies	10d	2/16/15	2/27/15	100%	Juan Pablo Jurado	
403	3.1.5	1.3.2.8.1	ERM Integration into operating policies	22d	3/2/15	3/31/15	100%	Juan Pablo Jurado	
404	<i>3.1.5</i>	<i>1.3.2.8.1</i>	<i>Milestone: Operating Policies updated with ERM roles and responsibilities</i>	<i>0d</i>	<i>3/31/15</i>	<i>3/31/15</i>	<i>100%</i>	<i>Juan Pablo Jurado</i>	
405	<b>3.1.5</b>	<b>1.3.2.8.1</b>	<b>Ensure risk metrics included in the Risk Tolerance Statement are addressed in the operating policies established by each area - Santander Overseas Bank</b>	<b>32d</b>	<b>2/16/15</b>	<b>3/31/15</b>	<b>100%</b>	<b>Juan Pablo Jurado</b>	
406	3.1.5	1.3.2.8.1	Develop ERM description to include in operating policies	10d	2/16/15	2/27/15	100%	Juan Pablo Jurado	
407	3.1.5	1.3.2.8.1	Define the list of Operating Policies	10d	2/16/15	2/27/15	100%	Juan Pablo Jurado	
408	3.1.5	1.3.2.8.1	ERM Integration into operating policies	22d	3/2/15	3/31/15	100%	Juan Pablo Jurado	
409	<i>3.1.5</i>	<i>1.3.2.8.1</i>	<i>Milestone: Operating Policies updated with ERM roles and responsibilities</i>	<i>0d</i>	<i>3/31/15</i>	<i>3/31/15</i>	<i>100%</i>	<i>Juan Pablo Jurado</i>	
410	<b>3.1.3</b>	<b>1.3.3</b>	<b>Miami</b>	<b>254d</b>	<b>1/12/15</b>	<b>1/1/16</b>	<b>35%</b>	<b>Lourdes Madariaga</b>	
411	<b>3.1.3</b>	<b>1.3.3.1</b>	<b>Review SHUSA ERM Framework</b>	<b>87d</b>	<b>3/3/15</b>	<b>7/2/15</b>	<b>40%</b>	<b>Paulo Prado</b>	
412	<b>3.1.3</b>	<b>1.3.3.1.1</b>	<b>Update BSI ERM Framework to ensure alignment with SHUSA ERM Framework</b>	<b>79d</b>	<b>3/3/15</b>	<b>6/19/15</b>	<b>44%</b>	<b>Paulo Prado</b>	
413	3.1.3	1.3.3.1.1	Obtain gap assessment from SHUSA and apply to BSI	10d	3/3/15	3/16/15	100%		
414	3.1.3	1.3.3.1.1	Determine how Fiduciary Risk should be incorporated into the BSI ERM Framework	34d	3/16/15	4/30/15	75%	Paulo Prado	L. Madariaga
415	3.1.3	1.3.3.1.1	Ensure BSI assessment is in compliance with requirements detailed in SR 96-10	22d	5/1/15	5/31/15	0%	Paulo Prado	L. Madariaga
416	3.1.3	1.3.3.1.1	Review draft of Miami ERM Framework with SHUSA ERM for additional feedback	15d	6/1/15	6/19/15	0%	Paulo Prado	I. Fuentes / L. Madariaga
417	3.1.3	1.3.3.1.2	Approve Miami ERM Framework frin BSI's Audit and Risk Committee and Ratification by BSI's BOD.	8d	6/22/15	7/1/15	0%	Paulo Prado	L. Madariaga
418	<i>3.1.3</i>	<i>1.3.3.1.3</i>	<i>Milestone: BSI ERM Framework Implemented</i>	<i>0d</i>	<i>7/2/15</i>	<i>7/2/15</i>	<i>0%</i>	<i>Paulo Prado</i>	
419	<b>3.1.3</b>	<b>1.3.3.2</b>	<b>Create a Policy Governance process</b>	<b>254d</b>	<b>1/12/15</b>	<b>1/1/16</b>	<b>35%</b>	<b>Paulo Prado</b>	
420	<b>3.1.3</b>	<b>1.3.3.2.1</b>	<b>BSI to adopt similar process as SHUSA: (1) Legal Department responsible for policy on policies. (2) coordinate with Risk Mgt policy administrator</b>	<b>26d</b>	<b>1/12/15</b>	<b>2/16/15</b>	<b>100%</b>	<b>Paulo Prado</b>	

ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
421	3.1.3	1.3.3.2.1	Assess the need for a Risk Management Policy Administrator at BSI	26d	1/12/15	2/16/15	100%	Paulo Prado	L. Madariaga
422	<b>3.1.3</b>	<b>1.3.3.2.2</b>	<b>Create an inventory of Risk Management Frameworks and ERM Policies: documents inventory, approvals and implementation</b>	<b>207d</b>	<b>2/16/15</b>	<b>12/1/15</b>	<b>72%</b>	<b>Paulo Prado</b>	
423	<b>3.1.3</b>	<b>1.3.3.2.2</b>	<b>Identify a repository to post all BSI Risk Management Frameworks and ERM, Compliance, Model policies</b>	<b>16d</b>	<b>2/16/15</b>	<b>3/9/15</b>	<b>76%</b>	<b>Paulo Prado</b>	<b>L. Madariaga</b>
424	<b>3.1.3</b>	<b>1.3.3.2.2</b>	<b>Post Enterprise Policies to shared drive</b>	<b>16d</b>	<b>2/16/15</b>	<b>3/9/15</b>	<b>73%</b>	<b>Paulo Prado</b>	<b>L. Madariaga</b>
425	<b>3.1.3</b>	<b>1.3.3.2.2</b>	<b>2014</b>	<b>16d</b>	<b>2/16/15</b>	<b>3/9/15</b>	<b>84%</b>	<b>Paulo Prado</b>	<b>L. Madariaga</b>
426	3.1.3	1.3.3.2.2	Code of Conduct and Ethics	16d	2/16/15	3/9/15	100%	Paulo Prado	L. Madariaga
427	3.1.3	1.3.3.2.2	Enterprise Credit Risk Policy	16d	2/16/15	3/9/15	100%	Paulo Prado	L. Madariaga
428	3.1.3	1.3.3.2.2	Enterprise Liquidity Policy	16d	2/16/15	3/9/15	100%	Paulo Prado	L. Madariaga
429	3.1.3	1.3.3.2.2	Capital Policy	16d	2/16/15	3/9/15	0%	Paulo Prado	L. Madariaga
430	3.1.3	1.3.3.2.2	IRR Policy	16d	2/16/15	3/9/15	100%	Paulo Prado	L. Madariaga
431	3.1.3	1.3.3.2.2	Enterprise Market Risk Policy	16d	2/16/15	3/9/15	100%	Paulo Prado	L. Madariaga
432	3.1.3	1.3.3.2.2	Enterprise Model Risk Policy	16d	2/16/15	3/9/15	100%	Paulo Prado	L. Madariaga
433	3.1.3	1.3.3.2.2	Business Continuity & Disaster Recovery Planning	16d	2/16/15	3/9/15	0%	Paulo Prado	L. Madariaga
434	3.1.3	1.3.3.2.2	Information Risk Management	16d	2/16/15	3/9/15	0%	Paulo Prado	L. Madariaga
435	3.1.3	1.3.3.2.2	Operational Risk Policy	16d	2/16/15	3/9/15	100%	Paulo Prado	L. Madariaga
436	3.1.3	1.3.3.2.2	Product Commercialization Policy	16d	2/16/15	3/9/15	100%	Paulo Prado	L. Madariaga
437	3.1.3	1.3.3.2.2	Reputational Risk Policy	16d	2/16/15	3/9/15	100%	Paulo Prado	L. Madariaga
438	3.1.3	1.3.3.2.2	Risk Tolerance Statement	16d	2/16/15	3/9/15	100%	Paulo Prado	L. Madariaga
439	3.1.3	1.3.3.2.2	Strategic Risk Policy	16d	2/16/15	3/9/15	100%	Paulo Prado	L. Madariaga
440	3.1.3	1.3.3.2.2	Policy on Policies	16d	2/16/15	3/9/15	100%	Paulo Prado	L. Madariaga
441	3.1.3	1.3.3.2.2	BSA / AML Policy	16d	2/16/15	3/9/15	100%	Paulo Prado	L. Madariaga
442	3.1.3	1.3.3.2.2	BSI Risk Framework	16d	2/16/15	3/9/15	100%	Paulo Prado	L. Madariaga
443	3.1.3	1.3.3.2.2	Enterprise Issue Management Policy	16d	2/16/15	3/9/15	100%	Paulo Prado	L. Madariaga
444	3.1.3	1.3.3.2.2	Enterprise Third Party Provider Risk Management Policy	16d	2/16/15	3/9/15	100%	Paulo Prado	L. Madariaga
445	<b>3.1.3</b>	<b>1.3.3.2.2</b>	<b>2015</b>	<b>16d</b>	<b>2/16/15</b>	<b>3/9/15</b>	<b>43%</b>	<b>Paulo Prado</b>	<b>L. Madariaga</b>

ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
446	3.1.3	1.3.3.2.2	Anti-bribery and corruption policy	16d	2/16/15	3/9/15	100%	Paulo Prado	L. Madariaga
447	3.1.3	1.3.3.2.2	Privacy Policy	16d	2/16/15	3/9/15	100%	Paulo Prado	L. Madariaga
448	3.1.3	1.3.3.2.2	Code of Conduct and Ethics Policy (approv Dec 2014)	16d	2/16/15	3/9/15	0%	Paulo Prado	L. Madariaga
449	3.1.3	1.3.3.2.2	BSI Code of Conduct in Securities Market - comparable to Insider Trading Policy	16d	2/16/15	3/9/15	0%	Paulo Prado	L. Madariaga
450	3.1.3	1.3.3.2.2	Model Risk Policy	16d	2/16/15	3/9/15	100%	Paulo Prado	L. Madariaga
451	3.1.3	1.3.3.2.2	Reputational Risk	16d	2/16/15	3/9/15	0%	Paulo Prado	L. Madariaga
452	3.1.3	1.3.3.2.2	Strategic Risk Policy	16d	2/16/15	3/9/15	0%	Paulo Prado	L. Madariaga
453	3.1.3	1.3.3.2.2	Santander Compliance Policy and Fair Lending Policy	1d	2/16/15	2/16/15	100%	Paulo Prado	L. Madariaga
454	<b>3.1.3</b>	<b>1.3.3.2.2</b>	<b>Post Enterprise Frameworks to shared drive</b>	<b>16d</b>	<b>2/16/15</b>	<b>3/9/15</b>	<b>100%</b>	<b>Paulo Prado</b>	<b>L. Madariaga</b>
455	3.1.3	1.3.3.2.2	BSI ERM Framework 2014	16d	2/16/15	3/9/15	100%	Paulo Prado	L. Madariaga
456	3.1.3	1.3.3.2.2	BSI Compliance Framework 2014	16d	2/16/15	3/9/15	100%	Paulo Prado	L. Madariaga
457	3.1.3	1.3.3.2.2	SAN-US Compliance Framework 2014	16d	2/16/15	3/9/15	100%	Paulo Prado	L. Madariaga
458	3.1.3	1.3.3.2.2	Ensure that SHUSA has access to BSI's documentation inventory	22d	11/2/15	12/1/15	0%	Paulo Prado	L. Madariaga
459	<i>3.1.3</i>	<i>1.3.3.2.2</i>	<i>Milestone: Policy Governance process implemented</i>	<i>0d</i>	<i>12/1/15</i>	<i>12/1/15</i>	<i>0%</i>	<i>Paulo Prado</i>	<i>L. Madariaga</i>
460	<b>3.1.3</b>	<b>1.3.3.2.3</b>	<b>Implement - SHUSA IHC ERM Policies</b>	<b>219d</b>	<b>3/2/15</b>	<b>1/1/16</b>	<b>0%</b>	<b>Paulo Prado</b>	<b>L. Madariaga</b>
461	<b>3.1.3</b>	<b>1.3.3.2.3</b>	<b>Obtain 2015 Enterprise Policies from SHUSA (Credit, Compliance, Operational, Market, Model, etc.)</b>	<b>44d</b>	<b>3/2/15</b>	<b>5/1/15</b>	<b>5%</b>	<b>Paulo Prado</b>	<b>L. Madariaga</b>
462	3.1.3	1.3.3.2.3	Risk owners responsible to provide 2015 policies for presentation to BOD	23d	3/2/15	4/1/15	10%	Paulo Prado	L. Madariaga
463	3.1.3	1.3.3.2.3	Present ERM policies to BSI's BOD for ratification	22d	4/1/15	4/30/15	0%	Paulo Prado	L. Madariaga
464	<i>3.1.3</i>	<i>1.3.3.2.3</i>	<i>Milestone: 2015 Enterprise Policies implemented</i>	<i>0d</i>	<i>5/1/15</i>	<i>5/1/15</i>	<i>0%</i>	<i>Paulo Prado</i>	<i>L. Madariaga</i>
465	<b>3.1.3</b>	<b>1.3.3.2.3</b>	<b>BSI to review policies provided by SHUSA as IHC (2016)</b>	<b>88d</b>	<b>9/1/15</b>	<b>1/1/16</b>	<b>0%</b>	<b>Paulo Prado</b>	<b>L. Madariaga</b>
466	<b>3.1.3</b>	<b>1.3.3.2.3</b>	<b>SAN US ERM to provide policies for SHUSA ERM area for review and feedback</b>	<b>44d</b>	<b>9/1/15</b>	<b>10/30/15</b>	<b>0%</b>	<b>Paulo Prado</b>	<b>L. Madariaga</b>
467	3.1.3	1.3.3.2.3	Risk ID and Assessment	44d	9/1/15	10/30/15	0%	Paulo Prado	L. Madariaga
468	3.1.3	1.3.3.2.3	Risk Tolerance Statement Framework	44d	9/1/15	10/30/15	0%	Paulo Prado	L. Madariaga
469	3.1.3	1.3.3.2.3	Risk Reporting Policy and Procedure	44d	9/1/15	10/30/15	0%	Paulo Prado	L. Madariaga
470	3.1.3	1.3.3.2.3	Strategic Risk	44d	9/1/15	10/30/15	0%	Paulo Prado	L. Madariaga



ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
471	3.1.3	1.3.3.2.3	Reputational Risk	44d	9/1/15	10/30/15	0%	Paulo Prado	L. Madariaga
472	3.1.3	1.3.3.2.3	Fiduciary Risk	44d	9/1/15	10/30/15	0%	Paulo Prado	L. Madariaga
473	<b>3.1.3</b>	<b>1.3.3.2.3</b>	<b>BSI to adopt SHUSA IHC ERM Policies by the Audit and Risk Committee of BSI</b>	<b>44d</b>	<b>11/2/15</b>	<b>12/31/15</b>	<b>0%</b>	<b>Paulo Prado</b>	<b>L. Madariaga</b>
474	3.1.3	1.3.3.2.3	Risk ID and Assessment	44d	11/2/15	12/31/15	0%	Paulo Prado	
475	3.1.3	1.3.3.2.3	Risk Tolerance Statement Framework	44d	11/2/15	12/31/15	0%	Paulo Prado	
476	3.1.3	1.3.3.2.3	Risk Reporting Policy and Procedure	44d	11/2/15	12/31/15	0%	Paulo Prado	
477	3.1.3	1.3.3.2.3	Strategic Risk	44d	11/2/15	12/31/15	0%	Paulo Prado	
478	3.1.3	1.3.3.2.3	Reputational Risk	44d	11/2/15	12/31/15	0%	Paulo Prado	
479	3.1.3	1.3.3.2.3	Fiduciary Risk	44d	11/2/15	12/31/15	0%	Paulo Prado	
480	<i>3.1.3</i>	<i>1.3.3.2.3</i>	<i>Milestone: 2016 Enterprise Policies implemented</i>	<i>0d</i>	<i>1/1/16</i>	<i>1/1/16</i>	<i>0%</i>	<i>Paulo Prado</i>	
481	<b>3.1.4</b>	<b>1.3.4</b>	<b>New York</b>	<b>195d</b>	<b>4/6/15</b>	<b>1/1/16</b>	<b>7%</b>	<b>Jim Bathon</b>	
482	<b>3.1.4</b>	<b>1.3.4.1</b>	<b>1.1.4.1 Governance: Adopt SHUSA Policy administration process</b>	<b>40d</b>	<b>5/4/15</b>	<b>6/26/15</b>	<b>50%</b>	<b>Jim Bathon</b>	
483	<b>3.1.4</b>	<b>1.3.4.1.1</b>	<b>1.1.4.1.1 Align NY Framework and Policy governance process with the SHUSA Framework and Policy governance process</b>	<b>40d</b>	<b>5/4/15</b>	<b>6/26/15</b>	<b>50%</b>	<b>Jim Bathon</b>	
484	3.1.4	1.3.4.1.1	1.1.4.1.1.1 Create a policy administrator for SIS	10d	5/4/15	5/15/15	100%	Jim Bathon	
485	3.1.4	1.3.4.1.1	1.1.4.1.1.2 Create a policy administrator for NY Branch	10d	5/18/15	5/29/15	100%	Jim Bathon	
486	3.1.4	1.3.4.1.1	1.1.4.1.1.3 Adopt SHUSA ERM policy management process	10d	6/1/15	6/12/15	0%	Jim Bathon	
487	3.1.4	1.3.4.1.1	1.1.4.1.1.4 Communicate Process to all Risk Management Area Policy owners	10d	6/15/15	6/26/15	0%	Jim Bathon	
488	<b>3.1.4</b>	<b>1.3.4.2</b>	<b>1.1.4.2 Enhance ERM Framework (2015)</b>	<b>85d</b>	<b>9/7/15</b>	<b>1/1/16</b>	<b>0%</b>	<b>Jim Bathon</b>	
489	<b>3.1.4</b>	<b>1.3.4.2.1</b>	<b>1.1.4.2.1 Align SIS ERM Framework with SHUSA ERM Framework</b>	<b>85d</b>	<b>9/7/15</b>	<b>1/1/16</b>	<b>0%</b>	<b>Jim Bathon</b>	
490	3.1.4	1.3.4.2.1	1.1.4.2.1.1 Review SHUSA ERM Framework to identify an inconsistencies with SIS business model	10d	4/6/15	4/17/15	0%	Jim Bathon	
491	3.1.4	1.3.4.2.1	1.1.4.2.1.2 Determine what changes should be made to the SHUSA ERM framework to incorporate nuances of SIS Business Model	10d	4/20/15	5/1/15	0%	Jim Bathon	
492	3.1.4	1.3.4.2.1	1.1.4.2.1.3 Review revised SHUSA ERM Framework with relevant stakeholders (departments? Committees?)	20d	5/4/15	5/29/15	0%	Jim Bathon	
493	3.1.4	1.3.4.2.1	1.1.4.2.1.4 Obtain approval of SHUSA ERM Framework at SIS	25d	6/1/15	7/3/15	0%	Jim Bathon	
494	<b>3.1.4</b>	<b>1.3.4.2.2</b>	<b>1.1.4.2.2 Align NY Branch ERM Framework with SHUSA ERM Framework</b>	<b>85d</b>	<b>9/7/15</b>	<b>1/1/16</b>	<b>0%</b>	<b>Jim Bathon</b>	
495	3.1.4	1.3.4.2.2	1.1.4.2.2.1 Review SHUSA ERM Framework to identify an inconsistencies with NY Branch ERM Framework (Santander S.A. Global ERM Framework)	10d	4/6/15	4/17/15	0%	Jim Bathon	

ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
496	3.1.4	1.3.4.2.2	1.1.4.2.2.2 Determine if any changes are needed in either the NY Branch ERM Framework or SHUSA ERM Framework	10d	4/20/15	5/1/15	0%	Jim Bathon	
497	3.1.4	1.3.4.2.2	1.1.4.2.2.3 Update identified framework (Global or SHUSA) as needed	20d	5/4/15	5/29/15	0%	Jim Bathon	
498	3.1.4	1.3.4.2.2	1.1.4.2.2.4 Obtain approval of NY Br ERM Framework	25d	6/1/15	7/3/15	0%	Jim Bathon	
499	3.1.4	1.3.4.2.3	1.1.4.2.3 Milestone: SIS and NY Br ERM Framework approved	0d	7/6/15	7/6/15	0%	Jim Bathon	
500	3.1.4	1.3.4.3	1.1.4.3 Align Risk Type Framework, Enterprise and Operating Policies	60d	4/6/15	6/29/15	0%	Jim Bathon	
501	3.1.4	1.3.4.3.1	1.1.4.3.1 Risk Mgmt Frameworks and ERM Policies: documents inventory, approvals and implementation	60d	4/6/15	6/26/15	0%	Jim Bathon	
502	3.1.4	1.3.4.3.1	1.1.4.3.1.1 Identify inventory of Risk Management Frameworks and Enterprise policies (Same 16 policies as 2014? Some areas are developing add'l enterprise policies)	20d	4/6/15	5/1/15	0%	Jim Bathon	
503	3.1.4	1.3.4.3.1	1.1.4.3.1.2 Ensure that ERM Policies have been developed in alignment to their corresponding frameworks and have been implemented.	20d	5/4/15	5/29/15	0%	Jim Bathon	
504	3.1.4	1.3.4.3.1	1.1.4.3.1.3 Document Inventory of Frameworks by type of Risk and ERM Policies	20d	6/1/15	6/26/15	0%	Jim Bathon	
505	3.1.4	1.3.4.3.2	1.1.4.3.2 Operating Policies: documents inventory, approvals and implementation	60d	4/6/15	6/26/15	0%	Jim Bathon	
506	3.1.4	1.3.4.3.2	1.1.4.3.1.1 Identify inventory of Operating policies	20d	4/6/15	5/1/15	0%	Jim Bathon	
507	3.1.4	1.3.4.3.2	1.1.4.3.1.2 Validate that Operating policies align to an Enterprise Policy	20d	5/4/15	5/29/15	0%	Jim Bathon	
508	3.1.4	1.3.4.3.2	1.1.4.3.1.3 Document Inventory of Operating Policies by type of Risk and ERM Policies	20d	6/1/15	6/26/15	0%	Jim Bathon	
509	3.1.4	1.3.4.3.3	1.1.4.3.3 Milestone: Inventory of RMFs, Enterprise Policies, and Operating policies completed	0d	6/29/15	6/29/15	0%	Jim Bathon	
510	3.1.4	1.3.5	ANTSUS	197d	3/31/15	12/31/15	0%	David Petric	
511	3.1.4	1.3.5.1	Perform gap assessment on the Abbey UK (Parent) Enterprise Risk Management Framework versus the SHUSA Risk Management Framework	24d	3/31/15	5/1/15	0%	David Petric	
512	3.1.4	1.3.5.2	If there are differences between the two frameworks, determine which framework should be updated	10d	5/4/15	5/15/15	0%	David Petric	
513	3.1.4	1.3.5.3	Update Framework	25d	5/18/15	6/19/15	0%	David Petric	
514	3.1.4	1.3.5.4	Milestone: ANTSUS 2016 ERM Framework Approved and Implemented	0d	12/31/15	12/31/15	0%	David Petric	
515	3.1.5	1.3.6	BSTI / Totta	197d?	3/31/15	12/31/15	0%	Sandy	
516	3.1.5	1.3.6.1	Perform gap assessment on the Totta (Parent) Enterprise Risk Management Framework versus the SHUSA Risk Management Framework	24d?	3/31/15	5/1/15	0%	Sandy	
517	3.1.5	1.3.6.2	If there are differences between the two frameworks, determine which framework should be updated	10d?	5/4/15	5/15/15	0%	Sandy	
518	3.1.5	1.3.6.3	Update Framework	25d?	5/18/15	6/19/15	0%	Sandy	
519	3.1.5	1.3.6.4	Milestone: BSTI and Totta 2016 ERM Framework Approved and Implemented	0d	12/31/15	12/31/15	0%	Sandy	
520	3.1.5	1.3.7	SAM Puerto Rico	198d?	3/31/15	12/31/15	0%	Daniela	
521	3.1.5	1.3.7.1	Perform gap assessment on the SAM PR Enterprise Risk Management Framework versus the SHUSA Risk Management Framework	24d	3/31/15	5/1/15	0%	Daniela	Daniela Garcia Conde

ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
522	3.1.5	1.3.7.2	If there are differences between the two frameworks, determine which framework should be updated	10d?	5/4/15	5/15/15	0%	Daniela	Daniela Garcia Conde
523	3.1.5	1.3.7.3	Update Framework	25d?	5/18/15	6/19/15	0%	Daniela	Daniela Garcia Conde
524	3.1.5	1.3.7.4	Milestone:SAM 2016 ERM Framework Approved and Implemented	1d	12/31/15	12/31/15	0%	Daniela	
525		1.4	RISK ID	740d?	3/3/14	12/30/16	78%	Diane Allaire	
526	3.1.1	1.4.1	SHUSA	740d	3/3/14	12/30/16	85%	Diane Allaire	
527	3.1.1	1.4.1.1	Foundational Risk Management	304d	3/3/14	4/30/15	99%	Diane Allaire	Gabriel Belete
528	3.1.1	1.4.1.1.1	Capabilities	132d	3/3/14	9/2/14	100%	Diane Allaire	Gabriel Belete
529	3.1.1	1.4.1.1.1	Building the initial Risk Inventory and Materiality Assessment	132d	3/3/14	9/2/14	100%	Diane Allaire	Gabriel Belete
530	3.1.1	1.4.1.1.1	Methodology	21d	3/3/14	3/31/14	100%	R. Alhadeff	R. Alhadeff
531	3.1.1	1.4.1.1.1	Weekly Webinars (Fridays)	31d	5/16/14	6/27/14	100%	R. Alhadeff	R. Alhadeff
532	3.1.1	1.4.1.1.1	Execution	98d	4/18/14	9/2/14	100%	R. Alhadeff	R. Alhadeff
533	3.1.1	1.4.1.1.1	Mortgages	10d	4/18/14	5/1/14	100%	R. Alhadeff	R. Alhadeff
534	3.1.1	1.4.1.1.1	Global Banking and Markets	10d	4/25/14	5/8/14	100%	R. Alhadeff	R. Alhadeff
535	3.1.1	1.4.1.1.1	Financial Management	82d	5/12/14	9/2/14	100%	R. Alhadeff	R. Alhadeff
536	3.1.1	1.4.1.1.1	Indirect Vehicle Finance (SCUSA)	10d	6/1/14	6/12/14	100%	R. Alhadeff	R. Alhadeff
537	3.1.1	1.4.1.1.1	Unsecured Lending (SCUSA)	10d	6/1/14	6/12/14	100%	R. Alhadeff	R. Alhadeff
538	3.1.1	1.4.1.1.1	Multifamily	22d	7/21/14	8/19/14	100%	R. Alhadeff	R. Alhadeff
539	3.1.1	1.4.1.1.1	Individuals	23d	6/1/14	7/1/14	100%	R. Alhadeff	R. Alhadeff
540	3.1.1	1.4.1.1.1	Credit Cards	23d	6/1/14	7/1/14	100%	R. Alhadeff	R. Alhadeff
541	3.1.1	1.4.1.1.1	Middle Market	22d	7/21/14	8/19/14	100%	R. Alhadeff	R. Alhadeff
542	3.1.1	1.4.1.1.1	Small Business Banking	23d	6/1/14	7/1/14	100%	R. Alhadeff	R. Alhadeff
543	3.1.1	1.4.1.1.1	RV & Marine	23d	6/1/14	7/1/14	100%	R. Alhadeff	R. Alhadeff
544	3.1.1	1.4.1.1.1	Business Banking	22d	7/21/14	8/19/14	100%	R. Alhadeff	R. Alhadeff
545	3.1.1	1.4.1.1.1	Commercial Real Estate	22d	7/21/14	8/19/14	100%	R. Alhadeff	R. Alhadeff
546	3.1.1	1.4.1.1.1	Asset Based Lending	32d	7/21/14	9/2/14	100%	R. Alhadeff	R. Alhadeff

ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
547	3.1.1	1.4.1.1.1	Oil & Gas	32d	7/21/14	9/2/14	100%	R. Alhadeff	R. Alhadeff
548	3.1.1	1.4.1.1.1	Government Banking	32d	7/21/14	9/2/14	100%	R. Alhadeff	R. Alhadeff
549	3.1.1	1.4.1.1.1	Mortgage Warehouse	22d	7/21/14	8/19/14	100%	R. Alhadeff	R. Alhadeff
550	3.1.1	1.4.1.1.1	International Desk / Trade Finance / Others	32d	7/21/14	9/2/14	100%	R. Alhadeff	R. Alhadeff
551	3.1.1	1.4.1.1.1	CEVF	32d	7/21/14	9/2/14	100%	R. Alhadeff	R. Alhadeff
552	3.1.1	1.4.1.1.1	Dealer Floor Plan	32d	7/21/14	9/2/14	100%	R. Alhadeff	R. Alhadeff
553	3.1.1	1.4.1.1.1	Wealth Management	32d	7/21/14	9/2/14	100%	R. Alhadeff	R. Alhadeff
554	3.1.1	1.4.1.1.1	Corporate Center	32d	7/21/14	9/2/14	100%	R. Alhadeff	R. Alhadeff
555	3.1.1	1.4.1.1.1	Leasing	32d	7/21/14	9/2/14	100%	R. Alhadeff	R. Alhadeff
556	<b>3.1.1</b>	<b>1.4.1.1.2</b>	<b>Policy</b>	<b>145d</b>	<b>10/10/14</b>	<b>4/30/15</b>	<b>99%</b>	<b>Diane Allaire</b>	
557	3.1.1	1.4.1.1.2	SHUSA - Develop and disseminate policy for a continuous Risk ID and Assessment process to SBNA and SCUSA for initial feedback	22d	10/10/14	11/10/14	100%	Diane Allaire	D. Allaire,D. Duffee
558	3.1.1	1.4.1.1.2	SHUSA- Incorporate feedback from SCUSA and SBNA into the SHUSA Policy	9d	11/24/14	12/4/14	100%	Diane Allaire	D. Allaire,D. Duffee
559	3.1.1	1.4.1.1.2	SHUSA- Disseminate draft policy to SAN-US Risk Managers for feedback	5d	11/28/14	12/4/14	100%	Diane Allaire	D. Allaire,D. Duffee
560	<i>3.1.1</i>	<i>1.4.1.1.2</i>	<i>Milestone: SHUSA- First Draft of Enterprise Risk ID and Assessment Policy Complete</i>	<i>1d</i>	<i>12/31/14</i>	<i>12/31/14</i>	<i>100%</i>	<i>Diane Allaire</i>	<i>D. Allaire,D. Duffee</i>
561	3.1.1	1.4.1.1.2	SHUSA - Develop a plan for 2015 Risk ID and Assessment methodology	77d	1/1/15	4/17/15	100%	Diane Allaire	
562	<i>3.1.1</i>	<i>1.4.1.1.2</i>	<i>Milestone: Approval - Risk ID and Assessment Policy (Board)</i>	<i>1d</i>	<i>4/30/15</i>	<i>4/30/15</i>	<i>0%</i>	<i>Diane Allaire</i>	<i>D. Allaire,M. Carbone</i>
563	<b>3.1.1</b>	<b>1.4.1.1.3</b>	<b>Risk Identification resources</b>	<b>0d</b>	<b>3/30/15</b>	<b>3/30/15</b>	<b>100%</b>	<b>Diane Allaire</b>	
564	<i>3.1.1</i>	<i>1.4.1.1.3</i>	<i>Milestone: Completion of Risk ID team structure for SHUSA</i>	<i>0d</i>	<i>3/30/15</i>	<i>3/30/15</i>	<i>100%</i>	<i>Diane Allaire</i>	<i>D. Begara,M. Carbone</i>
565	<b>3.1.1</b>	<b>1.4.1.1.4</b>	<b>Risk Taxonomy</b>	<b>80d</b>	<b>11/24/14</b>	<b>3/13/15</b>	<b>100%</b>	<b>Diane Allaire</b>	
566	3.1.1	1.4.1.1.4	SHUSA - Draft a Risk taxonomy disseminate to SCUSA and SBNA for feedback	5d	11/24/14	11/28/14	100%	Diane Allaire	D. Allaire/ D. Degara/ R. Ballou
567	3.1.1	1.4.1.1.4	SHUSA - obtain concurrence from SBNA and SCUSA on Risk Taxonomy	23d	12/1/14	12/31/14	100%	Diane Allaire	D. Degara
568	3.1.1	1.4.1.1.4	SHUSA - Complete plan for 2015 Risk ID and Assessment process	20d	2/16/15	3/13/15	100%		

ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
569	<b>3.1.1</b>	<b>1.4.1.2</b>	<b>2015 Risk ID and Assessment Process</b>	<b>119d</b>	<b>1/15/15</b>	<b>6/30/15</b>	<b>80%</b>	<b>Diane Allaire</b>	
570	<b>3.1.1</b>	<b>1.4.1.2.1</b>	<b>SHUSA - Complete plan to enhance 2015 Risk ID and Assessment methodology</b>	<b>119d</b>	<b>1/15/15</b>	<b>6/30/15</b>	<b>80%</b>	<b>Diane Allaire</b>	
571	3.1.1	1.4.1.2.1	Identify deficiencies in current program	12d	1/15/15	1/30/15	100%	Diane Allaire	
572	3.1.1	1.4.1.2.1	Set priorities for critical deficiencies	22d	1/15/15	2/13/15	100%	Diane Allaire	
573	3.1.1	1.4.1.2.1	Develop proposal to enhance current program and remediate regulatory findings	20d	2/2/15	2/27/15	100%	Diane Allaire	
574	3.1.1	1.4.1.2.1	Conduct working sessions to determine future state of program	30d	2/16/15	3/27/15	100%	Diane Allaire	
575	3.1.1	1.4.1.2.1	Write high-level Methodology/Guidance Documents for Risk ID process	45d	2/16/15	4/17/15	95%	Diane Allaire	
576	3.1.1	1.4.1.2.1	Obtain approval for the Guidance Documents	97d	2/16/15	6/30/15	55%	Diane Allaire	
577	<b>3.1.1</b>	<b>1.4.1.3</b>	<b>2016 RISK ID and Assessment Process</b>	<b>131d</b>	<b>7/1/16</b>	<b>12/30/16</b>	<b>0%</b>	<b>Diane Allaire</b>	
578	3.1.1	1.4.1.3.1	SHUSA - Complete enhanced 2016 Risk ID and Assessment methodology	131d	7/1/16	12/30/16	0%	Diane Allaire	
579	<b>3.1.5</b>	<b>1.4.2</b>	<b>Puerto Rico (BSBC, BSPR, SIA, SS, SFS, SOB)</b>	<b>543d</b>	<b>8/1/14</b>	<b>8/31/16</b>	<b>83%</b>	<b>Juan Pablo Jurado</b>	
580	3.1.5	1.4.2.1	Perform Process GAP analysis against Risk Framework & Governance Structure (v. 2)	12d	4/15/15	4/30/15	0%	Juan Pablo Jurado	
581	3.1.5	1.4.2.2	Develop plans to close any Process Gaps (v. 2)	12d	4/30/15	5/15/15	0%	Juan Pablo Jurado	
582	3.1.5	1.4.2.3	Define processes for each Gap Area(v. 2)	23d	4/30/15	6/1/15	0%	Juan Pablo Jurado	
583	3.1.5	1.4.2.4	Review Current Risk Assessment Summary for Becoming a Risk ID & Risk Assessment	86d	8/1/14	11/28/14	100%	Juan Pablo Jurado	
584	<b>3.1.5</b>	<b>1.4.2.5</b>	<b>Risk ID &amp; Risk Assessment - GBM</b>	<b>232d</b>	<b>8/11/14</b>	<b>7/1/15</b>	<b>87%</b>	<b>Juan Pablo Jurado</b>	
585	3.1.5	1.4.2.5.1	Description of the line of business and its objectives	10d	8/11/14	8/22/14	100%	Juan Pablo Jurado	
586	3.1.5	1.4.2.5.2	Identification and inventory of events and risks	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
587	3.1.5	1.4.2.5.3	Determination of prioritized risks for the line of business	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
588	3.1.5	1.4.2.5.4	Assessment of the quality of the controls in place and Quality of Risk Management to mitigate for a subset of the prioritized risks	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
589	3.1.5	1.4.2.5.5	Deduction of Residual Risk Rating by combining the Inherent Risk ratings and Control Effectiveness Ratings for each risk event	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
590	3.1.5	1.4.2.5.6	Development of action plans based on risk assessment results	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
591	3.1.5	1.4.2.5.7	Aggregation of risk for the line of business by assessing the Inherent Risk, Control Effectiveness and Residual Risk for the line of business	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
592	3.1.5	1.4.2.5.8	Review, validation and challenge by PMO, Internal Control, Second Line of Defense and responsible of transversal risks	139d	10/20/14	4/30/15	83%	Juan Pablo Jurado	

ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
593	3.1.5	1.4.2.5.9	Development of Final Report	31d	5/1/15	6/12/15	0%	Juan Pablo Jurado	
594	3.1.5	1.4.2.5.1	Presentation of results of Risk ID & Risk Assessment in the Line of Business Forum/Committee	12d	6/15/15	6/30/15	0%	Juan Pablo Jurado	
595	3.1.5	1.4.2.5.1	Milestone: Risk ID & Risk Assessment for GBM complete	0d	7/1/15	7/1/15	0%	Juan Pablo Jurado	
596	3.1.5	1.4.2.6	Risk ID & Risk Assessment - Enterprise	232d	8/11/14	7/1/15	85%	Juan Pablo Jurado	
597	3.1.5	1.4.2.6.1	Description of the line of business and its objectives	10d	8/11/14	8/22/14	100%	Juan Pablo Jurado	
598	3.1.5	1.4.2.6.2	Identification and inventory of events and risks	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
599	3.1.5	1.4.2.6.3	Determination of prioritized risks for the line of business	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
600	3.1.5	1.4.2.6.4	Assessment of the quality of the controls in place and Quality of Risk Management to mitigate for a subset of the prioritized risks	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
601	3.1.5	1.4.2.6.5	Deduction of Residual Risk Rating by combining the Inherent Risk ratings and Control Effectiveness Ratings for each risk event	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
602	3.1.5	1.4.2.6.6	Development of action plans based on risk assessment results	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
603	3.1.5	1.4.2.6.7	Aggregation of risk for the line of business by assessing the Inherent Risk, Control Effectiveness and Residual Risk for the line of business	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
604	3.1.5	1.4.2.6.8	Review, validation and challenge by PMO, Internal Control, Second Line of Defense and responsible of transversal risks	86d	1/1/15	4/30/15	72%	Juan Pablo Jurado	
605	3.1.5	1.4.2.6.9	Development of Final Report	31d	5/1/15	6/12/15	0%	Juan Pablo Jurado	
606	3.1.5	1.4.2.6.1	Presentation of results of Risk ID & Risk Assessment in the Line of Business Forum/Committee	12d	6/15/15	6/30/15	0%	Juan Pablo Jurado	
607	3.1.5	1.4.2.6.1	Milestone: Risk ID & Risk Assessment for Enterprise complete	0d	7/1/15	7/1/15	0%	Juan Pablo Jurado	
608	3.1.5	1.4.2.7	Risk ID & Risk Assessment - Institutional / Public Sector	232d	8/11/14	7/1/15	87%	Juan Pablo Jurado	
609	3.1.5	1.4.2.7.1	Description of the line of business and its objectives	10d	8/11/14	8/22/14	100%	Juan Pablo Jurado	
610	3.1.5	1.4.2.7.2	Identification and inventory of events and risks	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
611	3.1.5	1.4.2.7.3	Determination of prioritized risks for the line of business	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
612	3.1.5	1.4.2.7.4	Assessment of the quality of the controls in place and Quality of Risk Management to mitigate for a subset of the prioritized risks	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
613	3.1.5	1.4.2.7.5	Deduction of Residual Risk Rating by combining the Inherent Risk ratings and Control Effectiveness Ratings for each risk event	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
614	3.1.5	1.4.2.7.6	Development of action plans based on risk assessment results	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	



ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
615	3.1.5	1.4.2.7.7	Aggregation of risk for the line of business by assessing the Inherent Risk, Control Effectiveness and Residual Risk for the line of business	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
616	3.1.5	1.4.2.7.8	Review, validation and challenge by PMO, Internal Control, Second Line of Defense and responsible of transversal risks	139d	10/20/14	4/30/15	83%	Juan Pablo Jurado	
617	3.1.5	1.4.2.7.9	Development of Final Report	31d	5/1/15	6/12/15	0%	Juan Pablo Jurado	
618	3.1.5	1.4.2.7.1	Presentation of results of Risk ID & Risk Assessment in the Line of Business Forum/Committee	12d	6/15/15	6/30/15	0%	Juan Pablo Jurado	
619	3.1.5	1.4.2.7.1	Milestone: Risk ID & Risk Assessment for Institutional / Public Sector complete	0d	7/1/15	7/1/15	0%	Juan Pablo Jurado	
620	3.1.5	1.4.2.8	Risk ID & Risk Assessment - Personal Loans	232d	8/11/14	7/1/15	87%	Juan Pablo Jurado	
621	3.1.5	1.4.2.8.1	Description of the line of business and its objectives	10d	8/11/14	8/22/14	100%	Juan Pablo Jurado	
622	3.1.5	1.4.2.8.2	Identification and inventory of events and risks	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
623	3.1.5	1.4.2.8.3	Determination of prioritized risks for the line of business	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
624	3.1.5	1.4.2.8.4	Assessment of the quality of the controls in place and Quality of Risk Management to mitigate for a subset of the prioritized risks	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
625	3.1.5	1.4.2.8.5	Deduction of Residual Risk Rating by combining the Inherent Risk ratings and Control Effectiveness Ratings for each risk event	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
626	3.1.5	1.4.2.8.6	Development of action plans based on risk assessment results	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
627	3.1.5	1.4.2.8.7	Aggregation of risk for the line of business by assessing the Inherent Risk, Control Effectiveness and Residual Risk for the line of business	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
628	3.1.5	1.4.2.8.8	Review, validation and challenge by PMO, Internal Control, Second Line of Defense and responsible of transversal risks	139d	10/20/14	4/30/15	83%	Juan Pablo Jurado	
629	3.1.5	1.4.2.8.9	Development of Final Report	31d	5/1/15	6/12/15	0%	Juan Pablo Jurado	
630	3.1.5	1.4.2.8.1	Presentation of results of Risk ID & Risk Assessment in the Line of Business Forum/Committee	12d	6/15/15	6/30/15	0%	Juan Pablo Jurado	
631	3.1.5	1.4.2.8.1	Milestone: Risk ID & Risk Assessment for Personal Loans complete	0d	7/1/15	7/1/15	0%	Juan Pablo Jurado	
632	3.1.5	1.4.2.9	Risk ID & Risk Assessment - Small Business Banking	232d	8/11/14	7/1/15	87%	Juan Pablo Jurado	
633	3.1.5	1.4.2.9.1	Description of the line of business and its objectives	10d	8/11/14	8/22/14	100%	Juan Pablo Jurado	
634	3.1.5	1.4.2.9.2	Identification and inventory of events and risks	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
635	3.1.5	1.4.2.9.3	Determination of prioritized risks for the line of business	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
636	3.1.5	1.4.2.9.4	Assessment of the quality of the controls in place and Quality of Risk Management to mitigate for a subset of the prioritized risks	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	

ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
637	3.1.5	1.4.2.9.5	Deduction of Residual Risk Rating by combining the Inherent Risk ratings and Control Effectiveness Ratings for each risk event	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
638	3.1.5	1.4.2.9.6	Development of action plans based on risk assessment results	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
639	3.1.5	1.4.2.9.7	Aggregation of risk for the line of business by assessing the Inherent Risk, Control Effectiveness and Residual Risk for the line of business	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
640	3.1.5	1.4.2.9.8	Review, validation and challenge by PMO, Internal Control, Second Line of Defense and responsible of transversal risks	139d	10/20/14	4/30/15	83%	Juan Pablo Jurado	
641	3.1.5	1.4.2.9.9	Development of Final Report	31d	5/1/15	6/12/15	0%	Juan Pablo Jurado	
642	3.1.5	1.4.2.9.1	Presentation of results of Risk ID & Risk Assessment in the Line of Business Forum/Committee	12d	6/15/15	6/30/15	0%	Juan Pablo Jurado	
643	3.1.5	1.4.2.9.1	Milestone: Risk ID & Risk Assessment for Small Business complete	0d	7/1/15	7/1/15	0%	Juan Pablo Jurado	
644	3.1.5	1.4.2.10	Risk ID & Risk Assessment - Insurance	232d	8/11/14	7/1/15	87%	Juan Pablo Jurado	
645	3.1.5	1.4.2.10.	Description of the line of business and its objectives	10d	8/11/14	8/22/14	100%	Juan Pablo Jurado	
646	3.1.5	1.4.2.10.	Identification and inventory of events and risks	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
647	3.1.5	1.4.2.10.	Determination of prioritized risks for the line of business	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
648	3.1.5	1.4.2.10.	Assessment of the quality of the controls in place and Quality of Risk Management to mitigate for a subset of the prioritized risks	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
649	3.1.5	1.4.2.10.	Deduction of Residual Risk Rating by combining the Inherent Risk ratings and Control Effectiveness Ratings for each risk event	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
650	3.1.5	1.4.2.10.	Development of action plans based on risk assessment results	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
651	3.1.5	1.4.2.10.	Aggregation of risk for the line of business by assessing the Inherent Risk, Control Effectiveness and Residual Risk for the line of business	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
652	3.1.5	1.4.2.10.	Review, validation and challenge by PMO, Internal Control, Second Line of Defense and responsible of transversal risks	139d	10/20/14	4/30/15	83%	Juan Pablo Jurado	
653	3.1.5	1.4.2.10.	Development of Final Report	31d	5/1/15	6/12/15	0%	Juan Pablo Jurado	
654	3.1.5	1.4.2.10.	Presentation of results of Risk ID & Risk Assessment in the Line of Business Forum/Committee	12d	6/15/15	6/30/15	0%	Juan Pablo Jurado	
655	3.1.5	1.4.2.10.	Milestone: Risk ID & Risk Assessment for Insurance complete	0d	7/1/15	7/1/15	0%	Juan Pablo Jurado	
656	3.1.5	1.4.2.11	Risk ID & Risk Assessment - Credit Cards	232d	8/11/14	7/1/15	87%	Juan Pablo Jurado	
657	3.1.5	1.4.2.11.	Description of the line of business and its objectives	10d	8/11/14	8/22/14	100%	Juan Pablo Jurado	
658	3.1.5	1.4.2.11.	Identification and inventory of events and risks	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	

ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
659	3.1.5	1.4.2.11.	Determination of prioritized risks for the line of business	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
660	3.1.5	1.4.2.11.	Assessment of the quality of the controls in place and Quality of Risk Management to mitigate for a subset of the prioritized risks	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
661	3.1.5	1.4.2.11.	Deduction of Residual Risk Rating by combining the Inherent Risk ratings and Control Effectiveness Ratings for each risk event	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
662	3.1.5	1.4.2.11.	Development of action plans based on risk assessment results	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
663	3.1.5	1.4.2.11.	Aggregation of risk for the line of business by assessing the Inherent Risk, Control Effectiveness and Residual Risk for the line of business	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
664	3.1.5	1.4.2.11.	Review, validation and challenge by PMO, Internal Control, Second Line of Defense and responsible of transversal risks	139d	10/20/14	4/30/15	83%	Juan Pablo Jurado	
665	3.1.5	1.4.2.11.	Development of Final Report	31d	5/1/15	6/12/15	0%	Juan Pablo Jurado	
666	3.1.5	1.4.2.11.	Presentation of results of Risk ID & Risk Assessment in the Line of Business Forum/Committee	12d	6/15/15	6/30/15	0%	Juan Pablo Jurado	
667	3.1.5	1.4.2.11.	Milestone: Risk ID & Risk Assessment for Credit Cards complete	0d	7/1/15	7/1/15	0%	Juan Pablo Jurado	
668	3.1.5	1.4.2.12	Risk ID & Risk Assessment - Mortgages	232d	8/11/14	7/1/15	87%	Juan Pablo Jurado	
669	3.1.5	1.4.2.12.	Description of the line of business and its objectives	10d	8/11/14	8/22/14	100%	Juan Pablo Jurado	
670	3.1.5	1.4.2.12.	Identification and inventory of events and risks	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
671	3.1.5	1.4.2.12.	Determination of prioritized risks for the line of business	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
672	3.1.5	1.4.2.12.	Assessment of the quality of the controls in place and Quality of Risk Management to mitigate for a subset of the prioritized risks	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
673	3.1.5	1.4.2.12.	Deduction of Residual Risk Rating by combining the Inherent Risk ratings and Control Effectiveness Ratings for each risk event	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
674	3.1.5	1.4.2.12.	Development of action plans based on risk assessment results	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
675	3.1.5	1.4.2.12.	Aggregation of risk for the line of business by assessing the Inherent Risk, Control Effectiveness and Residual Risk for the line of business	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
676	3.1.5	1.4.2.12.	Review, validation and challenge by PMO, Internal Control, Second Line of Defense and responsible of transversal risks	139d	10/20/14	4/30/15	83%	Juan Pablo Jurado	
677	3.1.5	1.4.2.12.	Development of Final Report	31d	5/1/15	6/12/15	0%	Juan Pablo Jurado	
678	3.1.5	1.4.2.12.	Presentation of results of Risk ID & Risk Assessment in the Line of Business Forum/Committee	12d	6/15/15	6/30/15	0%	Juan Pablo Jurado	
679	3.1.5	1.4.2.12.	Milestone: Risk ID & Risk Assessment for Mortgages complete	0d	7/1/15	7/1/15	0%	Juan Pablo Jurado	
680	3.1.5	1.4.2.13	Risk ID & Risk Assessment - Mortgage Servicing	232d	8/11/14	7/1/15	87%	Juan Pablo Jurado	

ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
681	3.1.5	1.4.2.13.	Description of the line of business and its objectives	10d	8/11/14	8/22/14	100%	Juan Pablo Jurado	
682	3.1.5	1.4.2.13.	Identification and inventory of events and risks	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
683	3.1.5	1.4.2.13.	Determination of prioritized risks for the line of business	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
684	3.1.5	1.4.2.13.	Assessment of the quality of the controls in place and Quality of Risk Management to mitigate for a subset of the prioritized risks	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
685	3.1.5	1.4.2.13.	Deduction of Residual Risk Rating by combining the Inherent Risk ratings and Control Effectiveness Ratings for each risk event	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
686	3.1.5	1.4.2.13.	Development of action plans based on risk assessment results	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
687	3.1.5	1.4.2.13.	Aggregation of risk for the line of business by assessing the Inherent Risk, Control Effectiveness and Residual Risk for the line of business	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
688	3.1.5	1.4.2.13.	Review, validation and challenge by PMO, Internal Control, Second Line of Defense and responsible of transversal risks	139d	10/20/14	4/30/15	83%	Juan Pablo Jurado	
689	3.1.5	1.4.2.13.	Development of Final Report	31d	5/1/15	6/12/15	0%	Juan Pablo Jurado	
690	3.1.5	1.4.2.13.	Presentation of results of Risk ID & Risk Assessment in the Line of Business Forum/Committee	12d	6/15/15	6/30/15	0%	Juan Pablo Jurado	
691	3.1.5	1.4.2.13.	Milestone: Risk ID & Risk Assessment for Mortgage Servicing complete	0d	7/1/15	7/1/15	0%	Juan Pablo Jurado	
692	3.1.5	1.4.2.14	Risk ID & Risk Assessment - Santander Securities	232d	8/11/14	7/1/15	87%	Juan Pablo Jurado	
693	3.1.5	1.4.2.14.	Description of the line of business and its objectives	10d	8/11/14	8/22/14	100%	Juan Pablo Jurado	
694	3.1.5	1.4.2.14.	Identification and inventory of events and risks	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
695	3.1.5	1.4.2.14.	Determination of prioritized risks for the line of business	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
696	3.1.5	1.4.2.14.	Assessment of the quality of the controls in place and Quality of Risk Management to mitigate for a subset of the prioritized risks	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
697	3.1.5	1.4.2.14.	Deduction of Residual Risk Rating by combining the Inherent Risk ratings and Control Effectiveness Ratings for each risk event	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
698	3.1.5	1.4.2.14.	Development of action plans based on risk assessment results	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
699	3.1.5	1.4.2.14.	Aggregation of risk for the line of business by assessing the Inherent Risk, Control Effectiveness and Residual Risk for the line of business	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
700	3.1.5	1.4.2.14.	Review, validation and challenge by PMO, Internal Control, Second Line of Defense and responsible of transversal risks	139d	10/20/14	4/30/15	83%	Juan Pablo Jurado	
701	3.1.5	1.4.2.14.	Development of Final Report	31d	5/1/15	6/12/15	0%	Juan Pablo Jurado	
702	3.1.5	1.4.2.14.	Presentation of results of Risk ID & Risk Assessment in the Line of Business Forum/Committee	12d	6/15/15	6/30/15	0%	Juan Pablo Jurado	

ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
703	3.1.5	1.4.2.14.	Milestone: Risk ID & Risk Assessment for Santander Securities complete	0d	7/1/15	7/1/15	0%	Juan Pablo Jurado	
704	3.1.5	1.4.2.15	Risk ID & Risk Assessment - Financial Management	232d	8/11/14	7/1/15	87%	Juan Pablo Jurado	
705	3.1.5	1.4.2.15.	Description of the line of business and its objectives	10d	8/11/14	8/22/14	100%	Juan Pablo Jurado	
706	3.1.5	1.4.2.15.	Identification and inventory of events and risks	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
707	3.1.5	1.4.2.15.	Determination of prioritized risks for the line of business	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
708	3.1.5	1.4.2.15.	Assessment of the quality of the controls in place and Quality of Risk Management to mitigate for a subset of the prioritized risks	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
709	3.1.5	1.4.2.15.	Deduction of Residual Risk Rating by combining the Inherent Risk ratings and Control Effectiveness Ratings for each risk event	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
710	3.1.5	1.4.2.15.	Development of action plans based on risk assessment results	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
711	3.1.5	1.4.2.15.	Aggregation of risk for the line of business by assessing the Inherent Risk, Control Effectiveness and Residual Risk for the line of business	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
712	3.1.5	1.4.2.15.	Review, validation and challenge by PMO, Internal Control, Second Line of Defense and responsible of transversal risks	139d	10/20/14	4/30/15	83%	Juan Pablo Jurado	
713	3.1.5	1.4.2.15.	Development of Final Report	31d	5/1/15	6/12/15	0%	Juan Pablo Jurado	
714	3.1.5	1.4.2.15.	Presentation of results of Risk ID & Risk Assessment in the Line of Business Forum/Committee	12d	6/15/15	6/30/15	0%	Juan Pablo Jurado	
715	3.1.5	1.4.2.15.	Milestone: Risk ID & Risk Assessment for Financial Management complete	0d	7/1/15	7/1/15	0%	Juan Pablo Jurado	
716	3.1.5	1.4.2.16	Risk ID & Risk Assessment - Trust	232d	8/11/14	7/1/15	87%	Juan Pablo Jurado	
717	3.1.5	1.4.2.16.	Description of the line of business and its objectives	10d	8/11/14	8/22/14	100%	Juan Pablo Jurado	
718	3.1.5	1.4.2.16.	Identification and inventory of events and risks	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
719	3.1.5	1.4.2.16.	Determination of prioritized risks for the line of business	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
720	3.1.5	1.4.2.16.	Assessment of the quality of the controls in place and Quality of Risk Management to mitigate for a subset of the prioritized risks	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
721	3.1.5	1.4.2.16.	Deduction of Residual Risk Rating by combining the Inherent Risk ratings and Control Effectiveness Ratings for each risk event	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
722	3.1.5	1.4.2.16.	Development of action plans based on risk assessment results	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
723	3.1.5	1.4.2.16.	Aggregation of risk for the line of business by assessing the Inherent Risk, Control Effectiveness and Residual Risk for the line of business	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
724	3.1.5	1.4.2.16.	Review, validation and challenge by PMO, Internal Control, Second Line of Defense and responsible of transversal risks	139d	10/20/14	4/30/15	83%	Juan Pablo Jurado	

ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
725	3.1.5	1.4.2.16.	Development of Final Report	31d	5/1/15	6/12/15	0%	Juan Pablo Jurado	
726	3.1.5	1.4.2.16.	Presentation of results of Risk ID & Risk Assessment in the Line of Business Forum/Committee	12d	6/15/15	6/30/15	0%	Juan Pablo Jurado	
727	3.1.5	1.4.2.16.	Milestone: Risk ID & Risk Assessment for Trust complete	0d	7/1/15	7/1/15	0%	Juan Pablo Jurado	
728	3.1.5	1.4.2.17	Risk ID & Risk Assessment - Corporate Center (Including REO)	232d	8/11/14	7/1/15	87%	Juan Pablo Jurado	
729	3.1.5	1.4.2.17.	Description of the line of business and its objectives	10d	8/11/14	8/22/14	100%	Juan Pablo Jurado	
730	3.1.5	1.4.2.17.	Identification and inventory of events and risks	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
731	3.1.5	1.4.2.17.	Determination of prioritized risks for the line of business	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
732	3.1.5	1.4.2.17.	Assessment of the quality of the controls in place and Quality of Risk Management to mitigate for a subset of the prioritized risks	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
733	3.1.5	1.4.2.17.	Deduction of Residual Risk Rating by combining the Inherent Risk ratings and Control Effectiveness Ratings for each risk event	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
734	3.1.5	1.4.2.17.	Development of action plans based on risk assessment results	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
735	3.1.5	1.4.2.17.	Aggregation of risk for the line of business by assessing the Inherent Risk, Control Effectiveness and Residual Risk for the line of business	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
736	3.1.5	1.4.2.17.	Review, validation and challenge by PMO, Internal Control, Second Line of Defense and responsible of transversal risks	139d	10/20/14	4/30/15	83%	Juan Pablo Jurado	
737	3.1.5	1.4.2.17.	Development of Final Report	31d	5/1/15	6/12/15	0%	Juan Pablo Jurado	
738	3.1.5	1.4.2.17.	Presentation of results of Risk ID & Risk Assessment in the Line of Business Forum/Committee	12d	6/15/15	6/30/15	0%	Juan Pablo Jurado	
739	3.1.5	1.4.2.17.	Milestone: Risk ID & Risk Assessment for Corporate Center complete	0d	7/1/15	7/1/15	0%	Juan Pablo Jurado	
740	3.1.5	1.4.2.18	Risk ID & Risk Assessment - Pension Plan	232d	8/11/14	7/1/15	87%	Juan Pablo Jurado	
741	3.1.5	1.4.2.18.	Description of the line of business and its objectives	10d	8/11/14	8/22/14	100%	Juan Pablo Jurado	
742	3.1.5	1.4.2.18.	Identification and inventory of events and risks	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
743	3.1.5	1.4.2.18.	Determination of prioritized risks for the line of business	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
744	3.1.5	1.4.2.18.	Assessment of the quality of the controls in place and Quality of Risk Management to mitigate for a subset of the prioritized risks	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
745	3.1.5	1.4.2.18.	Deduction of Residual Risk Rating by combining the Inherent Risk ratings and Control Effectiveness Ratings for each risk event	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	



ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
746	3.1.5	1.4.2.18.	Development of action plans based on risk assessment results	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
747	3.1.5	1.4.2.18.	Aggregation of risk for the line of business by assessing the Inherent Risk, Control Effectiveness and Residual Risk for the line of business	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
748	3.1.5	1.4.2.18.	Review, validation and challenge by PMO, Internal Control, Second Line of Defense and responsible of transversal risks	139d	10/20/14	4/30/15	83%	Juan Pablo Jurado	
749	3.1.5	1.4.2.18.	Development of Final Report	31d	5/1/15	6/12/15	0%	Juan Pablo Jurado	
750	3.1.5	1.4.2.18.	Presentation of results of Risk ID & Risk Assessment in the Line of Business Forum/Committee	12d	6/15/15	6/30/15	0%	Juan Pablo Jurado	
751	3.1.5	1.4.2.18.	Milestone: Risk ID & Risk Assessment for Pension Plan complete	0d	7/1/15	7/1/15	0%	Juan Pablo Jurado	
752	3.1.5	1.4.2.19	Risk ID & Risk Assessment - Island Finance	537d	8/11/14	8/31/16	87%	Juan Pablo Jurado	
753	3.1.5	1.4.2.19.	Description of the line of business and its objectives	10d	8/11/14	8/22/14	100%	Juan Pablo Jurado	
754	3.1.5	1.4.2.19.	Identification and inventory of events and risks	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
755	3.1.5	1.4.2.19.	Determination of prioritized risks for the line of business	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
756	3.1.5	1.4.2.19.	Assessment of the quality of the controls in place and Quality of Risk Management to mitigate for a subset of the prioritized risks	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
757	3.1.5	1.4.2.19.	Deduction of Residual Risk Rating by combining the Inherent Risk ratings and Control Effectiveness Ratings for each risk event	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
758	3.1.5	1.4.2.19.	Development of action plans based on risk assessment results	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
759	3.1.5	1.4.2.19.	Aggregation of risk for the line of business by assessing the Inherent Risk, Control Effectiveness and Residual Risk for the line of business	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
760	3.1.5	1.4.2.19.	Review, validation and challenge by PMO, Internal Control, Second Line of Defense and responsible of transversal risks	139d	10/20/14	4/30/15	83%	Juan Pablo Jurado	
761	3.1.5	1.4.2.19.	Development of Final Report	31d	7/1/16	8/12/16	0%	Juan Pablo Jurado	
762	3.1.5	1.4.2.19.	Presentation of results of Risk ID & Risk Assessment in the Line of Business Forum/Committee	12d	8/15/16	8/30/16	0%	Juan Pablo Jurado	
763	3.1.5	1.4.2.19.	Milestone: Risk ID & Risk Assessment for Island Finance complete	0d	8/31/16	8/31/16	0%	Juan Pablo Jurado	
764	3.1.5	1.4.2.20	Risk ID & Risk Assessment - Special Assets	232d	8/11/14	7/1/15	87%	Juan Pablo Jurado	
765	3.1.5	1.4.2.20.	Description of the line of business and its objectives	10d	8/11/14	8/22/14	100%	Juan Pablo Jurado	
766	3.1.5	1.4.2.20.	Identification and inventory of events and risks	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
767	3.1.5	1.4.2.20.	Determination of prioritized risks for the line of business	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	

ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
768	3.1.5	1.4.2.20.	Assessment of the quality of the controls in place and Quality of Risk Management to mitigate for a subset of the prioritized risks	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
769	3.1.5	1.4.2.20.	Deduction of Residual Risk Rating by combining the Inherent Risk ratings and Control Effectiveness Ratings for each risk event	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
770	3.1.5	1.4.2.20.	Development of action plans based on risk assessment results	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
771	3.1.5	1.4.2.20.	Aggregation of risk for the line of business by assessing the Inherent Risk, Control Effectiveness and Residual Risk for the line of business	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
772	3.1.5	1.4.2.20.	Review, validation and challenge by PMO, Internal Control, Second Line of Defense and responsible of transversal risks	139d	10/20/14	4/30/15	83%	Juan Pablo Jurado	
773	3.1.5	1.4.2.20.	Development of Final Report	31d	5/1/15	6/12/15	0%	Juan Pablo Jurado	
774	3.1.5	1.4.2.20.	Presentation of results of Risk ID & Risk Assessment in the Line of Business Forum/Committee	12d	6/15/15	6/30/15	0%	Juan Pablo Jurado	
775	3.1.5	1.4.2.20.	<i>Milestone: Risk ID &amp; Risk Assessment for Special Assets complete</i>	<i>0d</i>	<i>7/1/15</i>	<i>7/1/15</i>	<i>0%</i>	<i>Juan Pablo Jurado</i>	
776	3.1.5	1.4.2.21	<b>Risk ID &amp; Risk Assessment - Santander Overseas Bank</b>	<b>232d</b>	<b>8/11/14</b>	<b>7/1/15</b>	<b>87%</b>	<b>Juan Pablo Jurado</b>	
777	3.1.5	1.4.2.21.	Description of the line of business and its objectives	10d	8/11/14	8/22/14	100%	Juan Pablo Jurado	
778	3.1.5	1.4.2.21.	Identification and inventory of events and risks	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
779	3.1.5	1.4.2.21.	Determination of prioritized risks for the line of business	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
780	3.1.5	1.4.2.21.	Assessment of the quality of the controls in place and Quality of Risk Management to mitigate for a subset of the prioritized risks	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
781	3.1.5	1.4.2.21.	Deduction of Residual Risk Rating by combining the Inherent Risk ratings and Control Effectiveness Ratings for each risk event	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
782	3.1.5	1.4.2.21.	Development of action plans based on risk assessment results	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
783	3.1.5	1.4.2.21.	Aggregation of risk for the line of business by assessing the Inherent Risk, Control Effectiveness and Residual Risk for the line of business	51d	8/11/14	10/20/14	100%	Juan Pablo Jurado	
784	3.1.5	1.4.2.21.	Review, validation and challenge by PMO, Internal Control, Second Line of Defense and responsible of transversal risks	139d	10/20/14	4/30/15	83%	Juan Pablo Jurado	
785	3.1.5	1.4.2.21.	Development of Final Report	31d	5/1/15	6/12/15	0%	Juan Pablo Jurado	
786	3.1.5	1.4.2.21.	Presentation of results of Risk ID & Risk Assessment in the Line of Business Forum/Committee	12d	6/15/15	6/30/15	0%	Juan Pablo Jurado	
787	3.1.5	1.4.2.21.	<i>Milestone: Risk ID &amp; Risk Assessment for SOB complete</i>	<i>0d</i>	<i>7/1/15</i>	<i>7/1/15</i>	<i>0%</i>	<i>Juan Pablo Jurado</i>	
788	3.1.5	1.4.2.22	Presentation of Consolidated Risk ID & Risk Assessment results in EMC, ROC, BERC and BOD	7d	6/22/15	6/30/15	0%	Juan Pablo Jurado	
789	3.1.5	1.4.2.23	Risk ID & Risk Assessment refreshment based on the Strategic Plan review	43d	11/3/14	12/31/14	100%	Juan Pablo Jurado	

ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
790	3.1.5	1.4.2.24	Ascertain that the Internal Control area is included in the validation and review of the results of the Risk Identification and Assessment process	80d	8/11/14	11/28/14	100%	Juan Pablo Jurado	
791	3.1.5	1.4.2.25	Integrate Risk ID & Assessment results in defining idiosyncratic scenarios for Capital Stress Test	43d	10/1/14	11/28/14	100%	Juan Pablo Jurado	
792	3.1.5	1.4.2.26	Milestone: 2014 Risk ID and Assessment Process complete	0d	6/30/15	6/30/15	0%	Juan Pablo Jurado	
793	3.1.5	1.4.2.27	Risk ID & Risk Assessment Methodology (2015)	184d	4/20/15	12/31/15	0%	Juan Pablo Jurado	
794	3.1.5	1.4.2.27.	Review Risk ID & Risk Assessment Methodology and Guideline	9d	4/20/15	4/30/15	0%	Juan Pablo Jurado	
795	3.1.5	1.4.2.27.	Gap Assessment between local and SHUSA Risk ID & Risk Assessment Methodology and Guideline	18d	4/20/15	5/13/15	0%	Juan Pablo Jurado	
796	3.1.5	1.4.2.27.	Update Risk ID & Assessment Methodology & Guideline	18d	4/20/15	5/13/15	0%	Juan Pablo Jurado	
797	3.1.5	1.4.2.27.	Integrate Risk ID & Assessment results in defining idiosyncratic scenarios for Capital Stress Test	44d	11/2/15	12/31/15	0%	Juan Pablo Jurado	
798	3.1.5	1.4.2.27.	Risk ID & Assessment tool (sharepoint implementation)	44d	11/2/15	12/31/15	0%	Juan Pablo Jurado	
799	3.1.5	1.4.2.27.	Milestone: 2016 Methodology for Risk ID and Assessment Approved	0d	12/31/15	12/31/15	0%	Juan Pablo Jurado	
800	3.1.5	1.4.2.28	Methodology, Metrics and Limits	21d	4/15/15	5/13/15	0%	Juan Pablo Jurado	
801	3.1.5	1.4.2.28.	Risk Assessment Methodology	21d	4/15/15	5/13/15	0%	Juan Pablo Jurado	
802	3.1.5	1.4.2.28.	Revise Risk Assessment Methodology Bancorp	18d	4/20/15	5/13/15	0%	Juan Pablo Jurado	
803	3.1.5	1.4.2.28.	Revise Risk Assessment Methodology Bancorp 2015	18d	4/20/15	5/13/15	0%	Juan Pablo Jurado	
804	3.1.5	1.4.2.28.	Revise Risk Assessment Methodology SFS 2015	18d	4/20/15	5/13/15	0%	Juan Pablo Jurado	
805	3.1.5	1.4.2.28.	Revise Risk Assessment Methodology Overseas 2015	18d	4/20/15	5/13/15	0%	Juan Pablo Jurado	
806	3.1.5	1.4.2.28.	Milestone: 2015 Risk Assessment Methodology Approved	0d	5/13/15	5/13/15	0%	Juan Pablo Jurado	
807	3.1.5	1.4.2.29	Planning Risk ID & Assessment 2015	57d	1/12/15	3/31/15	100%	Juan Pablo Jurado	
808	3.1.5	1.4.2.29.	Identify primary contacts to work with SHUSA-ERM	6d	1/12/15	1/19/15	100%	Juan Pablo Jurado	
809	3.1.5	1.4.2.29.	Secure sufficient resources to complete assessments in agreed time	36d	1/12/15	3/2/15	100%	Juan Pablo Jurado	
810	3.1.5	1.4.2.29.	Complete requested documents and maintain	52d	1/19/15	3/31/15	100%	Juan Pablo Jurado	
811	3.1.5	1.4.2.30	Execution - Business Entity completion of 2015 Risk ID and Assessment Templates	99d	4/16/15	9/1/15	0%	Juan Pablo Jurado	

ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
812	3.1.5	1.4.2.30.	Complete all required sections of templates for each business line	65d	4/16/15	7/15/15	0%	Juan Pablo Jurado	
813	3.1.5	1.4.2.30.	Provide completed templates to SHUSA-ERM for review	44d	5/15/15	7/15/15	0%	Juan Pablo Jurado	
814	3.1.5	1.4.2.30.	Make any additional changes deemed necessary by SHUSA-ERM	45d	6/1/15	7/31/15	0%	Juan Pablo Jurado	
815	3.1.5	1.4.2.30.	Obtain all required 2nd line reviews and challenges	21d	8/3/15	8/31/15	0%	Juan Pablo Jurado	
816	3.1.5	1.4.2.30.	Provide all approved templates to SHUSA-ERM	1d	9/1/15	9/1/15	0%	Juan Pablo Jurado	
817	<b>3.1.5</b>	<b>1.4.2.31</b>	<b>Aggregation, Reporting and Governance</b>	<b>16d</b>	<b>9/1/15</b>	<b>9/22/15</b>	<b>0%</b>	<b>Juan Pablo Jurado</b>	
818	3.1.5	1.4.2.31.	Aggregate results	1d	9/1/15	9/1/15	0%	Juan Pablo Jurado	
819	3.1.5	1.4.2.31.	Create reports	1d	9/1/15	9/1/15	0%	Juan Pablo Jurado	
820	3.1.5	1.4.2.31.	Review reports with Unit ERM	10d	9/2/15	9/15/15	0%	Juan Pablo Jurado	
821	3.1.5	1.4.2.31.	Business Unit reviews and accepts reports	11d	9/8/15	9/22/15	0%	Juan Pablo Jurado	
822	3.1.5	1.4.2.31.	Present to Entity Committees for challenge	1d	9/22/15	9/22/15	0%	Juan Pablo Jurado	
823	<b>3.1.3</b>	<b>1.4.3</b>	<b>Miami</b>	<b>182d?</b>	<b>1/12/15</b>	<b>9/22/15</b>	<b>2%</b>	<b>Lourdes Madariaga</b>	
824	<b>3.1.3</b>	<b>1.4.3.1</b>	<b>Planning</b>	<b>133d?</b>	<b>1/12/15</b>	<b>7/15/15</b>	<b>6%</b>	<b>Paulo Prado</b>	
825	3.1.3	1.4.3.1.1	Identify primary contacts to work with SHUSA-ERM	6d	1/12/15	1/17/15	100%	Paulo Prado	
826	3.1.3	1.4.3.1.2	Secure sufficient resources to complete assessments in agreed time	23d	4/1/15	5/1/15	0%	Paulo Prado	
827	3.1.3	1.4.3.1.3	Complete requested documents and maintain	23d	4/1/15	5/1/15	0%	Paulo Prado	
828	3.1.3	1.4.3.1.4	Conduct workshops	54d	5/1/15	7/15/15	0%	Paulo Prado	
829	<b>3.1.3</b>	<b>1.4.3.2</b>	<b>Execution - Business Entity completion of 2015 Risk ID and Assessment Templates</b>	<b>99d?</b>	<b>5/1/15</b>	<b>9/16/15</b>	<b>0%</b>	<b>Paulo Prado</b>	
830	3.1.3	1.4.3.2.1	Complete all required sections of templates for each business line	54d	5/1/15	7/15/15	0%	Paulo Prado	
831	3.1.3	1.4.3.2.2	Provide subset of completed templates to SHUSA-ERM for review	44d?	5/15/15	7/15/15	0%	Paulo Prado	
832	3.1.3	1.4.3.2.3	Make any additional changes deemed necessary by SHUSA-ERM	45d?	6/1/15	7/31/15	0%	Paulo Prado	
833	3.1.3	1.4.3.2.4	Obtain all required 2nd line reviews and challenges	22d?	8/1/15	8/31/15	0%	Paulo Prado	

ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
834	3.1.3	1.4.3.2.5	Provide all approved templates to SHUSA-ERM	1d?	9/1/15	9/1/15	0%	Paulo Prado	
835	<b>3.1.3</b>	<b>1.4.3.3</b>	<b>Aggregation, Reporting and Governance</b>	<b>16d?</b>	<b>9/1/15</b>	<b>9/22/15</b>	<b>0%</b>	<b>Paulo Prado</b>	
836	3.1.3	1.4.3.3.1	Aggregate results	1d?	9/1/15	9/1/15	0%	Paulo Prado	
837	3.1.3	1.4.3.3.2	Create reports	1d?	9/1/15	9/1/15	0%	Paulo Prado	
838	3.1.3	1.4.3.3.3	Review reports with Unit ERM	10d?	9/2/15	9/15/15	0%	Paulo Prado	
839	3.1.3	1.4.3.3.4	Business Unit reviews and accepts reports	11d?	9/8/15	9/22/15	0%	Paulo Prado	
840	3.1.3	1.4.3.3.5	Present to Entity Committees for challenge	1d?	9/22/15	9/22/15	0%	Paulo Prado	
841	<b>3.1.4</b>	<b>1.4.4</b>	<b>New York</b>	<b>145d</b>	<b>3/23/15</b>	<b>10/9/15</b>	<b>1%</b>	<b>Jim Bathon</b>	
842	<b>3.1.4</b>	<b>1.4.4.1</b>	<b>Santander Investment Securities</b>	<b>140d</b>	<b>3/30/15</b>	<b>10/9/15</b>	<b>0%</b>	<b>Jim Bathon</b>	
843	<b>3.1.4</b>	<b>1.4.4.1.1</b>	<b>Planning</b>	<b>35d</b>	<b>3/30/15</b>	<b>5/15/15</b>	<b>0%</b>	<b>Jim Bathon</b>	
844	3.1.4	1.4.4.1.1	Identify primary contact to work with SHUSA-ERM	10d	4/13/15	4/24/15	0%	Jim Bathon	
845	3.1.4	1.4.4.1.1	Secure Staffing	10d	4/27/15	5/8/15	0%	Jim Bathon	
846	3.1.4	1.4.4.1.1	Schedule workshops	5d	5/11/15	5/15/15	0%	Jim Bathon	
847	3.1.4	1.4.4.1.1	Complete requested documents and maintain	10d	3/30/15	4/10/15	0%	Jim Bathon	
848	<i>3.1.4</i>	<i>1.4.4.1.1</i>	<i>Milestone: Planning for Risk ID and Assessment complete</i>	<i>0d</i>	<i>5/15/15</i>	<i>5/15/15</i>	<i>0%</i>	<i>Jim Bathon</i>	
849	<b>3.1.4</b>	<b>1.4.4.1.2</b>	<b>Execution - Business Entity completion of 2015 Risk ID and Assessment Templates</b>	<b>45d</b>	<b>5/18/15</b>	<b>7/17/15</b>	<b>0%</b>	<b>Jim Bathon</b>	
850	<b>3.1.4</b>	<b>1.4.4.1.2</b>	<b>Complete all required sections of templates for each business line</b>	<b>30d</b>	<b>5/18/15</b>	<b>6/26/15</b>	<b>0%</b>	<b>Jim Bathon</b>	
851	3.1.4	1.4.4.1.2	Line of Business - GBM - Cash Equities Brokerage	5d	5/18/15	5/22/15	0%	Jim Bathon	
852	3.1.4	1.4.4.1.2	Line of Business - Financial Management (ALM)	5d	5/25/15	5/29/15	0%	Jim Bathon	
853	3.1.4	1.4.4.1.2	Line of Business - GBM - Equity and Debt Underwriting	5d	6/1/15	6/5/15	0%	Jim Bathon	
854	3.1.4	1.4.4.1.2	Line of Business - GBM - Fixed Income / Bond Trading	5d	6/8/15	6/12/15	0%	Jim Bathon	
855	3.1.4	1.4.4.1.2	Line of Business - GBM - Futures Brokerage Activity	5d	6/15/15	6/19/15	0%	Jim Bathon	
856	3.1.4	1.4.4.1.2	Line of Business - GBM - Fixed Income and Equity Research	5d	6/22/15	6/26/15	0%	Jim Bathon	
857	3.1.4	1.4.4.1.2	Line of Business - GBM - Equity and Debt Underwriting	5d	6/8/15	6/12/15	0%	Jim Bathon	
858	3.1.4	1.4.4.1.2	Line of Business - GBM - Fixed Income / Bond Trading	5d	6/15/15	6/19/15	0%	Jim Bathon	

ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
859	3.1.4	1.4.4.1.2	Line of Business - GBM - Futures Brokerage Activity	5d	6/22/15	6/26/15	0%	Jim Bathon	
860	<b>3.1.4</b>	<b>1.4.4.1.2</b>	<b>Make any additional changes deemed necessary by SHUSA-ERM</b>	<b>25d</b>	<b>6/1/15</b>	<b>7/3/15</b>	<b>0%</b>	<b>Jim Bathon</b>	
861	3.1.4	1.4.4.1.2	Line of Business - GBM - Cash Equities Brokerage	5d	6/1/15	6/5/15	0%	Jim Bathon	
862	3.1.4	1.4.4.1.2	Line of Business - Financial Management (ALM)	5d	6/1/15	6/5/15	0%	Jim Bathon	
863	3.1.4	1.4.4.1.2	Line of Business - GBM - Equity and Debt Underwriting	5d	6/15/15	6/19/15	0%	Jim Bathon	
864	3.1.4	1.4.4.1.2	Line of Business - GBM - Fixed Income / Bond Trading	5d	6/22/15	6/26/15	0%	Jim Bathon	
865	3.1.4	1.4.4.1.2	Line of Business - GBM - Futures Brokerage Activity	5d	6/29/15	7/3/15	0%	Jim Bathon	
866	<b>3.1.4</b>	<b>1.4.4.1.2</b>	<b>Obtain all required 2nd line reviews and challenges</b>	<b>30d</b>	<b>6/8/15</b>	<b>7/17/15</b>	<b>0%</b>	<b>Jim Bathon</b>	
867	3.1.4	1.4.4.1.2	Line of Business - GBM - Cash Equities Brokerage	10d	6/8/15	6/19/15	0%	Jim Bathon	
868	3.1.4	1.4.4.1.2	Line of Business - Financial Management (ALM)	10d	6/8/15	6/19/15	0%	Jim Bathon	
869	3.1.4	1.4.4.1.2	Line of Business - GBM - Equity and Debt Underwriting	10d	6/22/15	7/3/15	0%	Jim Bathon	
870	3.1.4	1.4.4.1.2	Line of Business - GBM - Fixed Income / Bond Trading	10d	6/29/15	7/10/15	0%	Jim Bathon	
871	3.1.4	1.4.4.1.2	Line of Business - GBM - Futures Brokerage Activity	10d	7/6/15	7/17/15	0%	Jim Bathon	
872	3.1.4	1.4.4.1.2	Line of Business - GBM - Fixed Income and Equity Research	10d	6/29/15	7/10/15	0%	Jim Bathon	
873	<i>3.1.4</i>	<i>1.4.4.1.2</i>	<i>Milestone: Provide all approved templates to SHUSA ERM</i>	<i>0d</i>	<i>7/17/15</i>	<i>7/17/15</i>	<i>0%</i>	<i>Jim Bathon</i>	
874	<i>3.1.4</i>	<i>1.4.4.1.2</i>	<i>Milestone: Execution of Risk ID and Assessment complete</i>	<i>0d</i>	<i>7/17/15</i>	<i>7/17/15</i>	<i>0%</i>	<i>Paulo Prado</i>	
875	<b>3.1.4</b>	<b>1.4.4.1.3</b>	<b>Aggregation, Reporting and Governance</b>	<b>60d</b>	<b>7/20/15</b>	<b>10/9/15</b>	<b>0%</b>	<b>Jim Bathon</b>	
876	3.1.4	1.4.4.1.3	Aggregate results	5d	7/20/15	7/24/15	0%	Jim Bathon	
877	3.1.4	1.4.4.1.3	Create reports	5d	7/27/15	7/31/15	0%	Jim Bathon	
878	3.1.4	1.4.4.1.3	Review reports with Unit ERM	10d	8/3/15	8/14/15	0%	Jim Bathon	
879	3.1.4	1.4.4.1.3	Business Unit reviews and accepts reports	10d	8/17/15	8/28/15	0%	Jim Bathon	
880	3.1.4	1.4.4.1.3	Present to Entity Committees for challenge - Risk Committee	10d	8/31/15	9/11/15	0%	Jim Bathon	
881	3.1.4	1.4.4.1.3	Present to Entity Committees for challenge - Management Committee	10d	9/14/15	9/25/15	0%		
882	3.1.4	1.4.4.1.3	Present to Entity Committees for challenge - Board	10d	9/28/15	10/9/15	0%		
883	<i>3.1.4</i>	<i>1.4.4.1.3</i>	<i>Milestone: Reporting of Risk ID and Assessment complete</i>	<i>0d</i>	<i>10/9/15</i>	<i>10/9/15</i>	<i>0%</i>	<i>Jim Bathon</i>	
884	<b>3.1.4</b>	<b>1.4.4.2</b>	<b>New York Branch</b>	<b>125d</b>	<b>3/23/15</b>	<b>9/11/15</b>	<b>4%</b>	<b>Jim Bathon</b>	

ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
885	<b>3.1.4</b>	<b>1.4.4.2.1</b>	<b>Planning</b>	<b>20d</b>	<b>3/23/15</b>	<b>4/17/15</b>	<b>17%</b>	<b>Jim Bathon</b>	
886	3.1.4	1.4.4.2.1	Identify primary contact to work with SHUSA-ERM	5d	3/23/15	3/27/15	100%	Jim Bathon	
887	3.1.4	1.4.4.2.1	Secure Staffing	10d	3/30/15	4/10/15	0%	Jim Bathon	
888	3.1.4	1.4.4.2.1	Schedule workshops	5d	4/13/15	4/17/15	0%	Jim Bathon	
889	3.1.4	1.4.4.2.1	Complete requested documents and maintain	10d	3/30/15	4/10/15	0%	Jim Bathon	
890	<i>3.1.4</i>	<i>1.4.4.2.1</i>	<i>Milestone: Planning for Risk ID and Assessment complete</i>	<i>0d</i>	<i>4/17/15</i>	<i>4/17/15</i>	<i>0%</i>	<i>Jim Bathon</i>	
891	<b>3.1.4</b>	<b>1.4.4.2.2</b>	<b>Execution - Business Entity completion of 2015 Risk ID and Assessment Templates</b>	<b>41d</b>	<b>4/24/15</b>	<b>6/19/15</b>	<b>0%</b>	<b>Jim Bathon</b>	
892	<b>3.1.4</b>	<b>1.4.4.2.2</b>	<b>Complete all required sections of templates for each business line</b>	<b>10d</b>	<b>4/24/15</b>	<b>5/7/15</b>	<b>0%</b>	<b>Jim Bathon</b>	
893	3.1.4	1.4.4.2.2	Line of Business - Commercial Banking (Loans, LOC, Deposit Taking)	5d	4/24/15	4/30/15	0%	Jim Bathon	
894	3.1.4	1.4.4.2.2	Line of Business - Swaps Dealing	5d	5/1/15	5/7/15	0%	Jim Bathon	
895	<b>3.1.4</b>	<b>1.4.4.2.2</b>	<b>Provide subset of completed templates to SHUSA-ERM for review</b>	<b>10d</b>	<b>5/8/15</b>	<b>5/21/15</b>	<b>0%</b>		
896	3.1.4	1.4.4.2.2	Line of Business - Commercial Banking (Loans, LOC, Deposit Taking)	5d	5/15/15	5/21/15	0%	Jim Bathon	
897	3.1.4	1.4.4.2.2	Line of Business - Swaps Dealing	5d	5/8/15	5/14/15	0%	Jim Bathon	
898	<b>3.1.4</b>	<b>1.4.4.2.2</b>	<b>Make any additional changes deemed necessary by SHUSA-ERM</b>	<b>16d</b>	<b>5/15/15</b>	<b>6/5/15</b>	<b>0%</b>	<b>Jim Bathon</b>	
899	3.1.4	1.4.4.2.2	Line of Business - Commercial Banking (Loans, LOC, Deposit Taking)	5d	6/1/15	6/5/15	0%	Jim Bathon	
900	3.1.4	1.4.4.2.2	Line of Business - Swaps Dealing	5d	5/15/15	5/21/15	0%	Jim Bathon	
901	<b>3.1.4</b>	<b>1.4.4.2.2</b>	<b>Obtain all required 2nd line reviews and challenges</b>	<b>21d</b>	<b>5/22/15</b>	<b>6/19/15</b>	<b>0%</b>	<b>Jim Bathon</b>	
902	3.1.4	1.4.4.2.2	Line of Business - Commercial Banking (Loans, LOC, Deposit Taking)	10d	6/8/15	6/19/15	0%	Jim Bathon	
903	3.1.4	1.4.4.2.2	Line of Business - Swaps Dealing	10d	5/22/15	6/4/15	0%	Jim Bathon	
904	<i>3.1.4</i>	<i>1.4.4.2.2</i>	<i>Milestone: Provide all approved templates to SHUSA ERM</i>	<i>0d</i>	<i>6/19/15</i>	<i>6/19/15</i>	<i>0%</i>	<i>Jim Bathon</i>	
905	<i>3.1.4</i>	<i>1.4.4.2.2</i>	<i>Milestone: Execution of Risk ID and Assessment complete</i>	<i>0d</i>	<i>6/19/15</i>	<i>6/19/15</i>	<i>0%</i>	<i>Paulo Prado</i>	
906	<b>3.1.4</b>	<b>1.4.4.2.3</b>	<b>Aggregation, Reporting and Governance</b>	<b>60d</b>	<b>6/22/15</b>	<b>9/11/15</b>	<b>0%</b>	<b>Jim Bathon</b>	
907	3.1.4	1.4.4.2.3	Aggregate results	5d	6/22/15	6/26/15	0%	Jim Bathon	
908	3.1.4	1.4.4.2.3	Create reports	5d	6/29/15	7/3/15	0%	Jim Bathon	
909	3.1.4	1.4.4.2.3	Review reports with Unit ERM	10d	7/6/15	7/17/15	0%	Jim Bathon	



ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
910	3.1.4	1.4.4.2.3	Business Unit reviews and accepts reports	10d	7/20/15	7/31/15	0%	Jim Bathon	
911	3.1.4	1.4.4.2.3	Present to Entity Risk Committee for challenge	10d	8/3/15	8/14/15	0%	Jim Bathon	
912	3.1.4	1.4.4.2.3	Present to Entity Management Committee for challenge	10d	8/17/15	8/28/15	0%		
913	3.1.4	1.4.4.2.3	Present to Board for challenge	10d	8/31/15	9/11/15	0%		
914	3.1.4	1.4.4.2.3	Milestone: Reporting of Risk ID and Assessment complete	0d	9/11/15	9/11/15	0%	Jim Bathon	
915		1.4.5	Remaining CUSO Entiites: ANTSUS, BSTI,TOTTA Y ACORES, SAM - PR and US	30d	6/29/15	8/7/15	0%	Diane Allaire	
916		1.4.5.1	Determine what Risk ID and Assessment process is needed at these remaining entities	30d	6/29/15	8/7/15	0%	Diane Allaire	
917		1.5	Risk Tolerance	635d?	9/23/13	2/29/16	48%	Brian Lynch	
918	3.1.1	1.5.1	SHUSA	555d?	12/15/13	1/31/16	59%	Brian Lynch	
919	3.1.1	1.5.1.1	Establish Enterprise Risk Policy for Risk Tolerance	206d	1/1/14	10/15/14	100%	Brian Lynch	Brian Lynch
920	3.1.1	1.5.1.1.1	Establish Risk Tolerance Policy	86d	1/1/14	4/30/14	100%	Brian Lynch	Brian Lynch
921	3.1.1	1.5.1.1.2	Establish Risk Tolerance Procedure	68d	7/14/14	10/15/14	100%	Brian Lynch	Brian Lynch
922	3.1.1	1.5.1.1.3	Establish Risk Mandate Procedure	56d	6/15/14	8/29/14	100%	Brian Lynch	Brian Lynch
923	3.1.1	1.5.1.2	Establish Risk Tolerance Framework	310d	3/24/14	6/1/15	56%	Brian Lynch	Brian Lynch
924	3.1.1	1.5.1.2.1	Create first draft	30d	2/16/15	3/27/15	100%	Brian Lynch	Brian Lynch
925	3.1.1	1.5.1.2.2	Create second draft	10d	3/24/14	4/3/15	50%	Brian Lynch	Brian Lynch
926	3.1.1	1.5.1.2.3	Socialize draft with Finance and Risk senior mgmt	10d	4/6/15	4/17/15	0%	Brian Lynch	Brian Lynch
927	3.1.1	1.5.1.2.4	Provide draft to ERMCI for Review and approval	1d	5/6/15	5/6/15	0%	Brian Lynch	Brian Lynch
928	3.1.1	1.5.1.2.5	Provide to BERC for Review and approval	4d	5/25/15	5/28/15	0%	Brian Lynch	Brian Lynch
929	3.1.1	1.5.1.2.6	Provide to Board for Review and approval	7d	5/21/15	5/29/15	0%	Brian Lynch	Brian Lynch
930	3.1.1	1.5.1.2.7	Milestone: Risk Tolerance Framework Implemented	0d	6/1/15	6/1/15	0%	Brian Lynch	Brian Lynch
931	3.1.1	1.5.1.3	US RTS development	76d	12/15/13	3/31/14	100%	Brian Lynch	Brian Lynch
932	3.1.1	1.5.1.3.1	Limits, EWI and discussions with Risk Management Areas (RMAs) and CROs	77d	12/15/13	3/31/14	100%	Brian Lynch	Brian Lynch
933	3.1.1	1.5.1.3.2	US RTS Submissions and Approvals at the US Advisory Board	1d	3/31/14	3/31/14	100%	Brian Lynch	Brian Lynch
934	3.1.1	1.5.1.4	Review US RTS against Banco Santander SA RT Framework	65d	4/1/14	6/30/14	100%	Brian Lynch	Brian Lynch
935	3.1.1	1.5.1.4.1	Incorporate identified gaps	65d	4/1/14	6/30/14	100%	Brian Lynch	Brian Lynch

ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
936	<b>3.1.1</b>	<b>1.5.1.5</b>	<b>SHUSA RTS preparation and discussion</b>	<b>24d</b>	<b>4/8/14</b>	<b>5/9/14</b>	<b>100%</b>	<b>Brian Lynch</b>	<b>Brian Lynch</b>
937	<b>3.1.1</b>	<b>1.5.1.5.1</b>	<b>Limits, EWI and discussions with Risk Management Areas (RMAs)</b>	<b>24d</b>	<b>4/8/14</b>	<b>5/9/14</b>	<b>100%</b>	<b>Brian Lynch</b>	<b>Brian Lynch</b>
938	3.1.1	1.5.1.5.1	Credit Risk	24d	4/8/14	5/9/14	100%	Brian Lynch	Brian Lynch
939	3.1.1	1.5.1.5.1	Market Risk	24d	4/8/14	5/9/14	100%	Brian Lynch	Brian Lynch
940	3.1.1	1.5.1.5.1	Operational Risk	24d	4/8/14	5/9/14	100%	Brian Lynch	Brian Lynch
941	3.1.1	1.5.1.5.1	Compliance Risk	24d	4/8/14	5/9/14	100%	Brian Lynch	Brian Lynch
942	3.1.1	1.5.1.5.1	4R	24d	4/8/14	5/9/14	100%	Brian Lynch	Brian Lynch
943	3.1.1	1.5.1.5.1	Model Risk	24d	4/8/14	5/9/14	100%	Brian Lynch	Brian Lynch
944	3.1.1	1.5.1.5.1	Data Risk	24d	4/8/14	5/9/14	100%	Brian Lynch	Brian Lynch
945	3.1.1	1.5.1.5.1	Chief Financial Officer	24d	4/8/14	5/9/14	100%	Brian Lynch	Brian Lynch
946	3.1.1	1.5.1.5.1	Chief Risk Officer	24d	4/8/14	5/9/14	100%	Brian Lynch	Brian Lynch
947	3.1.1	1.5.1.5.1	Chief Executive Officer	24d	4/8/14	5/9/14	100%	Brian Lynch	Brian Lynch
948	<b>3.1.1</b>	<b>1.5.1.6</b>	<b>SHUSA RTS Submissions and Approvals</b>	<b>52d</b>	<b>5/15/14</b>	<b>7/25/14</b>	<b>100%</b>	<b>Brian Lynch</b>	<b>Brian Lynch</b>
949	3.1.1	1.5.1.6.1	Submission of RTS	1d	5/15/14	5/15/14	100%	Brian Lynch	Brian Lynch
950	3.1.1	1.5.1.6.2	Circulate Draft to all EMC Members	1d	5/15/14	5/15/14	100%	Brian Lynch	Brian Lynch
951	3.1.1	1.5.1.6.3	Final draft submitted to BERC	16d	5/30/14	6/20/14	100%	Brian Lynch	Brian Lynch
952	3.1.1	1.5.1.6.4	Presentation to BERC	1d	6/26/14	6/26/14	100%	Brian Lynch	Brian Lynch
953	3.1.1	1.5.1.6.5	Presentation to Board of Directors	1d	6/30/14	6/30/14	100%	Brian Lynch	Brian Lynch
954	3.1.1	1.5.1.6.6	Include comments from BERC	12d	5/26/14	6/10/14	100%	Brian Lynch	Brian Lynch
955	3.1.1	1.5.1.6.7	New presentation to the BERC	29d	6/16/14	7/24/14	100%	Brian Lynch	Brian Lynch
956	3.1.1	1.5.1.6.8	New presentation to the Board of Directors	30d	6/16/14	7/25/14	100%	Brian Lynch	Brian Lynch
957	<b>3.1.1</b>	<b>1.5.1.7</b>	<b>SHUSA RTS implementation</b>	<b>196d</b>	<b>7/1/14</b>	<b>3/31/15</b>	<b>92%</b>	<b>Brian Lynch</b>	<b>Brian Lynch</b>
958	3.1.1	1.5.1.7.1	Calculate 2014 RTS core metric actual values	44d	7/1/14	8/29/14	100%	Brian Lynch	Brian Lynch
959	3.1.1	1.5.1.7.2	RTS reasonable check and continued calibration - dependency on SHUSA Board and BERC approval. Mtg in March - dependency on incorporating Corporate mandated risk tolerance metrics	173d	8/1/14	3/31/15	80%	Brian Lynch	Brian Lynch

ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
960	3.1.1	1.5.1.7.3	Schedule review of Strategic Plan for Alignment to Risk Tolerance	45d	9/30/14	11/30/14	100%	Brian Lynch	Brian Lynch
961	3.1.1	1.5.1.7.4	Develop and document process for collection of historical and current metric measures (Procedure)	66d	7/1/14	9/30/14	100%	Brian Lynch	Brian Lynch
962	3.1.1	1.5.1.7.5	Define standard reporting format and audience	44d	10/1/14	11/30/14	100%	Brian Lynch	Brian Lynch
963	3.1.1	1.5.1.7.6	Implement reporting and escalation processes	23d	12/1/14	12/31/14	100%	Brian Lynch	Brian Lynch
964	3.1.1	1.5.1.7.7	Discuss RTS program with Risk Architecture lead	15d	2/16/15	3/6/15	100%	Brian Lynch	Brian Lynch
965	<b>3.1.1</b>	<b>1.5.1.8</b>	<b>SHUSA RTS Metrics for Corporate and SHUSA</b>	<b>50d</b>	<b>3/16/15</b>	<b>5/25/15</b>	<b>20%</b>	<b>Brian Lynch</b>	
966	3.1.1	1.5.1.8.1	Finalization of Corporate metrics (ie. Ability to calculate limits with defensible rationale)	5d	3/16/15	3/20/15	100%	Brian Lynch	Brian Lynch
967	3.1.1	1.5.1.8.2	Corporate metrics review with SHUSA EMC / ERM	5d	3/23/15	3/27/15	100%	Brian Lynch	Brian Lynch
968	3.1.1	1.5.1.8.3	Corporate metric review with Pepe Corral	5d	3/30/15	4/3/15	0%	Brian Lynch	Brian Lynch
969	3.1.1	1.5.1.7.3	Corporate metrics to Comision Delegada de Riesgos (CDR)	5d	4/6/15	4/10/15	0%	Brian Lynch	
970	3.1.1	1.5.1.7.3	Presentation of Corporate metrics to SHUSA BERC / Board for Approval	10d	4/13/15	4/24/15	0%	Brian Lynch	
971	3.1.1	1.5.1.7.3	Finalization of Local Metrics	5d	4/27/15	5/1/15	0%	Brian Lynch	
972	3.1.1	1.5.1.7.3	Local metric review with SHUSA EMC / ERM	5d	5/4/15	5/8/15	0%	Brian Lynch	
973	3.1.1	1.5.1.8.8	Local metric review with Pepe Corral / CDR	5d	5/11/15	5/15/15	0%	Brian Lynch	
974	3.1.1	1.5.1.8.9	Presentation of Local metrics to SHUSA BERC / Board for Approval	5d	5/18/15	5/22/15	0%	Brian Lynch	
975	<i>3.1.1</i>	<i>1.5.1.8.1</i>	<i>Milestone: SHUSA RTS Metrics Identified and Approved</i>	<i>0d</i>	<i>5/25/15</i>	<i>5/25/15</i>	<i>0%</i>	<i>Brian Lynch</i>	
976	<b>3.1.1</b>	<b>1.5.1.9</b>	<b>Develop process for dynamic review and updates of Risk Tolerance Statements and Risk Mandates</b>	<b>348d</b>	<b>10/1/14</b>	<b>1/31/16</b>	<b>30%</b>	<b>Brian Lynch</b>	<b>Brian Lynch</b>
977	3.1.1	1.5.1.9.1	Identify sources of identifying changes in risk profile (Risk ID/Assess., Stress Tests, Strategic Plans, etc.)	23d	10/1/14	10/31/14	100%	Brian Lynch	Brian Lynch
978	3.1.1	1.5.1.9.2	Develop and document process for obtaining information from identified sources	43d	11/3/14	12/31/14	100%	Brian Lynch	Brian Lynch
979	3.1.1	1.5.1.9.3	Develop and document process for assessing impact on Risk Tolerance - dependency on Risk ID Process	62d	4/1/15	6/25/15	0%	Brian Lynch	Brian Lynch
980	3.1.1	1.5.1.9.4	Develop and document process for recommending updates to Risk Tolerance to approving bodies	43d	4/1/15	5/29/15	0%	Brian Lynch	Brian Lynch
981	3.1.1	1.5.1.9.5	Develop and document process of updating reporting	45d	6/1/15	7/31/15	0%	Brian Lynch	Brian Lynch
982	<i>3.1.1</i>	<i>1.5.1.9.6</i>	<i>Milestone: RTS Dynamic Review and Updates Procedures complete</i>	<i>0d</i>	<i>8/3/15</i>	<i>8/3/15</i>	<i>0%</i>	<i>Brian Lynch</i>	<i>Brian Lynch</i>
983	<b>3.1.1</b>	<b>1.5.1.9.7</b>	<b>Review of underlying risk tolerance data</b>	<b>167d</b>	<b>11/10/14</b>	<b>6/30/15</b>	<b>60%</b>	<b>Brian Lynch</b>	
984	3.1.1	1.5.1.9.7	Conduct review of underlying data	100d	11/10/14	3/27/15	100%	Brian Lynch	Brian Lynch

ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
985	3.1.1	1.5.1.9.7	Identify areas for enhancement	20d	3/30/15	4/24/15	0%	Brian Lynch	Brian Lynch
986	3.1.1	1.5.1.9.7	Implement near-term enhancements to underlying data	47d	4/27/15	6/30/15	0%	Brian Lynch	Brian Lynch
987	<b>3.1.1</b>	<b>1.5.1.9.8</b>	<b>Review and enhance SHUSA risk tolerance development process</b>	<b>251d</b>	<b>1/1/15</b>	<b>12/18/15</b>	<b>9%</b>	<b>Brian Lynch</b>	
988	3.1.1	1.5.1.9.8	Review existing risk tolerance development process and identify weaknesses and areas for enhancement	64d	1/1/15	3/31/15	35%	Brian Lynch	Brian Lynch
989	3.1.1	1.5.1.9.8	Identify and socialize potential process enhancements and establish plan	66d	3/31/15	6/30/15	0%	Brian Lynch	Brian Lynch
990	3.1.1	1.5.1.9.8	Implement enhancements to the Risk Tolerance Framework	119d	6/30/15	12/11/15	0%	Brian Lynch	Brian Lynch
991	<i>3.1.1</i>	<i>1.5.1.9.8</i>	<i>Approve revised risk tolerance framework for implementation in 2016 risk tolerance statements</i>	<i>0d</i>	<i>12/18/15</i>	<i>12/18/15</i>	<i>0%</i>	<i>Brian Lynch</i>	<i>Brian Lynch</i>
992	<i>3.1.1</i>	<i>1.5.1.9.9</i>	<i>Adopt next iteration Risk Mandates</i>	<i>0d</i>	<i>1/31/16</i>	<i>1/31/16</i>	<i>0%</i>	<i>Brian Lynch</i>	<i>Brian Lynch</i>
993	<b>3.1.1</b>	<b>1.5.1.10</b>	<b>Incorporation of IHC entities into the SHUSA RTS</b>	<b>120d?</b>	<b>6/1/15</b>	<b>11/13/15</b>	<b>0%</b>	<b>Brian Lynch</b>	
994	3.1.1	1.5.1.10.	Draft strategy to incorporate IHC entities into the SHUSA RTS	20d	6/1/15	6/26/15	0%	Brian Lynch	
995	3.1.1	1.5.1.10.	Review strategy with head of ERM Architecture for feedback and approval	1d?	6/29/15	6/29/15	0%	Brian Lynch	
996	<b>3.1.1</b>	<b>1.5.1.10.</b>	<b>Limits, EWI and discussions with Risk Management Areas (RMAs)</b>	<b>45d</b>	<b>6/30/15</b>	<b>8/31/15</b>	<b>0%</b>	<b>Brian Lynch</b>	
997	3.1.1	1.5.1.10.	Credit Risk	24d	6/30/15	7/31/15	0%	Brian Lynch	
998	3.1.1	1.5.1.10.	Market Risk	24d	6/30/15	7/31/15	0%	Brian Lynch	
999	3.1.1	1.5.1.10.	Operational Risk	24d	6/30/15	7/31/15	0%	Brian Lynch	
1000	3.1.1	1.5.1.10.	Compliance Risk	24d	6/30/15	7/31/15	0%	Brian Lynch	
1001	3.1.1	1.5.1.10.	4R	24d	6/30/15	7/31/15	0%	Brian Lynch	
1002	3.1.1	1.5.1.10.	Model Risk	24d	6/30/15	7/31/15	0%	Brian Lynch	
1003	3.1.1	1.5.1.10.	Data Risk	24d	6/30/15	7/31/15	0%	Brian Lynch	
1004	3.1.1	1.5.1.10.	Chief Financial Officer	24d	6/30/15	7/31/15	0%	Brian Lynch	
1005	3.1.1	1.5.1.10.	Chief Risk Officer	24d	6/30/15	7/31/15	0%	Brian Lynch	
1006	3.1.1	1.5.1.10.	Chief Executive Officer	24d	6/30/15	7/31/15	0%	Brian Lynch	
1007	<i>3.1.1</i>	<i>1.5.1.10.</i>	<i>Milestone: Metrics identified</i>	<i>0d</i>	<i>7/31/15</i>	<i>7/31/15</i>	<i>0%</i>	<i>Brian Lynch</i>	
1008	3.1.1	1.5.1.10.	Calculate 2014 RTS core metric actual values	20d	8/3/15	8/28/15	0%	Brian Lynch	
1009	3.1.1	1.5.1.10.	Draft SHUSA IHC RTS 2016	10d	8/31/15	9/11/15	0%	Brian Lynch	

ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
1010	<b>3.1.1</b>	<b>1.5.1.10.</b>	<b>SHUSA RTS Submissions and Approvals</b>	<b>45d</b>	<b>9/14/15</b>	<b>11/13/15</b>	<b>0%</b>	<b>Brian Lynch</b>	
1011	3.1.1	1.5.1.10.	Receive sign off from SHUSA CRO on 2016 SHUSA IHC RTS	5d	9/14/15	9/18/15	0%	Brian Lynch	
1012	3.1.1	1.5.1.10.	Receive sign off from ERM C	10d	9/21/15	10/2/15	0%	Brian Lynch	
1013	3.1.1	1.5.1.10.	Receive sign off from CDR (Madrid)	10d	10/5/15	10/16/15	0%	Brian Lynch	
1014	3.1.1	1.5.1.10.	Receive sign off from BERC	10d	10/19/15	10/30/15	0%	Brian Lynch	
1015	3.1.1	1.5.1.10.	Receive sign off from SHUSA IHC Board - dependency on SHUSA IHC Board formation	10d	11/2/15	11/13/15	0%	Brian Lynch	
1016	<b>3.1.5</b>	<b>1.5.2</b>	<b>Puerto Rico (BSBC, BSPR, SIA, SS, SFS, SOB)</b>	<b>635d</b>	<b>9/23/13</b>	<b>2/29/16</b>	<b>57%</b>	<b>Juan Pablo Jurado</b>	
1017	<b>3.1.5</b>	<b>1.5.2.1</b>	<b>Methodology, Metrics and Limits</b>	<b>326d</b>	<b>5/1/14</b>	<b>7/30/15</b>	<b>86%</b>	<b>Juan Pablo Jurado</b>	
1018	<b>3.1.5</b>	<b>1.5.2.1.1</b>	<b>Definition of Metrics</b>	<b>326d</b>	<b>5/1/14</b>	<b>7/30/15</b>	<b>86%</b>	<b>Juan Pablo Jurado</b>	
1019	<b>3.1.5</b>	<b>1.5.2.1.1</b>	<b>Definition of the template and approach of the metrics description for all of the BSC</b>	<b>326d</b>	<b>5/1/14</b>	<b>7/30/15</b>	<b>86%</b>	<b>Juan Pablo Jurado</b>	
1020	3.1.5	1.5.2.1.1	Definition of Metrics for Santander Bancorp	43d	5/1/14	6/30/14	100%	Juan Pablo Jurado	
1021	3.1.5	1.5.2.1.1	Definition of Metrics for BSPR	43d	5/1/14	6/30/14	100%	Juan Pablo Jurado	
1022	3.1.5	1.5.2.1.1	Definition of Metrics for SSLLC	43d	5/1/14	6/30/14	100%	Juan Pablo Jurado	
1023	3.1.5	1.5.2.1.1	Definition of Metrics for Santander Financial	43d	5/1/14	6/30/14	100%	Juan Pablo Jurado	
1024	3.1.5	1.5.2.1.1	Definition of Metrics for Santander Overseas Bank	43d	5/1/14	6/30/14	100%	Juan Pablo Jurado	
1025	3.1.5	1.5.2.1.1	Discuss Metrics Methodology with SHUSA to confirm if additional metrics are required to monitor SHUSA IHC	34d	6/15/15	7/30/15	0%	Juan Pablo Jurado	
1026	<i>3.1.5</i>	<i>1.5.2.1.1</i>	<i>Milestone: Metrics Methodology Approved</i>	<i>0d</i>	<i>7/30/15</i>	<i>7/30/15</i>	<i>0%</i>	<i>Juan Pablo Jurado</i>	
1027	<b>3.1.5</b>	<b>1.5.2.1.2</b>	<b>Limits and Tolerances Rationale</b>	<b>326d</b>	<b>5/1/14</b>	<b>7/30/15</b>	<b>86%</b>	<b>Juan Pablo Jurado</b>	
1028	<b>3.1.5</b>	<b>1.5.2.1.2</b>	<b>Methodology to define early warning level for all of the indicator of the BSC</b>	<b>326d</b>	<b>5/1/14</b>	<b>7/30/15</b>	<b>86%</b>	<b>Juan Pablo Jurado</b>	
1029	3.1.5	1.5.2.1.2	Limits and Tolerances for Santander Bancorp	43d	5/1/14	6/30/14	100%	Juan Pablo Jurado	
1030	3.1.5	1.5.2.1.2	Limits and Tolerances for BSPR	43d	5/1/14	6/30/14	100%	Juan Pablo Jurado	
1031	3.1.5	1.5.2.1.2	Limits and Tolerances for SSLLC	43d	5/1/14	6/30/14	100%	Juan Pablo Jurado	
1032	3.1.5	1.5.2.1.2	Limits and Tolerances for Santander Financial	43d	5/1/14	6/30/14	100%	Juan Pablo Jurado	

ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
1033	3.1.5	1.5.2.1.2	Limits and Tolerances for Santander Overseas Bank	43d	5/1/14	6/30/14	100%	Juan Pablo Jurado	
1034	3.1.5	1.5.2.1.2	Discuss Limits and Tolerance Rationale with SHUSA to confirm if limits and tolerance are inline with monitoring SHUSA IHC	34d	6/15/15	7/30/15	0%	Juan Pablo Jurado	
1035	3.1.5	1.5.2.1.2	Milestone: Metrics Methodology Approved	0d	7/30/15	7/30/15	0%	Juan Pablo Jurado	
1036	3.1.5	1.5.2.2	Risk Tolerance Statement	477d	5/1/14	2/29/16	41%	Juan Pablo Jurado	
1037	3.1.5	1.5.2.2.1	Review of the Current Definition of the Risk Tolerance: Objective and Use - Santander Bancorp	437d	5/1/14	1/1/16	31%	Juan Pablo Jurado	
1038	3.1.5	1.5.2.2.1	Definition of Risk Tolerance	337d	5/1/14	8/14/15	35%	Juan Pablo Jurado	
1039	3.1.5	1.5.2.2.1	Definition of Risk Tolerance (v. 1)	43d	5/1/14	6/30/14	100%	Juan Pablo Jurado	
1040	3.1.5	1.5.2.2.1	Definition of Risk Tolerance (v. 2)	45d	6/15/15	8/14/15	0%	Juan Pablo Jurado	
1041	3.1.5	1.5.2.2.1	Identify Risk Tolerance gaps with SHUSA Framework	34d	6/15/15	7/30/15	0%	Juan Pablo Jurado	
1042	3.1.5	1.5.2.2.1	Principles of Metrics	337d	5/1/14	8/14/15	49%	Juan Pablo Jurado	
1043	3.1.5	1.5.2.2.1	Principles of Metrics (v. 1)	43d	5/1/14	6/30/14	100%	Juan Pablo Jurado	
1044	3.1.5	1.5.2.2.1	Principles of Metrics (v. 2)	45d	6/15/15	8/14/15	0%	Juan Pablo Jurado	
1045	3.1.5	1.5.2.2.1	Kind of Metrics: Quantitatives and Qualitatives - Prudential and Non Prudential	337d	5/1/14	8/14/15	49%	Juan Pablo Jurado	
1046	3.1.5	1.5.2.2.1	Kind of Metrics: Quantitatives and Qualitatives - Prudential and Non Prudential (v.1)	43d	5/1/14	6/30/14	100%	Juan Pablo Jurado	
1047	3.1.5	1.5.2.2.1	Kind of Metrics: Quantitatives and Qualitatives - Prudential and Non Prudential (v.2)	45d	6/15/15	8/14/15	0%	Juan Pablo Jurado	
1048	3.1.5	1.5.2.2.1	Linking Risk Tolerance with Management Limits	337d	5/1/14	8/14/15	35%	Juan Pablo Jurado	
1049	3.1.5	1.5.2.2.1	Linking Risk Tolerance with Management Limits (v. 1)	43d	5/1/14	6/30/14	100%	Juan Pablo Jurado	
1050	3.1.5	1.5.2.2.1	Linking Risk Tolerance with Management Limits (v. 2)	45d	6/15/15	8/14/15	0%	Juan Pablo Jurado	
1051	3.1.5	1.5.2.2.1	Discuss SBC Risk management limits with SHUSA to confirm if additional limits are required to monitor SHUSA IHC	34d	6/15/15	7/30/15	0%	Juan Pablo Jurado	
1052	3.1.5	1.5.2.2.1	Identify process to enhance and establish a project plan for dynamic review and update to RTS / BSC	34d	6/15/15	7/30/15	0%	Juan Pablo Jurado	
1053	3.1.5	1.5.2.2.1	Execute project plan for dynamic review and update to RTS / BSC	110d	8/3/15	1/1/16	0%	Juan Pablo Jurado	



ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
1054	3.1.5	1.5.2.2.1	Based on the Risk Scorecards already being created in Puerto Rico, determine if Risk Mandates are required	23d	3/2/15	4/1/15	100%	Juan Pablo Jurado	
1055	3.1.5	1.5.2.2.1	Develop Risk Mandates per line of business	50d	9/1/15	11/9/15	0%	Juan Pablo Jurado	
1056	<b>3.1.5</b>	<b>1.5.2.2.2</b>	<b>Review of the Current Definition of the Risk Tolerance: Objective and Use - Santander Financial Services</b>	<b>436d</b>	<b>5/1/14</b>	<b>12/31/15</b>	<b>30%</b>	<b>Juan Pablo Jurado</b>	
1057	<b>3.1.5</b>	<b>1.5.2.2.2</b>	<b>Definition of Risk Tolerance</b>	<b>337d</b>	<b>5/1/14</b>	<b>8/14/15</b>	<b>35%</b>	<b>Juan Pablo Jurado</b>	
1058	3.1.5	1.5.2.2.2	Definition of Risk Tolerance (v. 1)	43d	5/1/14	6/30/14	100%	Juan Pablo Jurado	
1059	3.1.5	1.5.2.2.2	Definition of Risk Tolerance (v. 2)	45d	6/15/15	8/14/15	0%	Juan Pablo Jurado	
1060	3.1.5	1.5.2.2.2	Identify Risk Tolerance gaps with SHUSA Framework	34d	6/15/15	7/30/15	0%	Juan Pablo Jurado	
1061	<b>3.1.5</b>	<b>1.5.2.2.2</b>	<b>Principles of Metrics</b>	<b>337d</b>	<b>5/1/14</b>	<b>8/14/15</b>	<b>49%</b>	<b>Juan Pablo Jurado</b>	
1062	3.1.5	1.5.2.2.2	Principles of Metrics (v. 1)	43d	5/1/14	6/30/14	100%	Juan Pablo Jurado	
1063	3.1.5	1.5.2.2.2	Principles of Metrics (v. 2)	45d	6/15/15	8/14/15	0%	Juan Pablo Jurado	
1064	<b>3.1.5</b>	<b>1.5.2.2.2</b>	<b>Kind of Metrics: Quantitatives and Qualitatives - Prudential and Non Prudential</b>	<b>337d</b>	<b>5/1/14</b>	<b>8/14/15</b>	<b>49%</b>	<b>Juan Pablo Jurado</b>	
1065	3.1.5	1.5.2.2.2	Kind of Metrics: Quantitatives and Qualitatives - Prudential and Non Prudential (v.1)	43d	5/1/14	6/30/14	100%	Juan Pablo Jurado	
1066	3.1.5	1.5.2.2.2	Kind of Metrics: Quantitatives and Qualitatives - Prudential and Non Prudential (v.2)	45d	6/15/15	8/14/15	0%	Juan Pablo Jurado	
1067	<b>3.1.5</b>	<b>1.5.2.2.2</b>	<b>Linking Risk Tolerance with Management Limits</b>	<b>337d</b>	<b>5/1/14</b>	<b>8/14/15</b>	<b>35%</b>	<b>Juan Pablo Jurado</b>	
1068	3.1.5	1.5.2.2.2	Linking Risk Tolerance with Management Limits (v. 1)	43d	5/1/14	6/30/14	100%	Juan Pablo Jurado	
1069	3.1.5	1.5.2.2.2	Linking Risk Tolerance with Management Limits (v. 2)	45d	6/15/15	8/14/15	0%	Juan Pablo Jurado	
1070	3.1.5	1.5.2.2.2	Discuss SFS Risk management limits with SHUSA to confirm if additional limits are required to monitor SHUSA IHC	34d	6/15/15	7/30/15	0%	Juan Pablo Jurado	
1071	3.1.5	1.5.2.2.2	Identify process to enhance and establish a project plan for dynamic review and update to RTS / BSC	34d	6/15/15	7/30/15	0%	Juan Pablo Jurado	
1072	3.1.5	1.5.2.2.2	Execute project plan for dynamic review and update to RTS / BSC	109d	8/3/15	12/31/15	0%	Juan Pablo Jurado	
1073	3.1.5	1.5.2.2.2	Based on the Risk Scorecards already being created in Puerto Rico, determine if Risk Mandates are required	20d	3/2/15	3/27/15	100%	Juan Pablo Jurado	
1074	3.1.5	1.5.2.2.2	Develop Risk Mandates per line of business	49d	9/2/15	11/9/15	0%		
1075	<b>3.1.5</b>	<b>1.5.2.2.3</b>	<b>Review of the Current Definition of the Risk Tolerance: Objective and Use - Santander Overseas Bank</b>	<b>437d</b>	<b>5/1/14</b>	<b>1/1/16</b>	<b>34%</b>	<b>Juan Pablo Jurado</b>	
1076	<b>3.1.5</b>	<b>1.5.2.2.3</b>	<b>Definition of Risk Tolerance</b>	<b>326d</b>	<b>5/1/14</b>	<b>7/30/15</b>	<b>39%</b>	<b>Juan Pablo Jurado</b>	

ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
1077	3.1.5	1.5.2.2.3	Definition of Risk Tolerance (v. 1)	43d	5/1/14	6/30/14	100%	Juan Pablo Jurado	
1078	3.1.5	1.5.2.2.3	Definition of Risk Tolerance (v. 2)	34d	6/15/15	7/30/15	0%	Juan Pablo Jurado	
1079	3.1.5	1.5.2.2.3	Identify Risk Tolerance gaps with SHUSA Framework	34d	6/15/15	7/30/15	0%	Juan Pablo Jurado	
1080	<b>3.1.5</b>	<b>1.5.2.2.3</b>	<b>Principles of Metrics</b>	<b>337d</b>	<b>5/1/14</b>	<b>8/14/15</b>	<b>49%</b>	<b>Juan Pablo Jurado</b>	
1081	3.1.5	1.5.2.2.3	Principles of Metrics (v. 1)	43d	5/1/14	6/30/14	100%	Juan Pablo Jurado	
1082	3.1.5	1.5.2.2.3	Principles of Metrics (v. 2)	45d	6/15/15	8/14/15	0%	Juan Pablo Jurado	
1083	<b>3.1.5</b>	<b>1.5.2.2.3</b>	<b>Kind of Metrics: Quantitatives and Qualitatives - Prudential and Non Prudential</b>	<b>337d</b>	<b>5/1/14</b>	<b>8/14/15</b>	<b>49%</b>	<b>Juan Pablo Jurado</b>	
1084	3.1.5	1.5.2.2.3	Kind of Metrics: Quantitatives and Qualitatives - Prudential and Non Prudential (v.1)	43d	5/1/14	6/30/14	100%	Juan Pablo Jurado	
1085	3.1.5	1.5.2.2.3	Kind of Metrics: Quantitatives and Qualitatives - Prudential and Non Prudential (v.2)	45d	6/15/15	8/14/15	0%	Juan Pablo Jurado	
1086	<b>3.1.5</b>	<b>1.5.2.2.3</b>	<b>Linking Risk Tolerance with Management Limits</b>	<b>337d</b>	<b>5/1/14</b>	<b>8/14/15</b>	<b>35%</b>	<b>Juan Pablo Jurado</b>	
1087	3.1.5	1.5.2.2.3	Linking Risk Tolerance with Management Limits (v. 1)	43d	5/1/14	6/30/14	100%	Juan Pablo Jurado	
1088	3.1.5	1.5.2.2.3	Linking Risk Tolerance with Management Limits (v. 2)	45d	6/15/15	8/14/15	0%	Juan Pablo Jurado	
1089	3.1.5	1.5.2.2.3	Discuss SOB Risk management limits with SHUSA to confirm if additional limits are required to monitor SHUSA IHC	34d	6/15/15	7/30/15	0%	Juan Pablo Jurado	
1090	3.1.5	1.5.2.2.3	Identify process to enhance and establish a project plan for dynamic review and update to RTS / BSC	34d	6/15/15	7/30/15	0%	Juan Pablo Jurado	
1091	3.1.5	1.5.2.2.3	Execute project plan for dynamic review and update to RTS / BSC	110d	8/3/15	1/1/16	0%	Juan Pablo Jurado	
1092	3.1.5	1.5.2.2.3	Based on the Risk Scorecards already being created in Puerto Rico, determine if Risk Mandates are required	23d	3/2/15	4/1/15	100%	Juan Pablo Jurado	
1093	<i>3.1.5</i>	<i>1.5.2.2.3</i>	<i>Milestone: Risk Mandates for SBC created</i>	<i>0d</i>	<i>9/1/15</i>	<i>9/1/15</i>	<i>0%</i>	<i>Juan Pablo Jurado</i>	
1094	<i>3.1.5</i>	<i>1.5.2.2.3</i>	<i>Milestone: Risk Mandates for SFS created</i>	<i>0d</i>	<i>9/1/15</i>	<i>9/1/15</i>	<i>0%</i>	<i>Juan Pablo Jurado</i>	
1095	<b>3.1.5</b>	<b>1.5.2.2.4</b>	<b>Corporate Framework Risk Tolerance - Santander Bancorp</b>	<b>327d</b>	<b>5/1/14</b>	<b>7/31/15</b>	<b>88%</b>	<b>Juan Pablo Jurado</b>	
1096	3.1.5	1.5.2.2.4	Procedure development and approval of Risk Tolerance	43d	5/1/14	6/30/14	100%	Juan Pablo Jurado	
1097	3.1.5	1.5.2.2.4	Contrast with business plans Risk Tolerance	43d	5/1/14	6/30/14	100%	Juan Pablo Jurado	

ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
1098	3.1.5	1.5.2.2.4	Monitoring Risk Tolerance	43d	5/1/14	6/30/14	100%	Juan Pablo Jurado	
1099	3.1.5	1.5.2.2.4	Scenarios of Risk Tolerance	43d	5/1/14	6/30/14	100%	Juan Pablo Jurado	
1100	3.1.5	1.5.2.2.4	Risk Tolerance Framework review and presentation for approval at BOD	23d	7/1/15	7/31/15	0%	Juan Pablo Jurado	
1101	3.1.5	1.5.2.2.4	Milestone: Risk Tolerance Framework Implemented	0d	7/31/15	7/31/15	0%	Juan Pablo Jurado	
1102	3.1.5	1.5.2.2.5	Corporate Framework Risk Tolerance - Santander Financial Services	327d	5/1/14	7/31/15	88%	Juan Pablo Jurado	
1103	3.1.5	1.5.2.2.5	Procedure development and approval of Risk Tolerance	43d	5/1/14	6/30/14	100%	Juan Pablo Jurado	
1104	3.1.5	1.5.2.2.5	Contrast with business plans Risk Tolerance	43d	5/1/14	6/30/14	100%	Juan Pablo Jurado	
1105	3.1.5	1.5.2.2.5	Monitoring Risk Tolerance	43d	5/1/14	6/30/14	100%	Juan Pablo Jurado	
1106	3.1.5	1.5.2.2.5	Scenarios of Risk Tolerance	43d	5/1/14	6/30/14	100%	Juan Pablo Jurado	
1107	3.1.5	1.5.2.2.5	Risk Tolerance Framework review and presentation for approval at BOD	23d	7/1/15	7/31/15	0%	Juan Pablo Jurado	
1108	3.1.5	1.5.2.2.5	Milestone: Risk Tolerance Framework Implemented	0d	7/31/15	7/31/15	0%	Juan Pablo Jurado	
1109	3.1.5	1.5.2.2.6	Corporate Framework Risk Tolerance - Santander Overseas Bank	327d	5/1/14	7/31/15	88%	Juan Pablo Jurado	
1110	3.1.5	1.5.2.2.6	Procedure development and approval of Risk Tolerance	43d	5/1/14	6/30/14	100%	Juan Pablo Jurado	
1111	3.1.5	1.5.2.2.6	Contrast with business plans Risk Tolerance	43d	5/1/14	6/30/14	100%	Juan Pablo Jurado	
1112	3.1.5	1.5.2.2.6	Monitoring Risk Tolerance	43d	5/1/14	6/30/14	100%	Juan Pablo Jurado	
1113	3.1.5	1.5.2.2.6	Scenarios of Risk Tolerance	43d	5/1/14	6/30/14	100%	Juan Pablo Jurado	
1114	3.1.5	1.5.2.2.6	Risk Tolerance Framework review and presentation for approval at BOD	23d	7/1/15	7/31/15	0%	Juan Pablo Jurado	
1115	3.1.5	1.5.2.2.6	Milestone: Risk Tolerance Framework Implemented	0d	7/31/15	7/31/15	0%	Juan Pablo Jurado	
1116	3.1.5	1.5.2.2.7	Present to BOD the corrected Risk Tolerance Statements for the indicators where there have been changes - Santander Bancorp	43d	1/30/15	3/31/15	100%	Juan Pablo Jurado	
1117	3.1.5	1.5.2.2.8	Present to BOD the corrected Risk Tolerance Statements for the indicators where there have been changes - Santander Financial Services	43d	1/30/15	3/31/15	100%	Juan Pablo Jurado	

ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
1118	3.1.5	1.5.2.2.9	Present to BOD the corrected Risk Tolerance Statements for the indicators where there have been changes - Santander Overseas Bank	43d	1/30/15	3/31/15	100%	Juan Pablo Jurado	
1119	<b>3.1.5</b>	<b>1.5.2.2.1</b>	<b>Establish Enterprise Risk infrastructure for Puerto Rico IHC entities to support Risk Tolerance process (2016)</b>	<b>110d</b>	<b>9/28/15</b>	<b>2/29/16</b>	<b>0%</b>	<b>Juan Pablo Jurado</b>	
1120	<b>3.1.5</b>	<b>1.5.2.2.1</b>	<b>Santander Bancorp</b>	<b>110d</b>	<b>9/28/15</b>	<b>2/29/16</b>	<b>0%</b>	<b>Juan Pablo Jurado</b>	
1121	<b>3.1.5</b>	<b>1.5.2.2.1</b>	<b>Update Risk Tolerance Framework for IHC</b>	<b>110d</b>	<b>9/28/15</b>	<b>2/26/16</b>	<b>0%</b>	<b>Juan Pablo Jurado</b>	
1122	3.1.5	1.5.2.2.1	Review SHUSA Risk Tolerance Framework	10d	9/28/15	10/9/15	0%	Juan Pablo Jurado	
1123	3.1.5	1.5.2.2.1	Provide feedback to SHUSA Risk Tolerance Framework	10d	10/12/15	10/23/15	0%	Juan Pablo Jurado	
1124	3.1.5	1.5.2.2.1	Adopt and approve SHUSA Risk Tolerance Framework at BERC and BOD	20d	2/1/16	2/26/16	0%	Juan Pablo Jurado	
1125	<b>3.1.5</b>	<b>1.5.2.2.1</b>	<b>Establish Risk Tolerance Procedure</b>	<b>40d</b>	<b>1/4/16</b>	<b>2/26/16</b>	<b>0%</b>	<b>Juan Pablo Jurado</b>	
1126	3.1.5	1.5.2.2.1	Establish Risk Mandate Procedure	20d	1/4/16	1/29/16	0%	Juan Pablo Jurado	
1127	3.1.5	1.5.2.2.1	Establish Risk tolerance reporting monitoring and escalation process	40d	1/4/16	2/26/16	0%	Juan Pablo Jurado	
1128	3.1.5	1.5.2.2.1	Review Risk Tolerance Reporting Monitoring and Esclation Process Documentation	10d	1/4/16	1/15/16	0%	Juan Pablo Jurado	
1129	3.1.5	1.5.2.2.1	Implement SHUSA Risk Tolerance Reporting Monitoring and Escalation Process	30d	1/18/16	2/26/16	0%	Juan Pablo Jurado	
1130	<i>3.1.5</i>	<i>1.5.2.2.1</i>	<i>Milestone: 2016 RTS Process Designed</i>	<i>0d</i>	<i>2/29/16</i>	<i>2/29/16</i>	<i>0%</i>	<i>Juan Pablo Jurado</i>	
1131	<b>3.1.5</b>	<b>1.5.2.2.1</b>	<b>Santander Overseas Bank</b>	<b>110d</b>	<b>9/28/15</b>	<b>2/29/16</b>	<b>0%</b>	<b>Juan Pablo Jurado</b>	
1132	<b>3.1.5</b>	<b>1.5.2.2.1</b>	<b>Update Risk Tolerance Framework for IHC</b>	<b>110d</b>	<b>9/28/15</b>	<b>2/26/16</b>	<b>0%</b>	<b>Juan Pablo Jurado</b>	
1133	3.1.5	1.5.2.2.1	Review SHUSA Risk Tolerance Framework	10d	9/28/15	10/9/15	0%	Juan Pablo Jurado	
1134	3.1.5	1.5.2.2.1	Provide feedback to SHUSA Risk Tolerance Framework	10d	10/12/15	10/23/15	0%	Juan Pablo Jurado	

ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
1135	3.1.5	1.5.2.2.1	Adopt and approve SHUSA Risk Tolerance Framework at BERC and BOD	20d	2/1/16	2/26/16	0%	Juan Pablo Jurado	
1136	3.1.5	1.5.2.2.1	Establish Risk Tolerance Procedure	40d	1/4/16	2/26/16	0%	Juan Pablo Jurado	
1137	3.1.5	1.5.2.2.1	Establish Risk Mandate Procedure	20d	1/4/16	1/29/16	0%	Juan Pablo Jurado	
1138	3.1.5	1.5.2.2.1	Establish Risk tolerance reporting monitoring and escalation process	40d	1/4/16	2/26/16	0%	Juan Pablo Jurado	
1139	3.1.5	1.5.2.2.1	Review Risk Tolerance Reporting Monitoring and Esclation Process Documentation	10d	1/4/16	1/15/16	0%	Juan Pablo Jurado	
1140	3.1.5	1.5.2.2.1	Implement SHUSA Risk Tolerance Reporting Monitoring and Escalation Process	30d	1/18/16	2/26/16	0%	Juan Pablo Jurado	
1141	3.1.5	1.5.2.2.1	Milestone: 2016 RTS Process Designed	0d	2/29/16	2/29/16	0%	Juan Pablo Jurado	
1142	3.1.5	1.5.2.2.1	Santander Financial Services	110d	9/28/15	2/29/16	0%	Juan Pablo Jurado	
1143	3.1.5	1.5.2.2.1	Update Risk Tolerance Framework for IHC	110d	9/28/15	2/26/16	0%	Juan Pablo Jurado	
1144	3.1.5	1.5.2.2.1	Review SHUSA Risk Tolerance Framework	10d	9/28/15	10/9/15	0%	Juan Pablo Jurado	
1145	3.1.5	1.5.2.2.1	Provide feedback to SHUSA Risk Tolerance Framework	10d	10/12/15	10/23/15	0%	Juan Pablo Jurado	
1146	3.1.5	1.5.2.2.1	Adopt and approve SHUSA Risk Tolerance Framework at BERC and BOD	20d	2/1/16	2/26/16	0%	Juan Pablo Jurado	
1147	3.1.5	1.5.2.2.1	Establish Risk Tolerance Procedure	40d	1/4/16	2/26/16	0%	Juan Pablo Jurado	
1148	3.1.5	1.5.2.2.1	Establish Risk Mandate Procedure	20d	1/4/16	1/29/16	0%	Juan Pablo Jurado	
1149	3.1.5	1.5.2.2.1	Establish Risk tolerance reporting monitoring and escalation process	40d	1/4/16	2/26/16	0%	Juan Pablo Jurado	
1150	3.1.5	1.5.2.2.1	Review Risk Tolerance Reporting Monitoring and Esclation Process Documentation	10d	1/4/16	1/15/16	0%	Juan Pablo Jurado	
1151	3.1.5	1.5.2.2.1	Implement SHUSA Risk Tolerance Reporting Monitoring and Escalation Process	30d	1/18/16	2/26/16	0%	Juan Pablo Jurado	
1152	3.1.5	1.5.2.2.1	Milestone: 2016 RTS Process Designed	0d	2/29/16	2/29/16	0%	Juan Pablo Jurado	

ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
1153	3.1.5	1.5.2.3	Scorecards All Entities and Line Of Business	594d	9/23/13	12/31/15	73%	Juan Pablo Jurado	
1154	3.1.5	1.5.2.3.1	BSC Gap Analysis SHUSA Indicators - complementary metrics	107d	11/1/13	3/31/14	100%	Juan Pablo Jurado	
1155	3.1.5	1.5.2.3.1	Perform Process GAP analysis	43d	11/1/13	12/31/13	100%	Juan Pablo Jurado	
1156	3.1.5	1.5.2.3.1	Develop plans to close any Process Gaps	43d	1/30/14	3/31/14	100%	Juan Pablo Jurado	
1157	3.1.5	1.5.2.3.1	Define processes for each Gap Area	43d	1/30/14	3/31/14	100%	Juan Pablo Jurado	
1158	3.1.5	1.5.2.3.2	BSC Gap Analysis FED Indicators	107d	11/1/13	3/31/14	100%	Juan Pablo Jurado	
1159	3.1.5	1.5.2.3.2	Perform Process GAP analysis	43d	11/1/13	12/31/13	100%	Juan Pablo Jurado	
1160	3.1.5	1.5.2.3.2	Develop plans to close any Process Gaps	43d	1/30/14	3/31/14	100%	Juan Pablo Jurado	
1161	3.1.5	1.5.2.3.2	Define processes for each Gap Area	43d	1/30/14	3/31/14	100%	Juan Pablo Jurado	
1162	3.1.5	1.5.2.3.3	Perform Process GAP analysis against Risk Framework & Governance Structure	43d	5/1/14	6/30/14	100%	Juan Pablo Jurado	
1163	3.1.5	1.5.2.3.4	Develop plans to close any Process Gaps	43d	5/1/14	6/30/14	100%	Juan Pablo Jurado	
1164	3.1.5	1.5.2.3.5	Define processes for each Gap Area	43d	5/1/14	6/30/14	100%	Juan Pablo Jurado	
1165	3.1.5	1.5.2.3.6	BSC Santander BanCorp	594d	9/23/13	12/31/15	67%	Juan Pablo Jurado	
1166	3.1.5	1.5.2.3.6	BSC Santander BanCorp (v. 1)	45d	9/23/13	11/22/13	100%	Juan Pablo Jurado	
1167	3.1.5	1.5.2.3.6	BSC Santander BanCorp (v. 2)	44d	7/2/14	8/31/14	100%	Juan Pablo Jurado	
1168	3.1.5	1.5.2.3.6	BSC Santander BanCorp (v. 3)	43d	7/2/15	8/31/15	0%	Juan Pablo Jurado	
1169	3.1.5	1.5.2.3.6	BSC BSPR	594d	9/23/13	12/31/15	66%	Juan Pablo Jurado	
1170	3.1.5	1.5.2.3.6	BSC BSPR (v. 1)	45d	9/23/13	11/22/13	100%	Juan Pablo Jurado	
1171	3.1.5	1.5.2.3.6	BSC BSPR (v. 2)	44d	7/2/14	8/31/14	100%	Juan Pablo Jurado	
1172	3.1.5	1.5.2.3.6	BSC BSPR (v. 3)	43d	7/2/15	8/31/15	0%	Juan Pablo Jurado	
1173	3.1.5	1.5.2.3.6	BSC Santander Insurance Agency	506d	9/23/13	8/31/15	75%	Juan Pablo Jurado	



ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
1174	3.1.5	1.5.2.3.6	BSC SIA (v. 1)	45d	9/23/13	11/22/13	100%	Juan Pablo Jurado	
1175	3.1.5	1.5.2.3.6	BSC SIA (v. 2)	44d	7/1/15	8/31/15	50%	Juan Pablo Jurado	
1176	<b>3.1.5</b>	<b>1.5.2.3.6</b>	<b>BSC Mortgage</b>	<b>506d</b>	<b>9/23/13</b>	<b>8/31/15</b>	<b>51%</b>	<b>Juan Pablo Jurado</b>	
1177	3.1.5	1.5.2.3.6	BSC Mortgage (v. 1)	45d	9/23/13	11/22/13	100%	Juan Pablo Jurado	
1178	3.1.5	1.5.2.3.6	BSC Mortgage (v. 2)	44d	7/1/15	8/31/15	0%	Juan Pablo Jurado	
1179	<b>3.1.5</b>	<b>1.5.2.3.6</b>	<b>BSC Financial Management</b>	<b>506d</b>	<b>9/23/13</b>	<b>8/31/15</b>	<b>75%</b>	<b>Juan Pablo Jurado</b>	
1180	3.1.5	1.5.2.3.6	BSC Financial Management (v. 1)	45d	9/23/13	11/22/13	100%	Juan Pablo Jurado	
1181	3.1.5	1.5.2.3.6	BSC Financial Management (v. 2)	44d	7/1/15	8/31/15	50%	Juan Pablo Jurado	
1182	<b>3.1.5</b>	<b>1.5.2.3.6</b>	<b>BSC Personal Loans</b>	<b>506d</b>	<b>9/23/13</b>	<b>8/31/15</b>	<b>75%</b>	<b>Juan Pablo Jurado</b>	
1183	3.1.5	1.5.2.3.6	BSC Personal Loans (v. 1)	45d	9/23/13	11/22/13	100%	Juan Pablo Jurado	
1184	3.1.5	1.5.2.3.6	BSC Personal Loans (v. 2)	44d	7/1/15	8/31/15	50%	Juan Pablo Jurado	
1185	<b>3.1.5</b>	<b>1.5.2.3.6</b>	<b>BSC Small Business Banking</b>	<b>506d</b>	<b>9/23/13</b>	<b>8/31/15</b>	<b>75%</b>	<b>Juan Pablo Jurado</b>	
1186	3.1.5	1.5.2.3.6	BSC Small Business Banking (v. 1)	45d	9/23/13	11/22/13	100%	Juan Pablo Jurado	
1187	3.1.5	1.5.2.3.6	BSC Small Business Banking (v. 2)	44d	7/1/15	8/31/15	50%	Juan Pablo Jurado	
1188	<b>3.1.5</b>	<b>1.5.2.3.6</b>	<b>BSC Credit Cards</b>	<b>506d</b>	<b>9/23/13</b>	<b>8/31/15</b>	<b>75%</b>	<b>Juan Pablo Jurado</b>	
1189	3.1.5	1.5.2.3.6	BSC Credit Cards (v. 1)	45d	9/23/13	11/22/13	100%	Juan Pablo Jurado	
1190	3.1.5	1.5.2.3.6	BSC Credit Cards (v. 2)	44d	7/1/15	8/31/15	50%	Juan Pablo Jurado	
1191	<b>3.1.5</b>	<b>1.5.2.3.6</b>	<b>BSC Institutional Banking / Public Sector</b>	<b>506d</b>	<b>9/23/13</b>	<b>8/31/15</b>	<b>75%</b>	<b>Juan Pablo Jurado</b>	
1192	3.1.5	1.5.2.3.6	BSC Institutional Banking / Public Sector (v. 1)	45d	9/23/13	11/22/13	100%	Juan Pablo Jurado	
1193	3.1.5	1.5.2.3.6	BSC Institutional Banking / Public Sector (v. 2)	44d	7/1/15	8/31/15	50%	Juan Pablo Jurado	

ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
1194	<b>3.1.5</b>	<b>1.5.2.3.6</b>	<b>BSC Enterprise &amp; GBM</b>	<b>506d</b>	<b>9/23/13</b>	<b>8/31/15</b>	<b>75%</b>	<b>Juan Pablo Jurado</b>	
1195	3.1.5	1.5.2.3.6	BSC Enterprise & GBM (v. 1)	45d	9/23/13	11/22/13	100%	Juan Pablo Jurado	
1196	3.1.5	1.5.2.3.6	BSC Enterprise & GBM (v. 2)	44d	7/1/15	8/31/15	50%	Juan Pablo Jurado	
1197	<b>3.1.5</b>	<b>1.5.2.3.6</b>	<b>BSC REO</b>	<b>506d</b>	<b>9/23/13</b>	<b>8/31/15</b>	<b>75%</b>	<b>Juan Pablo Jurado</b>	
1198	3.1.5	1.5.2.3.6	BSC REO (v. 1)	45d	9/23/13	11/22/13	100%	Juan Pablo Jurado	
1199	3.1.5	1.5.2.3.6	BSC REO (v. 2)	44d	7/1/15	8/31/15	50%	Juan Pablo Jurado	
1200	<b>3.1.5</b>	<b>1.5.2.3.6</b>	<b>BSC Santander Securities LLC</b>	<b>506d</b>	<b>9/23/13</b>	<b>8/31/15</b>	<b>67%</b>	<b>Juan Pablo Jurado</b>	
1201	3.1.5	1.5.2.3.6	BSC SLLC (v. 1)	45d	9/23/13	11/22/13	100%	Juan Pablo Jurado	
1202	3.1.5	1.5.2.3.6	BSC SLLC (v. 2)	44d	7/2/14	8/31/14	100%	Juan Pablo Jurado	
1203	3.1.5	1.5.2.3.6	BSC SLLC (v. 3)	43d	7/2/15	8/31/15	0%	Juan Pablo Jurado	
1204	<b>3.1.5</b>	<b>1.5.2.3.6</b>	<b>BSC Trust</b>	<b>45d</b>	<b>11/1/15</b>	<b>12/31/15</b>	<b>0%</b>	<b>Juan Pablo Jurado</b>	
1205	3.1.5	1.5.2.3.6	Development of BSC Trust	45d	11/1/15	12/31/15	0%	Juan Pablo Jurado	
1206	<b>3.1.5</b>	<b>1.5.2.3.6</b>	<b>BSC Pension Plan</b>	<b>45d</b>	<b>11/1/15</b>	<b>12/31/15</b>	<b>0%</b>	<b>Juan Pablo Jurado</b>	
1207	3.1.5	1.5.2.3.6	Development of BSC Pension Plan	45d	11/1/15	12/31/15	0%	Juan Pablo Jurado	
1208	<b>3.1.5</b>	<b>1.5.2.3.6</b>	<b>BSC Santander Financial Services</b>	<b>506d</b>	<b>9/23/13</b>	<b>8/31/15</b>	<b>80%</b>	<b>Juan Pablo Jurado</b>	
1209	3.1.5	1.5.2.3.6	BSC SFS (v. 1)	44d	7/2/14	8/31/14	100%	Juan Pablo Jurado	
1210	<b>3.1.5</b>	<b>1.5.2.3.6</b>	<b>BSC Island Finance</b>	<b>506d</b>	<b>9/23/13</b>	<b>8/31/15</b>	<b>75%</b>	<b>Juan Pablo Jurado</b>	
1211	3.1.5	1.5.2.3.6	BSC Island Finance (v. 1)	45d	9/23/13	11/22/13	100%	Juan Pablo Jurado	
1212	3.1.5	1.5.2.3.6	BSC Island Finance (v. 2)	44d	7/1/15	8/31/15	50%	Juan Pablo Jurado	

ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
1213	<b>3.1.5</b>	<b>1.5.2.3.6</b>	<b>BSC Special Assets</b>	<b>506d</b>	<b>9/23/13</b>	<b>8/31/15</b>	<b>75%</b>	<b>Juan Pablo Jurado</b>	
1214	3.1.5	1.5.2.3.6	BSC Special Assets (v. 1)	45d	9/23/13	11/22/13	100%	Juan Pablo Jurado	
1215	3.1.5	1.5.2.3.6	BSC Special Assets(v. 2)	44d	7/1/15	8/31/15	50%	Juan Pablo Jurado	
1216	<b>3.1.5</b>	<b>1.5.2.3.6</b>	<b>BSC Santander Overseas Bank</b>	<b>304d</b>	<b>7/2/14</b>	<b>8/31/15</b>	<b>51%</b>	<b>Juan Pablo Jurado</b>	
1217	3.1.5	1.5.2.3.6	BSC Santander Overseas Bank (v. 1)	44d	7/2/14	8/31/14	100%	Juan Pablo Jurado	
1218	3.1.5	1.5.2.3.6	BSC Santander Overseas Bank (v. 2)	43d	7/2/15	8/31/15	0%	Juan Pablo Jurado	
1219	<i>3.1.5</i>	<i>1.5.2.3.7</i>	<i>Milestone: 2015 Scorecards Complete</i>	<i>0d</i>	<i>12/31/15</i>	<i>12/31/15</i>	<i>0%</i>	<i>Juan Pablo Jurado</i>	
1220	<b>3.1.3</b>	<b>1.5.3</b>	<b>Miami</b>	<b>66d</b>	<b>4/1/15</b>	<b>7/1/15</b>	<b>0%</b>	<b>Lourdes Madariaga</b>	
1221	<b>3.1.3</b>	<b>1.5.3.1</b>	<b>Implement - Risk Tolerance Statement - 2015</b>	<b>66d</b>	<b>4/1/15</b>	<b>7/1/15</b>	<b>0%</b>	<b>Paulo Prado</b>	
1222	<b>3.1.3</b>	<b>1.5.3.1.1</b>	<b>Revise RTS for 2015 metrics - validate if metrics need to be reviewed with SHUSA?</b>	<b>66d</b>	<b>4/1/15</b>	<b>7/1/15</b>	<b>0%</b>	<b>Paulo Prado</b>	
1223	<b>3.1.3</b>	<b>1.5.3.1.1</b>	<b>Update Q1:2015 RTS Metrics</b>	<b>66d</b>	<b>4/1/15</b>	<b>7/1/15</b>	<b>0%</b>	<b>Paulo Prado</b>	<b>L. Madariaga</b>
1224	3.1.3	1.5.3.1.1	Compile Core and Complimentary Metrics for Q1:2015	41d	4/1/15	5/27/15	0%	Paulo Prado	L. Madariaga
1225	3.1.3	1.5.3.1.1	Provide to Audit and Risk Committee to review	6d	5/27/15	6/3/15	0%	Paulo Prado	L. Madariaga
1226	3.1.3	1.5.3.1.1	Provide RTS to BSI Board for approval	20d	6/4/15	7/1/15	0%	Paulo Prado	L. Madariaga
1227	3.1.3	1.5.3.1.1	Milestone: Q1:2015 Risk Tolerance Metrics complete	66d	4/1/15	7/1/15	0%	Paulo Prado	L. Madariaga
1228	<b>3.1.4</b>	<b>1.5.4</b>	<b>New York</b>	<b>215d</b>	<b>5/4/15</b>	<b>2/26/16</b>	<b>0%</b>	<b>Jim Bathon</b>	
1229	<b>3.1.4</b>	<b>1.5.4.1</b>	<b>1.1.6.1 Revise Santander Investment Securities RTS (2015 IHC metrics)</b>	<b>40d</b>	<b>6/1/15</b>	<b>7/24/15</b>	<b>0%</b>	<b>Jim Bathon</b>	
1230	<b>3.1.4</b>	<b>1.5.4.1.1</b>	<b>Coordinate Limits, EWI and discussions with Risk Management Areas (RMAs) and CROs, including review of Strategic Plan for Alignment to Risk Tolerance</b>	<b>40d</b>	<b>6/1/15</b>	<b>7/24/15</b>	<b>0%</b>	<b>Jim Bathon</b>	
1231	3.1.4	1.5.4.1.1	Credit Risk	40d	6/1/15	7/24/15	0%	Jim Bathon	
1232	3.1.4	1.5.4.1.1	Market Risk	40d	6/1/15	7/24/15	0%	Jim Bathon	
1233	3.1.4	1.5.4.1.1	Operational Risk	40d	6/1/15	7/24/15	0%	Jim Bathon	
1234	3.1.4	1.5.4.1.1	Compliance Risk	40d	6/1/15	7/24/15	0%	Jim Bathon	
1235	3.1.4	1.5.4.1.1	Chief Financial Officer - capital and failure to deliver / receive	40d	6/1/15	7/24/15	0%	Jim Bathon	
1236	3.1.4	1.5.4.1.1	Chief Executive Officer	40d	6/1/15	7/24/15	0%	Jim Bathon	
1237	3.1.4	1.5.4.1.1	Legal	40d	6/1/15	7/24/15	0%		

ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
1238	<a href="#">3.1.4</a>	<a href="#">1.5.4.1.1</a>	<a href="#">Milestones: Revised metrics complete</a>	<a href="#">0d</a>	<a href="#">7/24/15</a>	<a href="#">7/24/15</a>	<a href="#">0%</a>	<a href="#">Jim Bathon</a>	
1239	<b>3.1.4</b>	<b>1.5.4.2</b>	<b>1.1.6.2 Revise NY Br RTS (2015 metrics)</b>	<b>20d</b>	<b>6/1/15</b>	<b>6/26/15</b>	<b>0%</b>	<b>Jim Bathon</b>	
1240	<b>3.1.4</b>	<b>1.5.4.2.1</b>	<b>1.1.6.2.1 Coordinate Limits, EWI and discussions with Risk Management Areas (RMAs) and CROs, including review of Strategic Plan for Alignment to Risk Tolerance</b>	<b>20d</b>	<b>6/1/15</b>	<b>6/26/15</b>	<b>0%</b>	<b>Jim Bathon</b>	
1241	3.1.4	1.5.4.2.1	Credit Risk	20d	6/1/15	6/26/15	0%	Jim Bathon	
1242	3.1.4	1.5.4.2.1	Market Risk	20d	6/1/15	6/26/15	0%	Jim Bathon	
1243	3.1.4	1.5.4.2.1	Operational Risk	20d	6/1/15	6/26/15	0%	Jim Bathon	
1244	3.1.4	1.5.4.2.1	Compliance Risk	20d	6/1/15	6/26/15	0%	Jim Bathon	
1245	3.1.4	1.5.4.2.1	Chief Financial Officer	20d	6/1/15	6/26/15	0%	Jim Bathon	
1246	3.1.4	1.5.4.2.1	Chief Risk Officer	20d	6/1/15	6/26/15	0%	Jim Bathon	
1247	3.1.4	1.5.4.2.1	General Manager	20d	6/1/15	6/26/15	0%	Jim Bathon	
1248	<a href="#">3.1.4</a>	<a href="#">1.5.4.2.2</a>	<a href="#">Milestones: Revised metrics complete</a>	<a href="#">0d</a>	<a href="#">6/26/15</a>	<a href="#">6/26/15</a>	<a href="#">0%</a>	<a href="#">Jim Bathon</a>	
1249	<b>3.1.4</b>	<b>1.5.4.3</b>	<b>1.1.6.3 RTS Drafting and Approvals</b>	<b>55d</b>	<b>7/24/15</b>	<b>10/8/15</b>	<b>0%</b>	<b>Jim Bathon</b>	
1250	<b>3.1.4</b>	<b>1.5.4.3.1</b>	<b>1.1.6.3.1 Santander Investment Securities</b>	<b>55d</b>	<b>7/24/15</b>	<b>10/8/15</b>	<b>0%</b>	<b>Jim Bathon</b>	
1251	3.1.4	1.5.4.3.1	1.1.6.3.1.1 Draft RTS	20d	7/24/15	8/20/15	0%	Jim Bathon	
1252	3.1.4	1.5.4.3.1	1.1.6.3.1.2 Review RTS with SAN US Risk Organization	10d	8/21/15	9/3/15	0%	Jim Bathon	
1253	3.1.4	1.5.4.3.1	1.1.6.3.1.3 Circulate Draft to all SIS Management Committee Members	5d	9/4/15	9/10/15	0%	Jim Bathon	
1254	3.1.4	1.5.4.3.1	1.1.6.3.1.4 Incorporate feedback from SIS Risk Management Committee Members	5d	9/11/15	9/17/15	0%	Jim Bathon	
1255	3.1.4	1.5.4.3.1	1.1.6.3.1.5 Final draft submitted to SIS Management Committee - validate when is the April MC meeting	10d	9/18/15	10/1/15	0%	Jim Bathon	
1256	3.1.4	1.5.4.3.1	1.1.6.3.1.6 Presentation to SIS Board of Directors - validate when is the April Board meeting	5d	10/2/15	10/8/15	0%	Jim Bathon	
1257	<a href="#">3.1.4</a>	<a href="#">1.5.4.3.1</a>	<a href="#">Milestone: RTS Approved and Implemented</a>	<a href="#">0d</a>	<a href="#">10/8/15</a>	<a href="#">10/8/15</a>	<a href="#">0%</a>	<a href="#">Jim Bathon</a>	
1258	<b>3.1.4</b>	<b>1.5.4.3.2</b>	<b>1.1.6.3.2 New York Branch</b>	<b>55d</b>	<b>7/24/15</b>	<b>10/8/15</b>	<b>0%</b>	<b>Jim Bathon</b>	
1259	3.1.4	1.5.4.3.2	1.1.6.3.2.1 Draft RTS	20d	7/24/15	8/20/15	0%	Jim Bathon	
1260	3.1.4	1.5.4.3.2	1.1.6.3.2.2 Review RTS with SAN US Risk Organization	10d	8/21/15	9/3/15	0%	Jim Bathon	
1261	3.1.4	1.5.4.3.2	1.1.6.3.2.3 Circulate Draft to all SIS Management Committee Members	5d	9/4/15	9/10/15	0%	Jim Bathon	

ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
1262	3.1.4	1.5.4.3.2	1.1.6.3.2.4 Incorporate feedback from SIS Risk Management Committee Members	5d	9/11/15	9/17/15	0%	Jim Bathon	
1263	3.1.4	1.5.4.3.2	1.1.6.3.2.5 Final draft submitted to SIS Management Committee - validate when is the April MC meeting	10d	9/18/15	10/1/15	0%	Jim Bathon	
1264	3.1.4	1.5.4.3.2	1.1.6.3.2.6 Presentation to SIS Board of Directors - validate when is the April Board meeting	5d	10/2/15	10/8/15	0%	Jim Bathon	
1265	3.1.4	1.5.4.3.2	Milestone: RTS Approved and Implemented	0d	10/8/15	10/8/15	0%	Jim Bathon	
1266	3.1.4	1.5.4.4	1.1.6.4 RTS implementation - modify BAU processes utilizing newly approved 2015 RTS	104d	5/4/15	9/25/15	0%	Jim Bathon	
1267	3.1.4	1.5.4.4.1	1.1.6.4.1 Santander Investment Securities	104d	5/4/15	9/25/15	0%	Jim Bathon	
1268	3.1.4	1.5.4.4.1	1.1.6.4.1.1 Monitoring, Reporting, and Escalation Process in place using 2015 RTS	40d	5/4/15	6/26/15	0%	Jim Bathon	
1269	3.1.4	1.5.4.4.1	1.1.6.4.1.1.1 Training - what is needed for the risk scorecards and mandates - are the metrics SHUSA IHC requires different from what NY is currently performing?	10d	5/4/15	5/15/15	0%	Jim Bathon	
1270	3.1.4	1.5.4.4.1	1.1.6.4.1.1.2 Modify local Policy and procedure on Risk Tolerance monitoring	10d	5/18/15	5/29/15	0%	Jim Bathon	
1271	3.1.4	1.5.4.4.1	1.1.6.4.1.1.3 Determine whether or not there are system requirements to monitor risk tolerance	20d	6/1/15	6/26/15	0%	Jim Bathon	
1272	3.1.4	1.5.4.4.1	1.1.6.4.1.2 Create Risk scorecards and risk mandates	84d	6/1/15	9/25/15	0%	Jim Bathon	
1273	3.1.4	1.5.4.4.1	1.1.6.4.1.2.1 Determine what business lines or segments require Risk Mandates	10d	6/1/15	6/12/15	0%	Jim Bathon	
1274	3.1.4	1.5.4.4.1	1.1.6.4.1.2.2 Enhance SHUSA Risk Mandate templates to use in functional unit workshops for NY	10d	7/6/15	7/17/15	0%	Jim Bathon	
1275	3.1.4	1.5.4.4.1	1.1.6.4.1.2.2.1 GBM - Cash Equities Brokerage	10d	7/6/15	7/17/15	0%	Jim Bathon	
1276	3.1.4	1.5.4.4.1	1.1.6.4.1.2.2.2 Financial Management (ALM)	10d	7/6/15	7/17/15	0%	Jim Bathon	
1277	3.1.4	1.5.4.4.1	1.1.6.4.1.2.2.3 GBM - Equity and Debt Underwriting	10d	7/6/15	7/17/15	0%	Jim Bathon	
1278	3.1.4	1.5.4.4.1	1.1.6.4.1.2.2.4 GBM - Fixed Income / Bond Trading	10d	7/6/15	7/17/15	0%	Jim Bathon	
1279	3.1.4	1.5.4.4.1	1.1.6.4.1.2.2.5 GBM - Futures Brokerage Activity	10d	7/6/15	7/17/15	0%	Jim Bathon	
1280	3.1.4	1.5.4.4.1	1.1.6.4.1.2.2.6 GBM - Fixed Income and Equity Research	10d	7/6/15	7/17/15	0%	Jim Bathon	
1281	3.1.4	1.5.4.4.1	1.1.6.4.1.2.3 Milestone: Schedule workshops for business lines complete	0d	7/17/15	7/17/15	0%	Jim Bathon	
1282	3.1.4	1.5.4.4.1	1.1.6.4.1.2.4 Create shell KRI documents within functional unit workshops	25d	7/6/15	8/7/15	0%	Jim Bathon	
1283	3.1.4	1.5.4.4.1	1.1.6.4.1.2.5 Identify metrics relevant to functional units	25d	7/6/15	8/7/15	0%	Jim Bathon	
1284	3.1.4	1.5.4.4.1	1.1.6.4.1.2.6 Enhance Preliminary limits and early warnings identified in RTS	25d	7/6/15	8/7/15	0%	Jim Bathon	
1285	3.1.4	1.5.4.4.1	1.1.6.4.1.2.7 Create first generation of Risk Mandates	25d	7/6/15	8/7/15	0%	Jim Bathon	

ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
1286	3.1.4	1.5.4.4.1	1.1.6.4.1.2.8 Risk Mandate Workshops complete	25d	7/6/15	8/7/15	0%	Jim Bathon	
1287	3.1.4	1.5.4.4.1	1.1.6.4.1.2.9 Enhance first generation of Risk Mandates	10d	8/3/15	8/14/15	0%	Jim Bathon	
1288	3.1.4	1.5.4.4.1	1.1.6.4.1.2.10 Finalize limits and early warning indicators	10d	8/17/15	8/28/15	0%	Jim Bathon	
1289	3.1.4	1.5.4.4.1	1.1.6.4.1.2.13 Document Final Risk Mandates	10d	8/17/15	8/28/15	0%	Jim Bathon	
1290	3.1.4	1.5.4.4.1	1.1.6.4.1.2.14 Obtain Approval from ERM C	15d	8/31/15	9/18/15	0%	Jim Bathon	
1291	3.1.4	1.5.4.4.1	1.1.6.4.1.2.15 Communicate final Risk Mandates approved by ERM C	15d	8/31/15	9/18/15	0%	Jim Bathon	
1292	3.1.4	1.5.4.4.1	1.1.6.4.1.2.16 Milestone: Workshops conducted	0d	9/25/15	9/25/15	0%	Jim Bathon	
1293	3.1.4	1.5.4.4.1	1.1.6.4.1.2.17 Milestone: SIS Risk Mandates complete	0d	9/25/15	9/25/15	0%	Jim Bathon	
1294	3.1.4	1.5.4.4.2	1.1.6.4.2 New York Branch	104d	5/4/15	9/25/15	0%	Jim Bathon	
1295	3.1.4	1.5.4.4.2	1.1.6.4.2.1 Monitoring, Reporting, and Escalation Process in place using 2015 RTS	40d	5/4/15	6/26/15	0%	Jim Bathon	
1296	3.1.4	1.5.4.4.2	1.1.6.4.2.1.1 Training - what is needed for the risk scorecards and mandates - are the metrics SHUSA IHC requires different from what NY is currently performing?	10d	5/4/15	5/15/15	0%	Jim Bathon	
1297	3.1.4	1.5.4.4.2	1.1.6.4.2.1.2 Modify local Policy and procedure on Risk Tolerance monitoring to align with SHUSA IHC policy	10d	5/18/15	5/29/15	0%	Jim Bathon	
1298	3.1.4	1.5.4.4.2	1.1.6.4.2.1.3 Determine whether or not there are system requirements to monitor risk tolerance	20d	6/1/15	6/26/15	0%	Jim Bathon	
1299	3.1.4	1.5.4.4.2	1.1.6.4.2.2 Create Risk scorecards and risk mandates	84d	6/1/15	9/25/15	0%	Jim Bathon	
1300	3.1.4	1.5.4.4.2	1.1.6.4.2.2.1 Determine what business lines or segments require Risk Mandates	10d	6/1/15	6/12/15	0%	Jim Bathon	
1301	3.1.4	1.5.4.4.2	1.1.6.4.2.2.2 Enhance SHUSA Risk Mandate templates to use in functional unit workshops for NY	10d	7/6/15	7/17/15	0%	Jim Bathon	
1302	3.1.4	1.5.4.4.2	1.1.6.4.2.2.2.1 Commercial Banking (Loans, LOC, Deposit Taking)	10d	7/6/15	7/17/15	0%	Jim Bathon	
1303	3.1.4	1.5.4.4.2	1.1.6.4.2.2.2.2 Swaps Dealing	10d	7/6/15	7/17/15	0%	Jim Bathon	
1304	3.1.4	1.5.4.4.2	1.1.6.4.2.2.3 Milestone: Schedule workshops for business lines complete	0d	7/17/15	7/17/15	0%	Jim Bathon	
1305	3.1.4	1.5.4.4.2	1.1.6.4.2.2.4 Create shell KRI documents within functional unit workshops	41d	7/6/15	8/31/15	0%	Jim Bathon	
1306	3.1.4	1.5.4.4.2	1.1.6.4.2.2.5 Identify metrics relevant to functional units	41d	7/6/15	8/31/15	0%	Jim Bathon	
1307	3.1.4	1.5.4.4.2	1.1.6.4.2.2.6 Enhance Preliminary limits and early warnings identified in RTS	41d	7/6/15	8/31/15	0%	Jim Bathon	
1308	3.1.4	1.5.4.4.2	1.1.6.4.2.2.7 Create first generation of Risk Mandates	41d	7/6/15	8/31/15	0%	Jim Bathon	
1309	3.1.4	1.5.4.4.2	1.1.6.4.2.2.8 Conduct Workshops complete	41d	7/6/15	8/31/15	0%	Jim Bathon	



ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
1310	3.1.4	1.5.4.4.2	1.1.6.4.2.2.9 Enhance first generation of Risk Mandates	10d	8/3/15	8/14/15	0%	Jim Bathon	
1311	3.1.4	1.5.4.4.2	1.1.6.4.2.2.10 Finalize limits and early warning indicators	10d	8/17/15	8/28/15	0%	Jim Bathon	
1312	3.1.4	1.5.4.4.2	1.1.6.4.2.2.11 Document Final Risk Mandates	10d	8/17/15	8/28/15	0%	Jim Bathon	
1313	3.1.4	1.5.4.4.2	1.1.6.4.2.2.12 Obtain Approval from ERM C	15d	8/31/15	9/18/15	0%	Jim Bathon	
1314	3.1.4	1.5.4.4.2	1.1.6.4.2.2.13 Communicate final Risk Mandates approved by ERM C	15d	8/31/15	9/18/15	0%	Jim Bathon	
1315	3.1.4	1.5.4.4.2	1.1.6.4.2.2.14 Milestone: Workshops conducted	0d	9/25/15	9/25/15	0%	Jim Bathon	
1316	3.1.4	1.5.4.4.2	1.1.6.4.2.2.15 Milestone: SIS Risk Mandates complete	0d	9/25/15	9/25/15	0%	Jim Bathon	
1317	3.1.4	1.5.4.5	1.1.6.5 Risk Tolerance 2016 Process	110d	9/28/15	2/26/16	0%	Jim Bathon	
1318	3.1.4	1.5.4.5.1	1.1.6.5.1 Establish Enterprise Risk infrastructure for NY Br and SIS to support Risk Tolerance process (2016)	110d	9/28/15	2/26/16	0%	Jim Bathon	
1319	3.1.4	1.5.4.5.1	1.1.6.5.1.1 Santander Investment Securities	110d	9/28/15	2/26/16	0%	Jim Bathon	
1320	3.1.4	1.5.4.5.1	1.1.6.5.1.1.1 Establish Risk Tolerance Framework	90d	9/28/15	1/29/16	0%	Jim Bathon	
1321	3.1.4	1.5.4.5.1	1.1.6.5.1.1.1.1 Review SHUSA Risk Tolerance Framework	10d	9/28/15	10/9/15	0%	Jim Bathon	
1322	3.1.4	1.5.4.5.1	1.1.6.5.1.1.1.2 Provide feedback to SHUSA Risk Tolerance Framework	10d	10/12/15	10/23/15	0%	Jim Bathon	
1323	3.1.4	1.5.4.5.1	1.1.6.5.1.1.1.3 Adopt SHUSA Risk Tolerance Framework	20d	1/4/16	1/29/16	0%	Jim Bathon	
1324	3.1.4	1.5.4.5.1	1.1.6.5.1.1.2 Establish Risk Tolerance Procedure	20d	1/4/16	1/29/16	0%	Jim Bathon	
1325	3.1.4	1.5.4.5.1	1.1.6.5.1.1.2.1 Adopt SHUSA Risk Tolerance Procedure	20d	1/4/16	1/29/16	0%	Jim Bathon	
1326	3.1.4	1.5.4.5.1	1.1.6.5.1.1.3 Establish Risk Mandate Procedure	20d	1/4/16	1/29/16	0%	Jim Bathon	
1327	3.1.4	1.5.4.5.1	1.1.6.5.1.1.3.1 Adopt SHUSA Risk Mandate Procedure	20d	1/4/16	1/29/16	0%	Jim Bathon	
1328	3.1.4	1.5.4.5.1	1.1.6.5.1.1.4 Establish Risk tolerance reporting monitoring and escalation process	40d	1/4/16	2/26/16	0%	Jim Bathon	
1329	3.1.4	1.5.4.5.1	1.1.6.5.1.1.4.1 Review Risk Tolerance Reporting Monitoring and Esclation Process Documentation	10d	1/4/16	1/15/16	0%	Jim Bathon	
1330	3.1.4	1.5.4.5.1	1.1.6.5.1.1.4.2 Implement SHUSA Risk Tolerance Reporting Monitoring and Escalation Process	30d	1/18/16	2/26/16	0%	Jim Bathon	
1331	3.1.4	1.5.4.5.1	1.1.6.5.1.2 New York Branch	110d	9/28/15	2/26/16	0%	Jim Bathon	
1332	3.1.4	1.5.4.5.1	1.1.6.5.1.2.1 Establish Risk Tolerance Framework	90d	9/28/15	1/29/16	0%	Jim Bathon	
1333	3.1.4	1.5.4.5.1	1.1.6.5.1.2.1.1 Review SHUSA Risk Tolerance Framework	10d	9/28/15	10/9/15	0%	Jim Bathon	
1334	3.1.4	1.5.4.5.1	1.1.6.5.1.2.1.2 Provide feedback to SHUSA Risk Tolerance Framework	10d	10/12/15	10/23/15	0%	Jim Bathon	

ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
1335	<a href="#">3.1.4</a>	<a href="#">1.5.4.5.1</a>	<a href="#">1.1.6.5.1.2.1.3 Adopt SHUSA Risk Tolerance Framework</a>	<a href="#">20d</a>	<a href="#">1/4/16</a>	<a href="#">1/29/16</a>	<a href="#">0%</a>	<a href="#">Jim Bathon</a>	
1336	<b>3.1.4</b>	<b>1.5.4.5.1</b>	<b>1.1.6.5.1.2.2 Establish Risk Tolerance Procedure</b>	<b>20d</b>	<b>1/4/16</b>	<b>1/29/16</b>	<b>0%</b>	<b>Jim Bathon</b>	
1337	3.1.4	1.5.4.5.1	1.1.6.5.1.2.2.1 Adopt SHUSA Risk Tolerance Procedure	20d	1/4/16	1/29/16	0%	Jim Bathon	
1338	<b>3.1.4</b>	<b>1.5.4.5.1</b>	<b>1.1.6.5.1.2.3 Establish Risk Mandate Procedure</b>	<b>20d</b>	<b>1/4/16</b>	<b>1/29/16</b>	<b>0%</b>	<b>Jim Bathon</b>	
1339	3.1.4	1.5.4.5.1	1.1.6.5.1.2.3.1 Adopt SHUSA Risk Mandate Procedure	20d	1/4/16	1/29/16	0%	Jim Bathon	
1340	<b>3.1.4</b>	<b>1.5.4.5.1</b>	<b>1.1.6.5.1.2.4 Establish Risk tolerance reporting monitoring and escalation process</b>	<b>40d</b>	<b>1/4/16</b>	<b>2/26/16</b>	<b>0%</b>	<b>Jim Bathon</b>	
1341	3.1.4	1.5.4.5.1	1.1.6.5.1.2.4.1 Review Risk Tolerance Reporting Monitoring and Esclation Process Documentation	10d	1/4/16	1/15/16	0%	Jim Bathon	
1342	<a href="#">3.1.4</a>	<a href="#">1.5.4.5.1</a>	<a href="#">1.1.6.5.1.2.4.2 Implement SHUSA Risk Tolerance Reporting Monitoring and Escalation Process</a>	<a href="#">30d</a>	<a href="#">1/18/16</a>	<a href="#">2/26/16</a>	<a href="#">0%</a>	<a href="#">Jim Bathon</a>	
1343		<b>1.6</b>	<b>Strategic Plan, Budgeting, and Capital Plan</b>	<b>550d</b>	<b>9/23/13</b>	<b>10/30/15</b>	<b>73%</b>	<b>Diane Allaire</b>	
1344	<b>3.1.3</b>	<b>1.6.1</b>	<b>Miami</b>	<b>88d</b>	<b>7/1/15</b>	<b>10/30/15</b>	<b>0%</b>	<b>Paulo Prado</b>	
1345	<b>3.1.3</b>	<b>1.6.1.1</b>	<b>Implement - Strategic Plan, Budgeting and Capital Plan</b>	<b>88d</b>	<b>7/1/15</b>	<b>10/30/15</b>	<b>0%</b>	<b>Paulo Prado</b>	
1346	<b>3.1.3</b>	<b>1.6.1.1.1</b>	<b>Obtain BSI strategic plan -</b>	<b>43d</b>	<b>7/1/15</b>	<b>8/28/15</b>	<b>0%</b>	<b>Paulo Prado</b>	
1347	<b>3.1.3</b>	<b>1.6.1.1.1</b>	<b>Ensure alignment with SCP for Credit Risk</b>	<b>43d</b>	<b>7/1/15</b>	<b>8/28/15</b>	<b>0%</b>	<b>Paulo Prado</b>	<b>L. Madariaga</b>
1348	3.1.3	1.6.1.1.1	Scorecard for BSI	23d	7/1/15	7/31/15	0%	Paulo Prado	L. Madariaga
1349	3.1.3	1.6.1.1.1	KPI/Metrics for each line of business	20d	8/3/15	8/28/15	0%	Paulo Prado	L. Madariaga
1350	3.1.3	1.6.1.1.2	Develop a process for risk management challenge of the strategic plan	44d	9/1/15	10/30/15	0%	Paulo Prado	L. Madariaga
1351	<b>3.1.5</b>	<b>1.6.2</b>	<b>Puerto Rico (BSBC, BSPR, SIA, SS, SFS, SOB)</b>	<b>462d</b>	<b>9/23/13</b>	<b>6/30/15</b>	<b>96%</b>	<b>Juan Pablo Jurado</b>	
1352	<b>3.1.5</b>	<b>1.6.2.1</b>	<b>Strategic Plan and Budget</b>	<b>462d</b>	<b>9/23/13</b>	<b>6/30/15</b>	<b>94%</b>	<b>Juan Pablo Jurado</b>	
1353	<b>3.1.5</b>	<b>1.6.2.1.1</b>	<b>Scorecards in Strategic Plan and Budget</b>	<b>290d</b>	<b>9/23/13</b>	<b>10/31/14</b>	<b>100%</b>	<b>Juan Pablo Jurado</b>	
1354	<b>3.1.5</b>	<b>1.6.2.1.1</b>	<b>Santander BANCORP</b>	<b>290d</b>	<b>9/23/13</b>	<b>10/31/14</b>	<b>100%</b>	<b>Juan Pablo Jurado</b>	
1355	3.1.5	1.6.2.1.1	Santander BANCORP (v. 1)	45d	9/23/13	11/22/13	100%	Juan Pablo Jurado	
1356	3.1.5	1.6.2.1.1	Santander BANCORP (v. 2)	45d	9/1/14	10/31/14	100%	Juan Pablo Jurado	
1357	3.1.5	1.6.2.1.1	Santander Financial	45d	9/1/14	10/31/14	100%	Juan Pablo Jurado	

ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
1358	3.1.5	1.6.2.1.1	Santander Overseas Bank	45d	9/1/14	10/31/14	100%	Juan Pablo Jurado	
1359	3.1.5	1.6.2.1.2	Validate ERM integration in Strategic Plan is aligned to corporate process	12d	6/15/15	6/30/15	0%	Juan Pablo Jurado	
1360	3.1.5	1.6.2.2	Capital Plan	43d	11/1/13	12/31/13	100%	Juan Pablo Jurado	
1361	3.1.5	1.6.2.3	Liquidity Management Policy	43d	11/1/13	12/31/13	100%	Juan Pablo Jurado	
1362	3.1.5	1.6.2.4	Milestone: 2014 Strategic Plan Updated with ERM's roles and responsibilities	0d	6/30/15	6/30/15	0%	Juan Pablo Jurado	
1363		1.7	Risk Aggregation	567d	5/1/14	7/1/16	34%	Paula Coutinho	
1364	3.1.1	1.7.1	SHUSA	567d	5/1/14	7/1/16	34%	Paula Coutinho	
1365	3.1.1	1.7.1.1	Risk Aggregation Team Org Structure	130d	12/1/14	5/29/15	63%	Paula Coutinho	
1366	3.1.1	1.7.1.1.1	Determine organization structure of risk reporting team (headcount / roles and responsibilities)	20d	12/1/14	12/26/14	100%	Paula Coutinho	Paula C
1367	3.1.1	1.7.1.1.2	Review proposal with head of Risk Architecture	10d	1/12/15	1/23/15	100%	Paula Coutinho	Paula C
1368	3.1.1	1.7.1.1.3	Determine Future State SHUSA Org Structure of Risk Aggregation and corresponding job descriptions	20d	2/23/15	3/20/15	100%	Paula Coutinho	Paula C
1369	3.1.1	1.7.1.1.4	Hire personnel - 2 persons left to hire for Risk Aggregation	50d	3/23/15	5/29/15	25%	Paula Coutinho	Paula C
1370	3.1.1	1.7.1.2	Risk Reporting Tool	385d	1/12/15	7/1/16	2%	Paula Coutinho	
1371	3.1.1	1.7.1.2.1	Define High Level Business Requirements for Risk Reporting	10d	1/12/15	1/23/15	100%	Paula Coutinho	
1372	3.1.1	1.7.1.2.2	Assess whether or not iGRC is the solution	10d	1/12/15	1/23/15	100%	Paula Coutinho	
1373	3.1.1	1.7.1.2.3	Present proposal on Risk Reporting Tool (iGRC) to US CRO	5d	2/2/15	2/6/15	100%	Paula Coutinho	
1374	3.1.1	1.7.1.2.4	Define Implementation Plan for SAS (tactical)	45d	4/6/15	6/5/15	10%	Paula Coutinho	
1375	3.1.1	1.7.1.2.4	Define SAS usage and implementation	45d?	4/6/15	6/5/15	10%	Paula Coutinho	
1376	3.1.1	1.7.1.2.5	Align RDA tool with Risk Reporting Tool to use RDA as the source of information for Risk Reporting (strategic)	130d	1/4/16	7/1/16	0%	Paula Coutinho	
1377	3.1.1	1.7.1.2.5	Credit Risk	130d?	1/4/16	7/1/16	0%	Paula Coutinho	
1378	3.1.1	1.7.1.2.5	Market Risk Trading Book	130d	1/4/16	7/1/16	0%	Paula Coutinho	
1379	3.1.1	1.7.1.2.5	Market Risk Banking Book	130d	1/4/16	7/1/16	0%	Paula Coutinho	

ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
1380	3.1.1	1.7.1.2.5	Operational Risk	130d	1/4/16	7/1/16	0%	Paula Coutinho	
1381	3.1.1	1.7.1.2.5	Compliance - regulatory risk	130d	1/4/16	7/1/16	0%	Paula Coutinho	
1382	3.1.1	1.7.1.2.5	Liquidity	130d	1/4/16	7/1/16	0%	Paula Coutinho	
1383	3.1.1	1.7.1.2.5	Model Risk	130d	1/4/16	7/1/16	0%	Paula Coutinho	
1384	3.1.1	1.7.1.2.5	Strategic Risk	130d	1/4/16	7/1/16	0%	Paula Coutinho	
1385	3.1.1	1.7.1.2.5	Reputational Risk	130d	1/4/16	7/1/16	0%	Paula Coutinho	
1386	3.1.1	1.7.1.2.5	Other Metrics (e.g. Capital, IA)	130d	1/4/16	7/1/16	0%	Paula Coutinho	
1387	<b>3.1.1</b>	<b>1.7.1.3</b>	<b>Review and enhance SHUSA ERM, BERC and Board Reports</b>	<b>185d</b>	<b>9/22/14</b>	<b>6/5/15</b>	<b>86%</b>	<b>Paula Coutinho</b>	
1388	<b>3.1.1</b>	<b>1.7.1.3.1</b>	<b>Monthly Risk Report</b>	<b>115d</b>	<b>9/22/14</b>	<b>2/27/15</b>	<b>100%</b>	<b>Paula Coutinho</b>	
1389	<b>3.1.1</b>	<b>1.7.1.3.1</b>	<b>DEFINITION OF SHUSA Monthly Risk Report</b>	<b>115d</b>	<b>9/22/14</b>	<b>2/27/15</b>	<b>100%</b>	<b>Paula Coutinho</b>	
1390	3.1.1	1.7.1.3.1	Identification and review of key reports and metrics submitted to Management Committees (ERM and BERC)	4d	9/22/14	9/25/14	100%	Paula Coutinho	Paula C
1391	3.1.1	1.7.1.3.1	Meet with US RMs to review and discuss key reports and metrics, review report content, timelines and completeness	6d	9/25/14	10/2/14	100%	Paula Coutinho	Paula C
1392	3.1.1	1.7.1.3.1	Analysis of metrics and required data elements needed to generate the reports	10d	10/2/14	10/15/14	100%	Paula Coutinho	Paula C
1393	3.1.1	1.7.1.3.1	Perform gap analysis of current reports vs corporate monthly risk report and management needs	12d	9/25/14	10/10/14	100%	Paula Coutinho	Paula C
1394	3.1.1	1.7.1.3.1	First draft of new SHUSA Monthly Risk report for review	10d	10/2/14	10/15/14	100%	Paula Coutinho	Paula C
1395	3.1.1	1.7.1.3.1	Feedback from US CRO and other stakeholders	13d	10/15/14	10/31/14	100%	Paula Coutinho	Paula C
1396	3.1.1	1.7.1.3.1	New version of the CRO report template for review	22d	10/31/14	11/30/14	100%	Paula Coutinho	Paula C
1397	3.1.1	1.7.1.3.1	Feedback from Risk Managers and other stakeholders (Spain)	24d	11/30/14	12/31/14	100%	Paula Coutinho	Paula C
1398	3.1.1	1.7.1.3.1	Pre-production (Dec, Jan, Feb Report)	45d	12/22/14	2/20/15	100%	Paula Coutinho	Paula C
1399	3.1.1	1.7.1.3.1	Feedback from US CRO and other Stakeholders	24d	1/20/15	2/20/15	100%	Paula Coutinho	Paula C
1400	3.1.1	1.7.1.3.1	Final version of the Monthly Risk report template to be implemented in February 2014	6d	2/20/15	2/27/15	100%	Paula Coutinho	Paula C
1401	<i>3.1.1</i>	<i>1.7.1.3.1</i>	<i>Milestone: Presentation of new SHUSA Monthly Risk report template to Spain.</i>	<i>0d</i>	<i>2/27/15</i>	<i>2/27/15</i>	<i>100%</i>	<i>Paula Coutinho</i>	<i>Paula C</i>
1402	<b>3.1.1</b>	<b>1.7.1.3.2</b>	<b>CRO Report - Compare Monthly CRO report versus current CRO Report</b>	<b>51d</b>	<b>1/19/15</b>	<b>3/31/15</b>	<b>100%</b>	<b>Patricia Ferrer</b>	
1403	<b>3.1.1</b>	<b>1.7.1.3.2</b>	<b>Definition of SHUSA CRO Report</b>	<b>51d</b>	<b>1/19/15</b>	<b>3/31/15</b>	<b>100%</b>	<b>Patricia Ferrer</b>	
1404	3.1.1	1.7.1.3.2	Set guidelines for new CRO Report - Agree on format and content of CRO Report with US CRO and head of Risk Architecture	10d	1/19/15	1/30/15	100%	Edward Smith	Patricia Ferrer

ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
1405	3.1.1	1.7.1.3.2	Incorporate ERM and BERC charter requirements into CRO Report template	5d	2/2/15	2/6/15	100%	Patricia Ferrer	
1406	3.1.1	1.7.1.3.2	Define new template for CRO Report - incorporating Reputational and Strategic Risk metrics. Also reviewing template with RMAs	15d	2/9/15	2/27/15	100%	Patricia Ferrer	
1407	3.1.1	1.7.1.3.2	Review template head of Risk Architecture	5d	3/2/15	3/6/15	100%	Patricia Ferrer	
1408	3.1.1	1.7.1.3.2	Update template based on feedback	2d	3/9/15	3/10/15	100%	Patricia Ferrer	
1409	3.1.1	1.7.1.3.2	Present new CRO Report to ERM and BERC	8d	3/11/15	3/20/15	100%	John Corston	
1410	3.1.1	1.7.1.3.2	Milestone: New CRO Report Implemented	0d	3/31/15	3/31/15	100%	Paula Coutinho	Paula C
1411	3.1.1	1.7.1.3.3	Incorporation of IHC entities in SHUSA Risk Reporting Process	50d	3/30/15	6/5/15	33%	Paula Coutinho	
1412	3.1.1	1.7.1.3.3	Define Strategy for incorporation of remaining CUSO entities into Risk Reporting Process (timeline)	10d	3/30/15	4/10/15	100%	Paula Coutinho	
1413	3.1.1	1.7.1.3.3	Determine how to align IHC Operating Entities to SHUSA BHC Operating Entity Model	10d	3/30/15	4/10/15	100%	Paula Coutinho	
1414	3.1.1	1.7.1.3.3	Determine risk reporting operating model for Foreign Branches / CUSO consolidation view	10d	3/30/15	4/10/15	100%	Paula Coutinho	
1415	3.1.1	1.7.1.3.3	Discuss implementation strategy with SHUSA Risk Management	40d	4/13/15	6/5/15	0%	Paula Coutinho	
1416	3.1.1	1.7.1.3.3	Draft Strategy Proposal	10d	4/13/15	4/24/15	0%	Paula Coutinho	
1417	3.1.1	1.7.1.3.3	Discuss proposal with SHUSA Risk Management for feedback	10d	4/27/15	5/8/15	0%	Paula Coutinho	
1418	3.1.1	1.7.1.3.3	Finalize Strategy Proposal	10d	5/11/15	5/22/15	0%	Paula Coutinho	
1419	3.1.1	1.7.1.3.3	Provide strategy proposal to US CRO for review and sign off	10d	5/25/15	6/5/15	0%	Paula Coutinho	
1420	3.1.1	1.7.1.4	ERM Area RRF (inventory of metrics required for ERM area risk reporting, including strategic and reputational risk)	125d	1/12/15	7/3/15	62%	Paula Coutinho	Paula C
1421	3.1.1	1.7.1.4.1	Identify add'l metrics required for RDA project (Gap assessment of Spain metrics vs. local regulatory requirements / industry benchmarking)	10d	1/12/15	1/23/15	100%	Patricia Ferrer	
1422	3.1.1	1.7.1.4.2	Review updated ERM and BERC charters to validate if add'l metrics are required	10d	1/26/15	2/6/15	100%	Patricia Ferrer	
1423	3.1.1	1.7.1.4.3	Provide inventory to head of Risk Architecture for feedback	10d	3/11/15	3/24/15	100%	Patricia Ferrer	
1424	3.1.1	1.7.1.4.4	Finalize list of metrics required for Management Reporting (Monthly Risk Report and CRO Report)	5d	3/25/15	3/31/15	100%	Patricia Ferrer	
1425	3.1.1	1.7.1.4.5	For ERM specific metrics (including strategic risk) provide business requirements to RDA (inventory of metrics, how metrics are calculated, source system)	5d	4/1/15	4/7/15	100%	Paula Coutinho	
1426	3.1.1	1.7.1.4.6	For reputational risk provide business requirements to RDA (inventory of metrics, how metrics are calculated, source system)	25d	6/1/15	7/3/15	0%	Paula Coutinho	
1427	3.1.1	1.7.1.5	Formalize ENTERPRISE RISK REPORTING POLICY FOR INTERIM, RISK REPORTING PRACTICES, PRIOR TO THE AVAILABILITY OF ENHANCEMENTS FROM IT/RDA PROJECTS	130d	1/5/15	7/6/15	71%	Paula Coutinho	Paula C

ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
1428	<b>3.1.1</b>	<b>1.7.1.5.1</b>	<b>Define Policy for Enterprise Risk Reporting and Aggregation: governance, suite of consolidated risk reports submitted to SHUSA ERM C and BERC, including reporting content , timelines, abilities and escalation procedures</b>	<b>130d</b>	<b>1/5/15</b>	<b>7/6/15</b>	<b>71%</b>	<b>Paula Coutinho</b>	<b>Paula C</b>
1429	3.1.1	1.7.1.5.1	Draft outline of Risk Reporting Policy, including risk reporting principles and Roles, Responsibilities, Relationships, quality assurance controls, and monitoring principles	10d	1/5/15	1/16/15	100%	Paula Coutinho	
1430	3.1.1	1.7.1.5.1	Review outline with head of Risk Architecture	5d	1/19/15	1/23/15	100%	Paula Coutinho	
1431	3.1.1	1.7.1.5.1	Draft policy content based on outline	10d	1/26/15	2/6/15	100%	Paula Coutinho	
1432	3.1.1	1.7.1.5.1	Review first draft with Risk Mgmt Area with risk governance	30d	2/9/15	3/20/15	100%	Paula Coutinho	
1433	3.1.1	1.7.1.5.1	Update draft based on feedback received from risk governance	5d	3/23/15	3/27/15	100%	Paula Coutinho	
1434	3.1.1	1.7.1.5.1	Review Enterprise Risk Reporting Policy to ensure alignment with Data Quality Risk Framework - need to validate if there is going to be a RA framework	10d	6/1/15	6/12/15	0%	Paula Coutinho	
1435	3.1.1	1.7.1.5.1	Feedback from different stakeholders including sign off by US CRO and head of Risk Architecture	10d	6/15/15	6/26/15	0%	Paula Coutinho	
1436	3.1.1	1.7.1.5.1	Incorporate feedback from stakeholders for final version of Enterprise Risk Reporting Policy	5d	6/29/15	7/3/15	0%	Paula Coutinho	Paula C
1437	<i>3.1.1</i>	<i>1.7.1.5.1</i>	<i>Milestone: Approval of new Enterprise Risk Reporting Policy at ERM C</i>	<i>0d</i>	<i>7/6/15</i>	<i>7/6/15</i>	<i>0%</i>	<i>Paula Coutinho</i>	<i>Paula C</i>
1438	<b>3.1.1</b>	<b>1.7.1.6</b>	<b>Risk Reporting Procedures - documentation should identify stakeholders, inputs, outputs, systems, and manual workflows</b>	<b>41d</b>	<b>5/4/15</b>	<b>6/30/15</b>	<b>0%</b>	<b>Paula Coutinho</b>	<b>Paula C</b>
1439	<b>3.1.1</b>	<b>1.7.1.6.1</b>	<b>Document Risk Reporting Procedure(s)</b>	<b>40d</b>	<b>5/4/15</b>	<b>6/26/15</b>	<b>0%</b>	<b>Paula Coutinho</b>	
1440	<b>3.1.1</b>	<b>1.7.1.6.1</b>	<b>Document quality assurance process to eliminate as many of the data discrepancies as possible in order to sync reporting with SHUSA's general ledger prior to RDA enhancements</b>	<b>20d</b>	<b>5/4/15</b>	<b>5/29/15</b>	<b>0%</b>	<b>Paula Coutinho</b>	<b>Patricia F</b>
1441	3.1.1	1.7.1.6.1	First draft	10d	5/4/15	5/15/15	0%	Paula Coutinho	Patricia F
1442	3.1.1	1.7.1.6.1	Second draft	10d	5/18/15	5/29/15	0%	Paula Coutinho	Patricia F
1443	<b>3.1.1</b>	<b>1.7.1.6.1</b>	<b>Document the change management process for updating risk reports based on regulatory requirements (e.g. assess the need for add'l reports and metrics)</b>	<b>25d</b>	<b>5/4/15</b>	<b>6/5/15</b>	<b>0%</b>	<b>Paula Coutinho</b>	<b>Patricia F</b>
1444	3.1.1	1.7.1.6.1	First draft	10d	5/4/15	5/15/15	0%	Paula Coutinho	Patricia F
1445	3.1.1	1.7.1.6.1	Second draft	10d	5/18/15	5/29/15	0%	Paula Coutinho	Patricia F
1446	<b>3.1.1</b>	<b>1.7.1.6.1</b>	<b>Document the process to create the monthly risk report</b>	<b>20d</b>	<b>6/1/15</b>	<b>6/26/15</b>	<b>0%</b>	<b>Paula Coutinho</b>	<b>Patricia F</b>
1447	3.1.1	1.7.1.6.1	First draft	10d	6/1/15	6/12/15	0%	Paula Coutinho	Patricia F
1448	3.1.1	1.7.1.6.1	Second draft	10d	6/15/15	6/26/15	0%	Paula Coutinho	Patricia F
1449	<b>3.1.1</b>	<b>1.7.1.6.1</b>	<b>Document the process to create the CRO report</b>	<b>20d</b>	<b>6/1/15</b>	<b>6/26/15</b>	<b>0%</b>	<b>Paula Coutinho</b>	<b>Patricia F</b>



ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
1450	3.1.1	1.7.1.6.1	First draft	10d	6/1/15	6/12/15	0%	Paula Coutinho	Patricia F
1451	3.1.1	1.7.1.6.1	Second draft	10d	6/15/15	6/26/15	0%	Paula Coutinho	Patricia F
1452	<b>3.1.1</b>	<b>1.7.1.6.1</b>	<b>Document process to create risk dashboard of institutional review report</b>	<b>20d</b>	<b>6/1/15</b>	<b>6/26/15</b>	<b>0%</b>	<b>Paula Coutinho</b>	<b>Patricia F</b>
1453	3.1.1	1.7.1.6.1	First draft	10d	6/1/15	6/12/15	0%	Paula Coutinho	Patricia F
1454	3.1.1	1.7.1.6.1	Second draft	10d	6/15/15	6/26/15	0%	Paula Coutinho	Patricia F
1455	<b>3.1.1</b>	<b>1.7.1.6.1</b>	<b>Document process to track issue management and remediation</b>	<b>20d</b>	<b>6/1/15</b>	<b>6/26/15</b>	<b>0%</b>	<b>Paula Coutinho</b>	<b>Patricia F</b>
1456	3.1.1	1.7.1.6.1	First draft	10d	6/1/15	6/12/15	0%	Paula Coutinho	Patricia F
1457	3.1.1	1.7.1.6.1	Second draft	10d	6/15/15	6/26/15	0%	Paula Coutinho	Patricia F
1458	3.1.1	1.7.1.6.2	Sign off of procedures by head of Risk Architecture	1d	6/29/15	6/29/15	0%	Paula Coutinho	Patricia F
1459	<i>3.1.1</i>	<i>1.7.1.6.3</i>	<i>Milestone: Enterprise Risk Reporting Procedures in place</i>	<i>0d</i>	<i>6/30/15</i>	<i>6/30/15</i>	<i>0%</i>	<i>Paula Coutinho</i>	<i>Paula C</i>
1460		<b>1.7.1.7</b>	<b>Buid Inventory of SHUSA IHC Entity reports</b>	<b>371d</b>	<b>5/1/14</b>	<b>10/1/15</b>	<b>71%</b>	<b>Paula Coutinho</b>	
1461	<b>3.1.5</b>	<b>1.7.1.7.1</b>	<b>Puerto Rico (BSBC, BSPR, SIA, SS, SFS, SOB)</b>	<b>43d</b>	<b>5/1/14</b>	<b>6/30/14</b>	<b>100%</b>	<b>Juan Pablo Jurado</b>	
1462	<b>3.1.5</b>	<b>1.7.1.7.1</b>	<b>Reporting Framework and Data Control - RDA &amp; RRF</b>	<b>43d</b>	<b>5/1/14</b>	<b>6/30/14</b>	<b>100%</b>	<b>Juan Pablo Jurado</b>	
1463	3.1.5	1.7.1.7.1	Risk Reporting Policy - Bancorp	43d	5/1/14	6/30/14	100%	Juan Pablo Jurado	
1464	3.1.5	1.7.1.7.1	Risk Reporting Policy - SFS	43d	5/1/14	6/30/14	100%	Juan Pablo Jurado	
1465	3.1.5	1.7.1.7.1	Risk Reporting Policy - SOB	43d	5/1/14	6/30/14	100%	Juan Pablo Jurado	
1466	<b>3.1.5</b>	<b>1.7.1.7.2</b>	<b>SHUSA Risk Reporting Gap Assessment</b>	<b>104d</b>	<b>5/11/15</b>	<b>10/1/15</b>	<b>0%</b>	<b>Juan Pablo Jurado</b>	
1467	3.1.5	1.7.1.7.2	Compare SHUSA Risk Reporting Policy with PR Risk Reporting Policy to identify gaps	20d	5/11/15	6/5/15	0%	Juan Pablo Jurado	
1468	3.1.5	1.7.1.7.2	Determine how to address gaps	10d	6/8/15	6/19/15	0%	Juan Pablo Jurado	
1469	3.1.5	1.7.1.7.2	Update PR Risk Reporting Policy	10d	6/22/15	7/3/15	0%	Juan Pablo Jurado	
1470	3.1.5	1.7.1.7.2	Approve PR Risk Reporting Policy SBC BOD	10d	8/24/15	9/4/15	0%	Juan Pablo Jurado	
1471	3.1.5	1.7.1.7.2	Implement Risk Reporting Policy at DROC	18d	9/7/15	9/30/15	0%	Juan Pablo Jurado	
1472	3.1.5	1.7.1.7.2	Milestone: Risk Reporting Policy Implemented	1d	10/1/15	10/1/15	0%	Juan Pablo Jurado	



ID	Project Detail	WBS	Name	Duration	Start	Finish	% Complete	Owner	Resource Names
1473	<b>3.1.5</b>	<b>1.7.1.7.3</b>	<b>Reporting Inventory</b>	<b>20d</b>	<b>2/2/15</b>	<b>2/27/15</b>	<b>100%</b>	<b>Juan Pablo Jurado</b>	
1474	3.1.5	1.7.1.7.3	Identify inventory of reports (Market, Credit, ERM, and Model)	20d	2/2/15	2/27/15	100%	Juan Pablo Jurado	
1475	3.1.5	1.7.1.7.3	Provide inventory of reports and sample of reports to SHUSA Risk Reporting and Aggregation	1d	2/27/15	2/27/15	100%	Juan Pablo Jurado	
1476	<b>3.1.3</b>	<b>1.7.1.7.4</b>	<b>Miami</b>	<b>40d</b>	<b>2/2/15</b>	<b>3/27/15</b>	<b>71%</b>	<b>Lourdes Madariaga</b>	
1477	<b>3.1.3</b>	<b>1.7.1.7.4</b>	<b>2.8 Implement - Monitoring and Reporting process to identify and remediate risk management deficiencies</b>	<b>40d</b>	<b>2/2/15</b>	<b>3/27/15</b>	<b>71%</b>	<b>Lourdes Madariaga</b>	
1478	<b>3.1.3</b>	<b>1.7.1.7.4</b>	<b>2.8.1 Identify Current Inventory of Reports</b>	<b>40d</b>	<b>2/2/15</b>	<b>3/27/15</b>	<b>71%</b>	<b>Lourdes Madariaga</b>	
1479	<b>3.1.3</b>	<b>1.7.1.7.4</b>	<b>2.8.1.1 Build inventory of local reports</b>	<b>40d</b>	<b>2/2/15</b>	<b>3/27/15</b>	<b>92%</b>	<b>Lourdes Madariaga</b>	
1480	3.1.3	1.7.1.7.4	Compliance and Legal	40d	2/2/15	3/27/15	100%	Lourdes Madariaga	
1481	3.1.3	1.7.1.7.4	Market	40d	2/2/15	3/27/15	100%	Lourdes Madariaga	
1482	3.1.3	1.7.1.7.4	Credit	40d	2/2/15	3/27/15	100%	Lourdes Madariaga	
1483	3.1.3	1.7.1.7.4	Operational Risk	40d	2/2/15	3/27/15	100%	Lourdes Madariaga	
1484	3.1.3	1.7.1.7.4	ERM	40d	2/2/15	3/27/15	100%	Lourdes Madariaga	
1485	3.1.3	1.7.1.7.4	Model Risk	40d	2/2/15	3/27/15	50%	Lourdes Madariaga	
1486	<b>3.1.3</b>	<b>1.7.1.7.4</b>	<b>2.8.1.2 Provide inventory of reports to SHUSA</b>	<b>20d</b>	<b>3/2/15</b>	<b>3/27/15</b>	<b>50%</b>	<b>Lourdes Madariaga</b>	
1487	3.1.3	1.7.1.7.4	Compliance and Legal	40d	2/2/15	3/27/15	100%	Lourdes Madariaga	
1488	3.1.3	1.7.1.7.4	Market	40d	2/2/15	3/27/15	0%	Lourdes Madariaga	
1489	3.1.3	1.7.1.7.4	Credit	40d	2/2/15	3/27/15	100%	Lourdes Madariaga	
1490	3.1.3	1.7.1.7.4	Operational Risk	40d	2/2/15	3/27/15	100%	Lourdes Madariaga	
1491	3.1.3	1.7.1.7.4	ERM	40d	2/2/15	3/27/15	0%	Lourdes Madariaga	
1492	3.1.3	1.7.1.7.4	Model Risk	40d	2/2/15	3/27/15	0%	Lourdes Madariaga	
1493	<b>3.1.4</b>	<b>1.7.1.7.5</b>	<b>New York</b>	<b>15d</b>	<b>2/2/15</b>	<b>2/20/15</b>	<b>100%</b>	<b>Jim Bathon</b>	
1494	<b>3.1.4</b>	<b>1.7.1.7.5</b>	<b>1.1.7.1 Identify Current Inventory of Reports: SIS and NY Branch</b>	<b>15d</b>	<b>2/2/15</b>	<b>2/20/15</b>	<b>100%</b>	<b>James Bathon</b>	
1495	3.1.4	1.7.1.7.5	1.1.7.1.1 Build inventory of local reports	10d	2/2/15	2/13/15	100%	Jim Bathon	
1496	3.1.4	1.7.1.7.5	1.1.7.1.2 Provide inventory of reports to SHUSA	5d	2/16/15	2/20/15	100%	Jim Bathon	