

COMPLIANCE PLAN

ID Power

28 June 2018

Non-compliance	Description		
Audit Ref: 3.3 With: <i>Clause 10</i> <i>Schedule 11.1</i> From: 05-Sep-17 To: 25-Jun-18	Failed to provide registry with changed ICP information with 5 business days. Potential impact: None Actual impact: None Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Participant is aware of their responsibilities and has put in place strong controls to eliminate reoccurrence.		
Actions taken to resolve the issue		Completion date	Remedial action status
Staff training		25/5/2018	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
We have included in our training for staff the training on the requirement to keep the registry updated within the time frame allowed within the code. Our current and future management of ICPs which we are responsible for takes this into account and we keep our ICPs up to date.		25/5/2018	

Non-compliance	Description
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Audit Ref: Error! Reference source not found. With: <i>Clause 9</i> <i>Schedule 11.1</i> From: 05-Sep-17 To: 25-Jun-18	Provision of incorrect profile information. Potential impact: None Actual impact: None Audit history: None Controls: Strong Breach risk rating: 1		
Audit risk rating	Rationale for audit risk rating		
Low	Participant is now aware of how profiles are presented on the registry and has provided them correctly on subsequent occasions.		
Actions taken to resolve the issue		Completion date	Remedial action status
Staff training		25/5/2018	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
We have included in our training for staff the training on the requirement to keep the registry updated within the time frame allowed within the code. Our current and future management of ICPs which we are responsible for takes this into account and we keep our ICPs up to date.		25/5/2018	

Non-compliance	Description
Audit Ref: Error! Reference source not found. <i>With: Clause 15.4</i> From: 05-Sep-17 To: 25-Jun-18	Late delivery of submission information. Potential impact: None Actual impact: None Audit history: None Controls: Strong Breach risk rating: 1
Audit risk rating	Rationale for audit risk rating

Low	Participant has corrected the reason for the late submission and has since demonstrated on time provision of submission information.		
Actions taken to resolve the issue		Completion date	Remedial action status
The issue relating to failure to import some files has been solved and automated. Also reports are produced to show that the files import correctly which are checked. The issue relating to trading contracts is managed currently by a greater level of time being allowed for submission file preparation and submission. Also we have had some training in doing the trading contracts.		6/6/2018	Cleared
Preventative actions taken to ensure no further issues will occur		Completion date	
Our system uses automation to solve most issues, however we also will prepare our submission files at least 1 day in advance where this is possible. The relevant automation is completed.		6/6/2018	