

VIJITH V. NAIR

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RISK & COMPLIANCE | DATA MANAGEMENT & GOVERNANCE | ANALYTICS & REPORTING
REGULATORY REPORTING & FINANCIAL CONTROLS | VENDOR & THIRD PARTY MANAGEMENT
PROJECT & CHANGE MANAGEMENT | PROCESS IMPROVEMENT & OPERATIONAL EXCELLENCE

Project/Program Management Executive with deep experience in:

- Program Governance, Project and Change Management, Regulatory Reporting Transformation, Financial Controls Oversight, Operational Risk Management, Transaction Testing/Reviews in support of Capital and Liquidity Regulatory Reporting, CCAR and CFO Attestation in conformance to FRB requirements
- Risk and Compliance with ability to influence the regulators (FRB, OCC, FDIC, SEC) on regulatory compliance issues focused on Operational Risk, Reputation Risk, CCAR, DFAST, BASEL II/III, CLAR, FFIEC 101, 5G, CCPA, CPRA, CDPA, FCRA, SOX, SA-CCR, Vendor/Third Party Risk, Enterprise Stress Testing, Risk Data Aggregation, Enterprise Data Management where ability to strategically respond to MRIs/MRAs issued by regulators is a key driver to success
- Enterprise Data Management/Data Analytics/Process Improvement/Transformation initiatives with Governance and Controls oversight responsibilities driven out of CDO/CRO/CIO Organizations to help articulate a future vision on enterprise data strategy in alignment with current and prospective regulations in the banking industry
- Acting as change agent and collaborator, partnering with Lines of Businesses and Control Functions to establish enterprise wide transformation programs by building highly effective teams with a blend of global delivery capabilities and streamlined IT operations
- Vendor and Third Party management where expertise in Vendor/Third Party Risk Management, Procurement Optimization, Category Planning/Strategy, Purchasing Strategy/Policies/Procedures, Spend Analytics, and Business Continuity will be held at a premium

AREAS OF EXPERTISE

- Enterprise Project/Change Management
- Regulatory Reporting Transformation
- CCAR, DFAST, BASEL II/III, BCBS 239, CLAR, CCPA, CPRA, CDPA, FCRA, SOX, SA-CCR Compliance
- Capital and Liquidity Regulatory Reporting
- FR Y 14 A/Q/M, FR Y 9C, FR 2052A, FFIEC 009/009A/101/102/031/041
- Current Expected Credit Losses (CECL) Models
- CFO Attestation
- Operational Risk Management
- Process Improvement & Operational Excellence
- Enterprise Transaction Testing/Reviews
- Risk & Control Self-Assessment (RCSA), Controls Testing, Data Testing, COSO Controls Framework
- Strategic Responses to MRIs/MRAs/Consent Orders
- Enterprise Data Management Strategy, Data Governance, Policies, Procedures, Data Lineage
- Data Management Capability Assessment Model (DCAM)
- Prioritized Data Supply Chain Management
- Risk & Controls, Data Quality Framework
- Governance, Risk, and Compliance (GRC)
- Risk Data Aggregation, Quantitative Data Analytics
- Consumer Credit, Wholesale/Commercial Credit (CRE, C&I), Cards, Deposits, Traded Products, OTC Derivatives, LoanIQ, nCino, DFS, AFS
- Vendor/Third Party Risk Management, Procurement

EDUCATION

Master of Business Administration in Finance and Strategy - **DUKE University**, Fuqua School of Business
Bachelor of Technology in Computer Science - **Mahatma Gandhi University**, M A College of Engineering

PROFESSIONAL HISTORY

2023 to Present: Citibank, NA
Senior Project Manager

Operational Risk, Regulatory Compliance, Risk & Controls, Governance

Serving as senior project manager for regulatory initiatives aligned to the MRIs and MRAs issued by FRB tied to Annapurna Program. Specific areas of action focused on:

- Identification of Material High Risk, Manual Processing activities that create financial exposures
- Establishing and driving the roll-out of the Process Risk Management Framework and Controls for Manual Processing
- Development of a plan to bring Manual Processing risk within Risk Appetite, inclusive of remediation and enhanced metrics-based monitoring

- Improve the control environment within High-Risk Processes (HRPs) and the underlying Most Significant Processing Risk Exposures (MSPREs)
- Risk & Controls Self-Assessment (RCSA) for High-Risk Processes and Regulatory Reports
- Conduct Process Maturity Assessment with an Action Plan to achieve the establish maturity level
- Governance and Risk Oversight - Establish a BAU Governance Risk Oversight function for Manual Processing
- Enterprise Regulatory Reporting anchored on CCAR CFO Attestation - FFIEC 031, FFIEC 041, FR Y 14/Q/M, FR 2052 A, FR Y-9C
- CFO Attestation and Front-Line Unit (FLU) Business Process Owner Sub Attestation Reviews
- Enterprise Issues Management and Remediation - Supporting Second Line (2LoD) and Audit Reviews
- Supporting Regulator (FRB) and Internal Audit Reviews in alignment with MRIAs and MRAs
- Process, Risk, and Controls (PRC) taxonomy recalibration anchored on SOX Framework
- Recalibrating GRC Policies, Procedures, Standards in alignment with Laws, Rules, and Regulations
- GRC Risk Reporting anchored on Key Performance Indicators and Thresholds

2022 to 2023: Wells Fargo, Charlotte, NC

Senior Project Manager

Operational Risk, Regulatory Compliance, Risk & Controls, Governance

Serving as senior project manager for multiple initiatives under Commercial Banking Compliance/Regulatory/Operational Risk (CROR) Program. Managed Projects/Programs include:

- Risk & Controls Self-Assessment (RCSA) & Evidence Based Controls Evaluation
- Electronic Surveillance
- Contract Risk Management
- Reputation Risk and Environmental Sustainability Initiative

Project management included building target state solution and road maps, governance framework and operating model, upstream process validation, evaluating operating effectiveness of controls, remediating regulatory audit issues and demonstrating sustainability. Specific areas of action focused on:

- Risk & Controls Self-Assessment (RCSA) for high-risk processes mapped to Regulatory Reports
- High Risk Process/Risk/Controls mapping, and inventory build out
- Evidence Based Risk & Controls Testing in line with SOX
- Regulatory Reporting, Data Governance, Data Risk Management, Data Testing
- Issues Management and Remediation - Supporting Internal Audit Reviews
- Risk Identification Process Standardization
- Reputation Risk and Client Environment Sustainability Impact Measurement - Risk Appetite Measurement and Monitoring
- Policy Framework – Standards, Policies, Procedures
- Governance and Risk Oversight
- Implementation of Control Plans - Key Performance Metrics, Thresholds, Monitoring
- Enterprise Rollout of newly built capabilities
- Training and Awareness

2021 to 2022 : Bank of New York Mellon, NY

Project Manager

SOX Basel Independent Validation, Regulatory Reporting, Risk & Controls, Data Governance

Serving as project manager and subject matter expert for the Basel Independent Validation (BIV) initiative for Capital (FFIEC) and Liquidity (FR 2052A) regulatory reporting in response to MRA from FRB. Program scope include issue identification and remediation in line with CFO attestation program, validate Standardized Approach for Counterparty Credit Risk (SA-CCR), building target state governance framework and operating model, upstream process validation, evaluating operating effectiveness of controls, and demonstrating sustainability. Specific areas of action focused on:

- Controls testing of Commercial, Consumer, and Traded Products
- Transaction testing on OTC Derivatives with a focus on Interest Rate Derivatives, FX, Swaps, and Options
- Validate Standardized Approach for Counterparty Credit Risk (SA-CCR) and RWA Calculations
- Risk & Controls Self-Assessment (RCSA) for high-risk processes mapped to Regulatory Reporting
- Data Lineage identification and mapping in support of SOX validation

- Data Governance, Data Risk Management, Data Testing
- Consolidating SOX validation programs for Capital and Liquidity Regulatory Reporting
- Issues Management and Remediation
- Supporting Internal Audit Reviews

2020 to 2021: Citibank, NA
Transformation Program Manager

Operational Risk, Reputation Risk, Data Governance, Risk & Controls, Regulatory Reporting

Managed Risk & Controls transformation program providing Citibank stakeholders with program management, guidance and direction regarding target state operating model and program governance framework for operational risk management as part of Citibank's response to the Consent Order issued by the Office of the Comptroller of the Currency (OCC) aligned to the deficiencies in firm's Operational Risk Management (ORM) processes. Specific areas of action for ORM included launching an Enterprise Risk and Controls program focused on:

- Risk Process Inventory Management and Controls Mapping
- Risk Identification Process Standardization
- Risk Appetite Assessment and Application of Risk Appetite Principles
- Reputation Risk Impact Measurement
- Policy Framework – Standards, Policies, Procedures
- Governance and Risk Oversight
- Issue Remediation, Implementation of Compensating Measures
- Metrics, Thresholds and Monitoring
- Risk Identification Process Standardization
- Program Alignment with Enterprise Workstreams

2013 to 2020: Bank of America, Charlotte, NC
Senior Vice President, Chief Accounting Office - Global Regulatory Reporting
Enterprise Transaction Review Program Executive

Established and led Enterprise Capital and Liquidity Transaction Review Program from ground up (120+ member team) within CFO Chief Accounting Office to perform ongoing quarterly transaction reviews in support of Capital and Liquidity Regulatory Reporting (CCAR, FR Y 14 A/Q/M Reporting, 5G, CFO Attestation) as part of Bank of America's response to the 2 MRIs, and 4 MRAs issued by the Federal Reserve Board aligned to the deficiencies in firm's internal controls and accuracy of regulatory reporting resulting in significant misstatements. Specific feedback included focus on ensuring strong controls at front line unit business processes, data capture processes and transport of data from point of capture/origin to the regulatory report submission. The MRIs and MRAs were the end result of an exam conducted by the FRB in Q1/Q2 2016 focused on:

- Evaluating the accuracy and completeness of the FR Y 14 A/Q/M reporting data, and submission to the FRB
- Determining the effectiveness of reporting process in conformance to FRB reporting instructions and report data dictionary
- Data Integrity at Source and Internal Controls covering System Controls for Data Providers and System Limitations
- Assessment of the firm's data governance, internal controls, data infrastructure, and internal audit.
- Determining the quality of loan portfolio, overall asset quality, the adequacy of loss allowances and capital levels, and the adequacy of risk management practices

Program recognized as Industry Leader in CCAR CFO Attestation Programs in peer reviews. Since inception, the program has expanded its scope:

- Recognized as Accuracy Control for CCAR and CFO Attestation
- Review function for Capital, FFIEC009, FR Y 9C, 5G Regulatory Reports

Senior Vice President, Chief Data Office - Enterprise Data Management Governance and Control
CCAR Remediation Program Executive

Drove Bank of America's response to the Significant Deficiency (SD) MRIA around Enterprise Data Management Governance and Controls in alignment with FRB's request to the bank to resubmit 2015 Capital Plan for CCAR by 9/2/15. This MRIA was the end result of different but related Control Deficiencies (CD) which resulted in a Sev 1 Audit Issue to Enterprise Data Management Governance and Control Organization with three components.

- Bringing transparency to end to end data governance covering control deficiencies around Key Business Elements (KBES) contributing to the Enterprise Capital Plan, Credit Risk Disclosures, and FR Y 14 A/Q/M Schedules.

- End to end accuracy and completeness controls associated with Critical Information Path capturing flows from SOO through end user/regulatory reports.
- Coverage and precision of controls over manual entries supporting Financial/Regulatory reporting subject to financial statement materiality.

The program resulted in defining Data Governance models for the four Prioritized Data Supply Chains for the Enterprise – Capital, Credit Risk Disclosures, FR Y 14 A/Q/M Schedules, Liquidity. The capital plan along with SD remediation was resubmitted on 9/2/15 which was approved by FRB on 12/10/15.

- Partnered with CCAR leaders across the enterprise to develop a strategic, multi-year, enterprise roadmap for CCAR program.
- Defined new/recalibrated old/realigned the Enterprise Data Management Standards/Policies/Procedures and Adherence processes to support Regulatory Compliance initiatives at two levels - Enterprise vs. Local.
- Implemented a repeatable and scalable data governance model for Enterprise Prioritized Data Supply Chains – Capital, Credit Risk Disclosures, FR Y 14 A/Q/M schedules and Liquidity.
- Created and implemented a CCAR program governance structure for EDM G&C that efficiently drove accountability and transparency into the underlying project execution and the associated tangible business outcomes.
- Communicated, influenced and negotiated both vertically and horizontally to obtain agreement between CCAR partners, Audit (Internal/External) and Regulators and escalate items, when needed, to ensure execution remains on track.

Senior Vice President, Global Corporate Services - Third Party Administration Vendor and Third Party Risk Strategy and Governance Executive

Pioneered the launch of this key leadership role, defining an enterprise-wide strategy to govern the management of all vendors and third parties providing services for this multi-billion dollar financial services company. Defined a formal governance framework driven out of a MRIA from OCC defining policies and procedures for third parties as a broader umbrella covering all third parties including vendors in alignment with enterprise data management standards.

- Served as the architect of an end-to-end governance model/framework for Third Party governance life cycle – Plan, Source, Manage.
- Introduced and championed Vendor Data Standardization (VDS) program, with the goal of achieving and sustaining compliance with EDM (Enterprise Data Management) and RDA (Risk Data Aggregation) guidelines, ultimately positioning the department as the single source of information regarding third parties and vendors for the company.
- Developed a 3-year roadmap guiding the company's strategy with respect to third party and vendor relationships.
- Built and championed new platforms for Vendor Risk and Performance Management, Third Party Inventory, Spend Analytics & Category Optimization.
- Built and led a high performing team from the ground up, entrusted with the management of key Vendor/Third Party Risk projects across the organization.
- Led the development of strategies designed to maintain business continuity in the event of vendor disruptions; effectively mitigating risk through a global network of vendors to minimize the impact of interruptions.
- Sponsored and managed the development of an effective and compliant data management platforms for Third Party Administration, and enablement and delivery of data/information, resulting in strong platform performance, sound development, accurate data availability and strong data management practices and processes.

2013 to 2013: Ernst & Young Executive Consultant

Served as a trusted advisor and subject matter expert, providing Bank of America stakeholders with guidance and direction regarding target state architecture, current state assessment, and the development of a multi-generation road map for vendor risk management data transformation processes. Achieved distinction as being the author of the MRIA response that was adopted as an industry standard by leading Fortune 500 enterprise financial services corporations in the vendor data transformation space.

- Recognized with the offer to join Bank of America to fill the newly-created position of Senior Vice President - Vendor and Third Party Risk Strategy and Governance Executive.

Key Client Engagements

- **BANK OF AMERICA, WHOLESALE CREDIT TRANSFORMATION.** Influenced the design and execution of a roadmap, providing input from a business strategy perspective on the implementation of an end-to-end credit platform for wholesale credit lending driven by process and work management, business rules, and business activity monitoring. The result was a solution that transformed credit interactions into an intuitive process for both employees and clients.

- **BANK OF AMERICA, VENDOR RISK MANAGEMENT.** Provided guidance and direction to Bank of America regarding target state architecture, current state assessment and multi generation road map for vendor risk management data transformation processes. The initiative impacted multiple upstream and downstream systems as well as vendor-owned platforms and systems. This project helped the bank to address items in an MRIA, identifying and mitigating risks associated with multiple vendor categories while establishing a comprehensive control frame work across the entire vendor administration in line with enterprise data management principles.

2007 to 2012: IBM Global Business Services Executive Consultant

A demonstrated record of success and achievement in multiple client engagements on behalf of the world's largest business and technology services provider, offering strategic solutions to businesses. Outstanding and exceptional results recognized with multiple *IBM Service Excellence Awards* for 2012, 2011, 2010, 2009, and 2008.

Key Client Engagements

- **AMERICAN EXPRESS, BASEL II DATA GOVERNANCE.** Served as Data Governance Leader tasked with developing and implementing the Basel II Data Governance Organization, leading the definition of all roles, structure, responsibilities, and an engagement model.
 - Efforts resulted in the establishment of a high degree of control and oversight of data and data management processes, in full compliance with the Basel II Final Rule and ensuring preparedness for FDIC-led audits.
- **MARKEL INSURANCE, IBNR RESERVING ANALYTICS.** Constructed the necessary frameworks to deliver an enterprise-level view of wholesale program data as the Analytics Program Leader, recruited based on prior success in M&A engagements.
 - Successfully attained all key deliverables, including analytical requirements, a data warehouse, an actuarial data mart, analytical reports, multi dimensional cubes, loss triangle reports, and ad hoc analysis.
 - Developed a unified IBNR reserving engine that supported the main organization and subsidiaries, achieving \$15MM in annual savings and empowering the sunset of legacy systems for ODS, Operational Data Mart, Navigator Portal and Broker Portal.
- **AIG, GLOBAL INSURANCE CLAIMS OPTIMIZATION.** Fulfilled a key role developing mission-critical components of a solution to meet the needs of the Global Insurance Claims department, including current state assessments, target-state architecture, and other areas.
 - Delivered the ability to process claims in over 85 countries, as well as new processes to govern high-frequency, low complexity claims; captured a 20% boost in the efficiency of claim handling while slashing claim processing expenses by 30%.
- **REGIONS BANK, CUSTOMER PROFITABILITY AND MARKET SEGMENTATION.** Served as the Program Data Integration Lead/Solution Architect, creating a BI solution that integrated data from the Retail, Commercial, Investments, and Brokerage lines of business, into a single platform providing insight into profitability, risk, and marketing.
 - Improved the organization's ability to assess profitability and develop KPI-driven marketing strategies that led to gains in customer acquisition and retention; profits increased by 10% with 15% YOY market base growth.
- **BANK OF MONTREAL, CREDIT RISK DATA WAREHOUSE.** Successfully integrated the principles of Basel II into the bank's daily risk management processes, building a scalable Enterprise Data Warehouse architecture, an offshore analytics competency center, and a roadmap that allowed the EIS organization to leverage the strength of the bank's global delivery capabilities in future analytics engagements.
- **SUNTRUST BANKS, BASEL II CREDIT RISK DATA PROVISIONING.** Developed and delivered an analytics solution support Regulatory Capital Calculation, Risk Adjusted Profitability, Risk Based Pricing, and Reconciliation based on Basel II principles. Deployed a Credit Risk Data Mart and a scalable Enterprise Data Warehouse, which together provided access to advanced analytics and reporting abilities. Recipient of the *Delivery Excellence Award*.

2006 to 2007: Wipro Technologies Limited Consultant

Served as a Solution Architect designing a Hub and Spoke model for the Enterprise Information Systems organization of Capital One, a client of this provider of IT Services, Business and Technology consulting. Migrated all data from multiple disparate data marts and warehouses onto a single platform, and provided a roadmap of the new structure to guide the performance of future migrations. Captured a 40% reduction in operation cycle times.

2002 to 2006: Infosys Technologies Limited Consultant

Leveraged superior technical expertise to serve as Project Manager, Solution Architect, and Team Lead on a number of client engagements for this provider of business consulting, information technology, software engineering and outsourcing

services. Recognized with the *Shared Success Award* from Wachovia in 2006 and 2007, as well as the *Star Award* from Citibank in Singapore.

Key Client Engagements

- **WELLS FARGO, WACHOVIA-WESTCORP MERGER AND DATA INTEGRATION.** Empowered the bank to do business across multiple time zones concurrently through the development of an effective business/technology processing model and roadmap to govern future integrations.
- **WELLS FARGO, BASEL II VENDOR LIAISON.** Led a current state assessment of Risk Data Management policies to address gaps and serve as the bank's representative in engagements with vendors tasked with building a Basel II-compliance Credit Risk Data Mart.
- **CITIBANK, DATA WAREHOUSE AND ODS FOR PRIVATE BANKING GROUP.** Delivered a Private Banking Data Warehouse and ODS as the ETL Team Lead for the Asia Pacific Region, working out of Singapore. Empowered the integration of data to produce month-end statements for clients in Asia, part of a global implementation that included counterpart programs in New York and Europe.