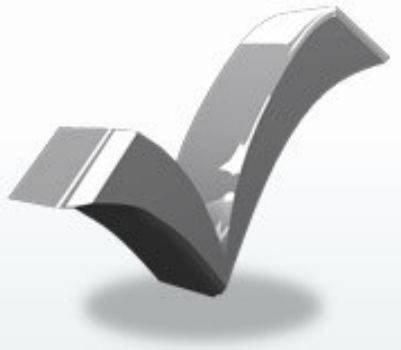




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Business Continuity Planning



**What is the single most challenging
Sarbanes-Oxley issue today?**

**by Sanjay Anand, CEO of Sarbanes Oxley Group
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Sarbanes-Oxley Issues

What is the single most challenging Sarbanes-Oxley issue today?

Sanjay Anand, CEO of Sarbanes Oxley Group

As with any compliance project the challenges associated with a Sarbanes-Oxley implementation, in descending order of organizational impact, are:

1. People
2. Process
3. Technology

The key challenge is, and has always been, finding, hiring, training and retaining top talent. Sarbanes-Oxley is no different.

While the “mechanics” of the legislation have had executives and others focusing on the process and technology aspects of compliance, it is ultimately the quality and the caliber of the people that will ultimately determine the outcome of the project.

Here is a list of the most frequently encountered human-resource related challenges in a Sarbanes-Oxley “implementation”:

1. Knowledge, skills and abilities: The ability of the people to do their jobs and perform in their assigned roles and capacities. Specifically, for example, roles related to the establishment of internal controls, the assessment and auditing of those controls, the technology aspects and implications of setup and auditing, the project management of the compliance project, and above all a broad-based understanding of Sarbanes-Oxley and how it fits into and impacts the organization in particular and the corporate world in general.
2. Ethics and values: While the sections of the Act outline the requirements from a legislative standpoint, underlying those aspects is the ethical expectation of the individuals involved. Do the organizational values create an atmosphere of ethical conduct in the organization, or is it the ethical nature of the individuals that ultimately determines the organization’s Code of Conduct and its ability to consistently follow-through on it? It is truly a “chicken-and-egg” question.
3. Leadership: The “tone at the top” can literally make or break the project. The individuals responsible for providing organizational and project leadership play a key role in how a Sarbanes-Oxley effort eventually turns out.

Here are some suggestions on how you can mitigate some of your risks and challenges around the “people issue” in a Sarbanes-Oxley compliance project:

1. Training, training, training. The most critical ingredient and must be implemented as an ongoing process rather than a one-time occurrence. The training must include two



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components: broad-based education in the fundamental tenets of Sarbanes-Oxley and more detailed exposure to job-specific aspects of compliance.

2. Code of Conduct: Don't just create a Code of Conduct and Statement of Ethics because you "have to" or because you're "supposed to", but rather create it because you know that it will serve as the guiding light in the event of any questions that arise around both implementing as well as enforcing the discipline of SOX in the organization.
3. Board buy-in: SOX puts the CEO and CFO on the hook to comply. This in itself should be a sufficient motivator to encourage and ensure board-level buy-in, involvement and accountability in the Sarbanes-Oxley compliance project. But in case it isn't, I have listed it here.

In conclusion, here are the top three reasons why you must invest in and develop your professionals who are leading, implementing and validating your SOX effort:

1. Organizations are comprised of people, and therefore tend to behave very much like the aggregation of the people involved.
2. The CEO and the CFO cannot implement an entire SOX process in the organization themselves. They must depend upon reliable and qualified people to do this for them.
3. SOX is about creating processes, procedures and check-and-balances in the organization so as to minimize the organization's exposure to the individual "whims and fancies" of the people involved.

Take good care of your people. Find, hire, train and retain the best talent. And SOX will be a breeze (relatively speaking, of course).

The Sarbanes Oxley Group of Auditors and Professionals is the provider of SOXBase and SOXPro level training and certification programs for Audit and Non-Audit Professionals involved in (or looking to get involved in) SOX-related compliance projects. Founded in early 2003, the Group today is one of the largest and most active online SOX communities, and through its members is committed to establishing and enforcing the industry-wide standards for Sarbanes Oxley compliance, professionalism, knowledge, expertise and ethics.

SOXGAP is recognized for its contributions to Sarbanes-Oxley-related research and education at the exclusive and highly respected Master Key level at the Institute of Internal Auditors (IIA) Research Foundation, the Financial Executives International (FEI) Research Foundation and the International Association for Continuing Education and Training (IACET).



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About Saragosta Group

Saragosta Group is a young and dynamic IT consulting and services firm that delivers High Impact and High Value Services to Large and Medium sized Polish companies in Business Critical areas of consulting, IT solutions and IT services.

We have our base in Warszawa and are active across all of Poland. Through our extensive partner network, we are capable of supporting our customers both in Poland and internationally.

Saragosta Group has expanded its capabilities to provide our customers with a portfolio of high quality business critical solutions within consulting and IT services on top of Business Continuity Planning and Risk Management. Saragosta Group now consists of Saragosta Consulting and Saragosta IT Services.

The Saragosta Portfolio

Saragosta Group is a customer driven organization.

Our core competency lies in our ability to help our customers to meet their challenges.

This means that we are agile and adaptive in responding to our customers need and acquire new competencies rapidly through an extensive network and business partners. We maintain our own skills and competencies in the areas of IT Services and Consulting that are seen to be the most critical for our customers and their business and by continuously seeking to acquire new expertise in areas that are related to our core competencies.

The Saragosta Group portfolio includes key solutions and services within critical areas of Risk management and Business Continuity Planning as well as key infrastructure services managing information, applications, processes, users and workstations. The key activity areas are the following:

- **Business Continuity Planning**
- **Risk Management**
- **Strategy and Change**
- **Process Optimization**
- **Business Integration**
- **IT Management and Security**
- **Information Management**
- **E-commerce/Web solutions**
- **Solutions for Payment Systems for Banking**
- **Solutions for Anti-money laundering for Banking**

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