

Clause 2 – Roles and Responsibilities of the Board

- For board to oversee implementation of CIRR, suggest clarity on expectations in terms of how this oversight should be operationalised

Clause 6 – Funding

- As it is not entirely public, would the FSB recommend where benchmark comparisons can be obtained for spending allocations. Or even publish centrally which would help.

Clause 8 – Metrics

- Suggest for type of metrics to be made clear (i.e. type of metrics, general expectations)

Clause 18 – Third party cyber service providers

- Similar to forensic retainer services, should the FSB prescribe this for this clause as well?

Clause 46 – Cyber Incident Reporting

- As it is mentioned for cyber incident reporting that it should be done to authorities asap, will FSB also coordinate with regulators to have the same communications in the other direction? That would help as a centralised source of intel to the industry.