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| <b>Ref No</b> | DI/CP44-R/2026                                                                                                                                                           | <b>Issued on</b> | 22 September 2026 |
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### 3.2 Exposure Draft on Guidance Paper for Resolvability Assessment – Operational Continuity in Resolution

Respondents generally supported the OCIR requirements, noting that they are aligned with existing BNM requirements relating to RCP, BCM and Outsourcing Policy Documents. This alignment was viewed as helpful in enabling DTMs to leverage existing frameworks and practices. Feedback focused primarily on areas where further clarification would support implementation, including the identification and mapping of operational dependencies, materiality assessments and the demonstration of contractual resilience.

#### a. Identification and Mapping of Operational Dependencies

DTMs are required to identify, map and maintain operational dependencies that support critical functions and critical shared services. This mapping should be sufficiently granular to identify material dependencies and support operational continuity, while remaining proportionate to each DTM's size and complexity.

| No. | Feedback Received                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | Response by PIDM                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
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| 1.  | <p><b>Operational Dependency Mapping and the use of Existing Mappings prepared under BNM's Policy Documents</b></p> <p>Respondents sought clarification on:</p> <ul style="list-style-type: none"> <li>(a) the expected scope and granularity of operational dependencies to be mapped, including provider and recipient relationships;</li> <li>(b) dependencies that extend beyond the defined Transfer Perimeter; and</li> <li>(c) extent to which existing mappings prepared under BCM, RCP and Outsourcing Policy Documents may be leveraged.</li> </ul> <p>Respondents also highlighted practical challenges in producing comprehensive</p> | <p>PIDM wishes to clarify that the mapping is expected to cover all operational dependencies supporting the Transfer Perimeter, including critical employee positions, underlying operational assets, and relevant contracts and arrangements<sup>1</sup>.</p> <p>DTMs may leverage existing mappings developed for risk management and regulatory purposes, including those prepared under the BCM, RCP and Outsourcing Policy Documents. However, DTMs should assess whether these mappings are sufficient for OCIR purposes,</p> |

<sup>1</sup> Please refer to paragraph 3.1.2 of the OCIR Guidance Paper

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| No. | Feedback Received                                                                                                                                                 | Response by PIDM                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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|     | mappings, particularly where data sources are disaggregated, processes are maintained manually, or dependencies involve intra-group and head office arrangements. | <p>as the required scope and granularity may differ from those submitted under the RCP Policy Document.</p> <p>For the purpose of the OCIR Guidance Paper, DTMs should identify and map all operational dependencies supporting the Transfer Perimeter, including dependencies that may subsequently be assessed as non-material. DTMs may refer to Figure 3 of the OCIR Guidance Paper for an illustrative example of the identification and mapping of operational dependencies.</p> |

#### b. Assessment of Materiality of Operational Dependencies

DTMs are required to assess the materiality of operational dependencies to support the prioritisation of remediation efforts. This assessment should consider the impact of discontinuance, the substitutability of operational services and whether appropriate mitigating measures are in place to support the continuity. Where relevant, DTMs may leverage existing criticality or materiality assessments conducted under the RCP Policy Document.

| No. | Feedback Received                                                                                                                                                                                                                                                                                                                                       | Response by PIDM                                                                                                                                                                                                                                                                                                                         |
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| 1.  | <p><b>Methodology for Assessing Materiality of Operational Dependencies</b></p> <p>Respondents sought clarification and guidance on:</p> <p>(a) the extent to which the materiality assessment under OCIR should be aligned with the criticality or materiality assessment performed in the Recovery Plan, including assessment related to critical</p> | <p>PIDM has clarified in the OCIR Guidance Paper that DTMs may leverage existing methodologies developed under the RCP Policy Document when assessing the materiality of operational dependencies.</p> <p>PIDM does not intend to prescribe quantitative thresholds at this stage, as the materiality assessment should remain risk-</p> |

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| No. | Feedback Received                                                                                                                                                                                                                                                                                                                                                                                            | Response by PIDM                                                                                                                                       |
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|     | <p>functions, core business lines, critical shared services; and</p> <p>(b) whether PIDM intends to prescribe quantitative thresholds, benchmarks or a scoring framework to support consistent assessment of materiality across DTMs.</p> <p>A few respondents suggested supplementary factors for consideration, such as customer impact, regulatory obligations and real-time processing requirements.</p> | <p>based. Additional examples of supplementary factors have been included in the OCIR Guidance Paper to support DTMs in conducting the assessment.</p> |

### c. Demonstration of Contractual Resilience

DTMs are required to review their critical shared services and/or material operational service contracts and demonstrate that adequate arrangements are in place to ensure the continuity of such services upon entry into resolution and throughout the resolution process. Implementation of resolution-resilient contractual arrangements may be undertaken in phases, with priority given in the initial phase to unique services.

| No. | Feedback Received                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | Response by PIDM                                                                                                                                                                                                                                                                                                                                        |
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| 1.  | <p><b>Scope of Critical Shared Services and/or Material Operational Service Contracts and Alternative Mitigants to Ensure Continuity</b></p> <p>Respondents noted that the entry into resolution, or the exercise of PIDM's resolution powers, may constitute an event of default or trigger termination rights under existing contracts.</p> <p>Respondents sought clarification on:</p> <p>(a) the scope of contracts to be remediated, including whether remediation applies to all material</p> | <p>PIDM clarifies that the demonstration of contractual resilience applies to critical shared services and/or material operational services where no existing mitigating measures are in place to support continuity upon entry into, and throughout, resolution. DTMs are expected to prioritise unique services supporting the Transfer Strategy.</p> |

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| No. | Feedback Received                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | Response by PIDM                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
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|     | <p>contracts or only contracts supporting critical functions or critical shared services;</p> <p>(b) acceptable alternative mitigating measures where resolution-resilient clauses cannot be incorporated within relevant timeframes; and</p> <p>(c) whether remediation may be undertaken on a phased basis, taking into account renewal cycles or risk-based prioritisation.</p>                                                                                                                                                                                                                                                                                                                             | <p>Where resolution-resilient clauses cannot be incorporated within the relevant timeframe, DTMs should identify and implement alternative mitigants such as pre-identified substitute providers and other continuity arrangements.</p> <p>Remediation may be undertaken on a phased basis, taking into account the materiality and uniqueness of the operational services, practicable implementation considerations and where appropriate, the DTM's normal contract renewal cycles.</p>                                                                                                                                                                                                                                                                                        |
| 2.  | <p><b>Sample Contractual Clauses and Industry Standardisation</b></p> <p>Respondents expressed concerns regarding the requirement to have resolution-resilient contractual provisions in critical shared services and/or material operational service contracts, noting that:</p> <p>(a) DTMs may have limited bargaining leverage when dealing with dominant global service providers, such as cloud service providers, core banking system vendors;</p> <p>(b) service providers may be more receptive if such provisions are positioned as an industry-wide regulatory expectation rather than a DTM-specific request; and</p> <p>(c) standardised language may reduce prolonged legal negotiations and</p> | <p>PIDM has considered the feedback received. While sample clauses may promote consistency and at times facilitate negotiations, PIDM does not intend to issue standard contractual clauses, given the differences in service types, operational arrangements, governing laws, and commercial considerations. Instead, PIDM has clarified in the OCIR Guidance Paper the expected outcomes and key elements of resolution-resilient contractual arrangements.</p> <p>This principles-based approach is intended to support DTMs in negotiating contractual terms that facilitate continuity and transferability of critical shared services and/or material operational services in resolution, while preserving flexibility for contractual language to reflect the specific</p> |

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| No. | Feedback Received                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Response by PIDM                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
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|     | <p>promote consistency across the industry.</p> <p>Respondents suggested that PIDM provide sample contractual clauses that DTMs may adapt when negotiating with third-party service providers.</p> <p>A few respondents also suggested that PIDM aligns its expectations with international frameworks on resolution stays and contractual resilience.</p>                                                                                                                                                                                                                                                                                                                                | <p>circumstances of DTMs and their service providers.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| 3.  | <p><b>Prioritisation of Unique Services under the Transfer Strategy</b></p> <p>Respondents sought clarification on the methodology for assessing and prioritising unique services, including:</p> <p>(a) whether DTMs may leverage existing methodologies and assessments, such as business impact analyses conducted under the BCM Policy Document and criticality assessments conducted under the RCP Policy Document; and</p> <p>(b) whether factors such as criticality to business operations, legal and regulatory obligations, time-sensitivity, technical complexity and interconnectedness with other applications should be incorporated into the prioritisation framework.</p> | <p>PIDM notes the feedback received. DTMs may leverage existing methodologies and assessment, including business impact analysis conducted under the BCM Policy Document and criticality assessments under the RCP Policy Document, as a starting point in assessing and prioritising unique services.</p> <p>PIDM clarifies that prioritisation under OCIR should reflect resolution-execution considerations, which may differ from business-as-usual ("BAU") or recovery scenarios.</p> <p>In prioritising unique services, DTMs should focus on services that are essential to maintaining the operational continuity of the Transfer Perimeter, particularly where the Transfer Perimeter would be unable to operate without such services. DTMs may consider, among others, the following factors:</p> |

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| No. | Feedback Received                                                                                                                                                                        | Response by PIDM                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
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|     |                                                                                                                                                                                          | <p>(a) criticality to the execution of the Transfer Strategy and continuity of critical functions/critical shared services;</p> <p>(b) substitutability within resolution timelines;</p> <p>(c) legal and regulatory obligations; and</p> <p>(d) the degree of interconnectedness and technical complexity of the service.</p>                                                                                                                                                                                                                                                                                                                                                                                         |
| 4.  | <p><b>Transitional Service Agreement ("TSA")</b></p> <p>Some respondents sought clarification on whether services under a TSA are intended to be provided "to" or "by" the acquirer.</p> | <p>PIDM has clarified in the OCIR Guidance Paper that reference to TSA<sup>2</sup> is intended to cover both:</p> <p>a) forward arrangements, under which services continue to be provided by the successor or Transferee<sup>3</sup> to the DTM; and</p> <p>b) reverse arrangements, under which services continue to be provided by the DTM to the successor or Transferee, following the implementation of the transfer strategy, where relevant.</p> <p>This clarification is intended to ensure that all arrangements necessary to support the continuity of critical shared services and/or material operational services and the effective execution of the transfer strategy are appropriately considered.</p> |

<sup>2</sup> Please refer to paragraph 3.3.5.2 of the OCIR Guidance Paper

<sup>3</sup> "Transferee" means any acquirer, bridge institution, or other recipient of all or any part of DTM's assets, liabilities, business or affairs, including the services, that are transferred pursuant to any resolution measure

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#### d. Other Feedback

| No. | Feedback Received                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Response by PIDM                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
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| 1.  | <p><b>Application of Proportionality</b></p> <p>Respondents sought clarification on:</p> <ul style="list-style-type: none"> <li>(a) the differentiation between OCIR expectations applicable to DTMs that are subject to the Full Requirements and those subject to Tailored Requirements;</li> <li>(b) whether smaller and less complex DTMs may be subject to a reduced scope of OCIR requirements; and</li> <li>(c) whether a phased implementation approach will be adopted, with implementation timelines and transition expectations clearly communicated.</li> </ul> | <p>PIDM wishes to clarify that DTMs that are subject to the Full Requirements are expected to comply with all requirements set out in Section 3 of the OCIR Guidance Paper. DTMs subject to Tailored Requirements are only required to comply with a reduced set of requirements<sup>4</sup> tailored to reflect their size and complexity.</p> <p>The OCIR Guidance Paper adopts a phased approach to demonstrating contractual resilience, allowing DTMs to prioritise material, unique and hard-to-substitute operational services.</p> <p>PIDM will communicate implementation timelines and transition expectations with sufficient lead time. This is to enable DTMs to plan their resources effectively and develop the required capabilities in an orderly manner.</p> |
| 2.  | <p><b>Industry Engagement and Implementation Support</b></p> <p>Respondents suggested that PIDM considers:</p> <ul style="list-style-type: none"> <li>(a) establishing an industry working group, particularly on contractual resilience, to discuss practical implementation issues under the OCIR framework; and</li> </ul>                                                                                                                                                                                                                                               | <p>PIDM acknowledges that continued engagement with industry is important to support the effective implementation of the OCIR framework. PIDM will continue to engage DTMs through industry briefings, bilateral engagements and other appropriate channels to clarify expectations</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |

<sup>4</sup> Refer to Sections 3.1 and 3.3 of the OCIR Guidance Paper



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|     | (b) conducting periodic industry briefings and issuing FAQs or case study publications to support consistent interpretation and implementation. | and address implementation issues as they arise. |

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