

Report on IT inspection at the Jyske Bank Group

1. Introduction

In December 2023, the Danish Financial Supervisory Authority (the FSA) conducted an IT inspection of the Jyske Bank Group. The inspection related to Jyske Bank's IT usage and IT risks. In this context, the FSA made an important observation in the IT risk management area.

2. Summary

According to the FSA Jyske Bank has shortcomings in its IT risk management. On this background, Jyske Bank received an order to ensure adequate management of the area.

Jyske Bank's risk management function does not exercise sufficient control in the IT risk area. The risk management function has only to a limited extent independently checked, assessed and reported on whether the IT security policy ensures adequate management of IT risk and whether the requirements for the IT security policy and underlying business procedures have been determined in accordance with the Executive Board's and the Supervisory Board's desired level of IT security¹.

In addition, the risk management function's control work is not sufficiently independent of the other control functions. Finally, the risk management function has not ensured sufficient progress in the implementation of methods, control plans and execution of verification controls².

¹ Executive Order No. 1103 of 30 June 2022 on Management and Control of banks, etc. S.1(3), cf. Appendix 5 Nos. 106 and 107.

² Executive Order No. 1103 of 30 June 2022 on Management and Control of banks, etc. S.1(3), cf. Appendix 7 Nos. 4, 6 and 17.

The shortcomings entail a risk that the reporting to management does not sufficiently allow management to assess the effectiveness of the established security measures in the IT risk area. In addition, inadequate IT risk management in the Risk Management function may result in lack of punctual independent monitoring and reporting of IT-related risks. Against this background, risks may not be properly addressed, such as the risk of disruptions in services to clients.

At the end of 2023, Jyske Bank had determined a capital add-on of DKK 120 million to cover increased risks in the IT area. Based on this investigation, the Danish FSA does not find any basis for setting aside Jyske Bank's capital add-on.