Date Filed: November 09, 2026

Witness: Christopher Leigh
Request from: Office of Consumer Counsel

Question:

(CYBERSECURITY) Please refer to the Response to OCC-768. There the Company indicated "Yes" to the question of if it had ever determined, through its vendor security review process, that a prospective or existing vendor's security controls or practices were insufficient; however, the Company answered the remaining of the question regarding only what "may" occur in such circumstances, not what did occur. Please indicate from 2018 to the present:

a. each incident in which the Company determined through its vendor security review process that a vendor's security controls or practices were insufficient;
b. what services that vendor provided;
c. what specific security deficiencies were identified;
d. whether the vendor was permitted to proceed or continue providing services; and
e. what specific action(s) the Company took in response.

Response:

The Company reviewed its Vendor Risk Management records for the period January 1, 2018 through the present to identify instances in which a prospective or existing vendor was determined through the vendor security review process to have security controls or practices that did not meet the Company's requirements. Please refer to OCC-988, Attachment 1 CONFIDENITAL, for the results of the Company's vendor assessments.

In each of the instances, the Company's Vendor Risk Management process identified the relevant concern through the due diligence review and resulted in the vendor either not proceeding with the contemplated engagement or being subject to additional requirements or conditions before the engagement could proceed.

The Company also identified vendor reviews during this period that were closed or classified as rejected for reasons other than a determination of inadequate cybersecurity controls, including vendor non-responsiveness and instances where the vendor was not ultimately selected. Those records have not been included in OCC-988, Attachment 1 CONFIDENIAL.