



# At the Global Intersection Of Strategy, Risk, and Regulation

PROMONTORY FINANCIAL GROUP





Regulatory oversight changes from border to border, but a consensus on appropriate standards and conduct is emerging among the leading financial jurisdictions around the world.

Companies that anticipate the changes to come have the best chance at meaningful success.

Promontory Financial Group is a global consulting firm whose more than 500 clients have included 19 of the 20 largest U.S. financial institutions and most of the world's largest financial services firms. We have advised worldwide on many of the most pressing issues in the financial services industry since former U.S. Comptroller of the Currency Gene Ludwig founded Promontory in 2001. We are valued for the expertise, insight, and integrity we bring to every engagement. Financial companies require no less to succeed in today's uncertain markets.

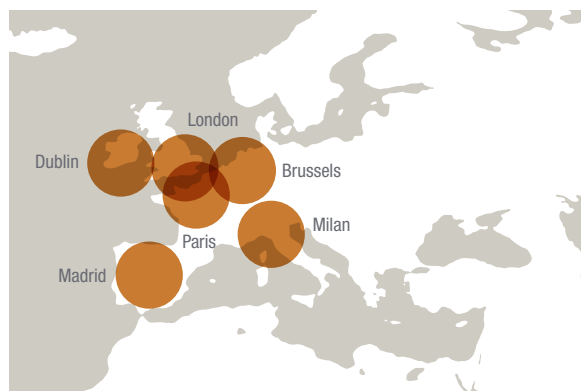
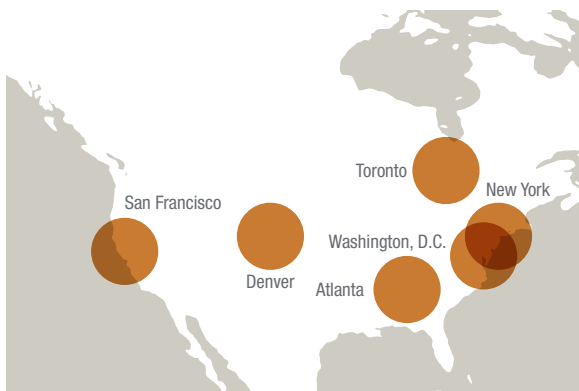
Our most productive client relationships start with the CEO and directors; we build relationships of trust in which we work closely with the decision-makers at the top of the firms we advise. Our clients range from large, complex financial institutions, to central banks, to credit unions and community lenders. We help firms worldwide resolve their toughest business challenges and meet obligations to their customers, employees, shareholders, and the public. Our experts in risk management, compliance, governance, internal and external audit, market, credit, and operational risk help our clients comply with governmental requirements.

Our work is both strategic and technical. We validate risk models, run stress tests, administer compliance reviews, and build or rebuild compliance systems. We recommend improvements to corporate governance, risk management, anti-money-laundering programs, capital and liquidity, and consumer protection. We analyze new banking rules and help our clients comply with them. We interpret regulatory orders, perform gap analyses, and help fix control weaknesses.

We emphasize solutions that adapt to local conditions, but fit into a cohesive, integrated framework that preserves the culture and values of each company. A company considering how to do business on the other side of the world can leverage our global network of professionals. Our team works collaboratively; a single point of contact puts to work the best minds in financial services consulting on delivering the right answer for our client.

# The toughest part about getting help is knowing whom to ask.

## Ask Promontory.



We rely on a strategic combination of former senior regulators and business executives to provide our clients with unmatched insight into financial services regulation, supervision, and enforcement. We do more than provide advice; we show our clients how to take action, we guide implementation, and we follow up to validate the effectiveness of actions taken.

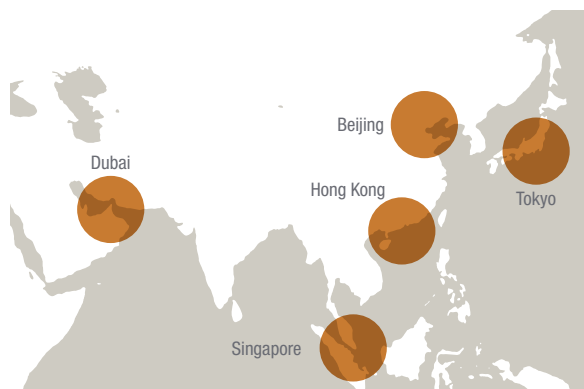
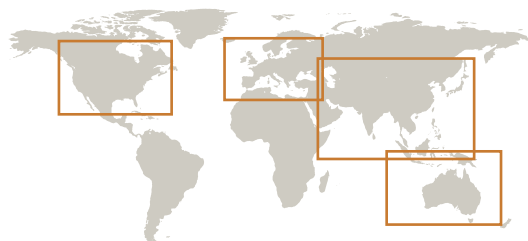
Our team includes former officials at seven U.S. financial regulatory agencies, five central banks, three state regulators, and the U.S. Department of the Treasury, as well as banking regulators in the United Kingdom, Hong Kong, Japan, Singapore, France, Australia, Canada, Italy, Lebanon, and Japan. It also includes former bank, insurance, and other financial services executives who have led companies in the U.S., Europe, and Asia, including the Middle East. Promontory operates seamlessly from 18 offices in 13 countries.

The moment a client requests our assistance, our entire senior team immediately initiates a global internal dialogue to quickly identify the right people to devise and implement the best possible solutions. This rapid, matrixed response is critically important to serve clients who are facing tight deadlines in

responding to regulatory or operational challenges or crises. Our engagements include assistance to government agencies and central banks, as well as to companies around the globe seeking the soundest advice on risk management, regulatory compliance, governance systems, and anti-money-laundering policies and procedures.

These types of engagements illustrate the breadth of our activities and emphasize a core strength: the global scope of our engagements and our ability to quickly mobilize our experts from anywhere in the world to tackle a client's issue. Our experience on one side of the world informs engagements on the other. We deliver custom solutions informed by best practices, and perfected through hundreds of engagements in multiple regional and regulatory jurisdictions.

# 18 Offices 13 Countries Global Perspective



## Who We Are

Promontory professionals are former senior regulators, financial services executives, and advisers; we rely upon experts with decades of experience to interpret regulatory requirements, as well as implement solutions to meet them. We stress innovation and creativity in answering our clients' toughest questions. We are unique in our ability to bring expert resources to bear with a minimum of bureaucracy and a maximum of efficiency, skill, and thoroughness.



## Presence

Promontory's global network includes offices in the world's largest financial centers. Our proximity can be a key element in solving problems. Companies seeking advice receive the care and attention of experts with intimate knowledge of the contours of regulation in each jurisdiction, informed by global best practices.

## Principles

Sustainable success depends upon mutual regard among employees, customers, shareholders, and regulators. The outlook is most favorable for companies that develop or build upon a culture that embraces ethical practices as the strongest foundation for business.

## Efficiency and Accessibility

We staff our engagements through highly scalable, flexible teams led by managing directors who know the value of a hands-on approach to project completion. Our inverted-pyramid structure means that our clients don't have to navigate through layers of less experienced analysts to gain access to our most experienced professionals.

# Regulatory and Subject-Matter Expertise

Promontory has unmatched regulatory and subject-matter expertise. Our professionals and advisers have previously served in senior policymaking and policy-implementing roles around the world.

## **Federal Reserve Board**

- Vice Chairman
- Director, Deputy Director, and Senior Examiners, Banking Supervision and Regulation Division

## **Office of the Comptroller of the Currency**

- Comptroller of the Currency
- First Senior Deputy Comptroller and Chief Counsel
- Chief National Bank Examiner
- Senior Deputy Comptrollers for Bank Supervision Policy, Capital Markets, Economic Affairs, and International Affairs
- Director of Risk Analysis Division
- Multinational Bank Examiner-in-Charge

## **Federal Deposit Insurance Corporation**

- Vice Chairman
- General Counsel
- Deputy General Counsel
- Deputy General Counsel of the Resolution Trust Corporation
- Deputy Directors, Division of Supervision and Consumer Protection and Division of Resolutions and Receiverships
- Regional Director, Atlanta Region

## **Securities and Exchange Commission**

- Chairman
- Assistant Director, Division of Enforcement
- Senior Counsel, Division of Enforcement

## **U.S. Congress**

- U.S. Senator
- Counsel to U.S. Senate Banking Committee

## **Executive Office of the President of the United States**

- Director for Federal Cybersecurity Policy, National Security Staff
- Executive Director, White House Business Council

## **Financial Stability Oversight Council**

- Member Representing State Banking Supervisors

## **U.S. Department of the Treasury**

- Deputy Assistant Secretary, Critical Infrastructure and Compliance

## **Federal Reserve Bank of San Francisco**

- EVP for Banking Supervision and Regulation

## **Federal Reserve Bank of New York**

- EVP, Bank Supervision
- SVP, Financial Institution Supervision Group
- VP and Head of Operational Risk
- VP and Head of Risk and Policy and Credit Risk Management
- Senior Examiners

## **New York State Banking Department**

- Superintendent of Banks

## **California Department of Financial Institutions**

- Commissioner

## **Worldwide**

- Chairman, U.K. Financial Services Authority
- Managing Director, U.K. Financial Services Authority
- Executive Director for Banking Supervision, Bank of England
- Governor, Bank of Thailand
- Governor, Bank of Japan
- Chief Bank Supervisor, Bank of Japan
- Deputy Governor, Bank of Canada
- Chairman, Australian Prudential Regulation Authority
- Chairman, Senior Supervisors Group
- Multiple members and subcommittee chairpersons of the Basel Committee on Banking Supervision

# Optimally Balanced Service Offerings



## Expertise

- Anti-Money-Laundering/ Counter-Terrorism Financing
- Asset-Liability Management and Liquidity Planning
- Capital Planning and Analysis
- Consumer Protection
- Credit Services
- Due Diligence
- Examination and Enforcement
- Financial Benchmarks
- Governance and Controls
- Information Security and Cyberrisk Management
- Internal Audit Assistance and Assessment
- Investigations and Forensic Reviews
- Living Will and Resolution Planning
- Mortgage Compliance Services
- Privacy and Data Protection
- Regulatory and Strategic Policy Advice
- Risk Management
- Transaction Support and Regulatory Applications
- Securities and Other Financial Products
- Stress Testing and Model Validation
- Training Solutions
- Vendor Oversight



## Industry Sectors

- Asset Management
- Depository Institutions
- Finance Companies
- Government, Agency, and Association
- Insurance
- Market Infrastructure
- Retail Payments Providers
- Securities and Derivatives



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