



TVRM Executive Risk Summary

ADESYNET S.A.C (PR) (6927)

SUPPLIER:

Supplier:	ADESYNET
Supplier Location:	Av. Sta. Rosa 130, Los Olivos 15304, Peru
Name and Email of Person Completing Survey:	Hebert Carranza;hebert@adesynet.com

OVERVIEW:

Description:	This vendor is responsible for ADESYNET (POS) system. The ADESYNET POS system supports the sales process and billing, over the NEOSALUD Drugstore Retail in Peru (12 locations). Provider is known locally with the same Product name and is the integrating management of the point of sale, back office operations, warehouse and all aspects of the Stores as Retail solution, this includes technical support services post implementation. The potential level of impact to customers is related to delay in result. The services are rendered for EPD Peru and all its subsidiaries.
Intended Use:	This vendor is responsible for ADESYNET (POS) system. The ADESYNET POS system supports the sales process and billing, over the NEOSALUD Drugstore Retail in Peru (12 locations). Provider is known locally with the same Product name and is the integrating management of the point of sale, back office operations, warehouse and all aspects of the Stores as Retail solution. The services are rendered for EPD Peru and all its subsidiaries.

PRODUCTS OR SERVICES ASSESSED:

Product/Service Type:	Managed Services
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Product or Service:	Owning Division:	Division(s)/Affiliate(s) Using:		
ADESYNET S.A.C (PR)	EPD	EPD	N/A	N/A

RISK PROFILE AND RATINGS:

In accordance with requirements of BTSQC11.01.001 Technology Vendor Risk Management Procedure, section 6.2.4.

Inherent Risk Rating:	Overall Risk Assessment Rating*:	Residual Risk Rating:
Medium	Partially Effective	Medium

*Note: Overall Risk Assessment Rating is applicable only for those assessments where Due Diligence was initiated on or after 10-Nov-2022.



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Risk Dimensions in Scope:	Access Control Application Security Asset Management Business Continuity Management Communication Security Compliance and Organizational Security Cryptography Data Privacy Human Resource and Policies Physical and Environmental Security System Acquisition Dev and Maintenance
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PERIODIC REVIEW SCHEDULE:

Periodic Review Required? (Y/N):	Yes	Periodic Review Frequency:	3 Years	Next Periodic Review Date:	2027
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CONTROL EFFECTIVENESS RATINGS:

Due Diligence Questionnaire (DDQ) ID:	DDQ-4731	DDQ Initiated Date:	03/Jun/2024	Review Date:	31/Jul/2024
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Control Effectiveness Ratings Table A: Applicable if DDQ Initiated Date is on or after 10-Nov-2022:

Access Control	Application Programming Interface (API) Security	Application Security	Asset Management	Business Continuity Management	Cloud Security	Communication Security
Not Applicable	Not Applicable	Partially Compliant	Non-Compliant	Non-Compliant	Not Applicable	Partially Compliant

Compliance & Organizational Security	Cryptography	Data Privacy	Electronic Records; Electronic Signatures (ERES)	Human Resources & Policies	IT Operations
Non-Compliant	Not Applicable	Non-Compliant	Not Applicable	Non-Compliant	Not Applicable

Payment Card Industry (PCI)	Physical & Environmental Security	Quality	System Acquisition Development & Maintenance	Subcontractors	Vendor Cyber Risk Assessment
Not Applicable	Partially Compliant	Not Applicable	Compliant	Not Applicable	Not Applicable

Findings				Total:
Critical: 0	High: 1	Medium: 9	Low: 4	14

The following findings were identified during the review of the Due Diligence Questionnaire and/or Onsite/Desktop Audit, if applicable. Reference listed is the section in the Due Diligence Questionnaire or documentation.

#	Reference	Description	Rating: (C, H, M, L)	Vendor Response
ISS-15654	PES-1, 2	<ol style="list-style-type: none"> The organization does not have a documented physical and environmental security policy in place. The organization has not provided the details of an access control system for the organization's physical security (entry point). <p>Potential Implication: Inadequate controls and lack of function to protect critical external facility infrastructure components may result in a compromised network, theft/loss of information and/or</p>	Medium	<p>PES-1-TPR- Not Applicable</p> <p>PES-1-TPC- We are a small company that operates primarily in a digital environment, with a small team and without the need for a group dedicated exclusively to physical or environmental security.</p> <p>PES-2-TPR- Not Applicable</p>



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		failure of day-to-day business activities supported by affected systems. Further, potential exposure of Abbott information to unauthorized parties.		PES-2-TPC- Our company operates in a standard office environment with no loading and unloading areas or sensitive facilities that require strict physical access controls. We do not carry out industrial or logistical activities that involve the management of inventories or materials that need specific physical protection.
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ISS-15655	PES-9	<p>1. The organization has not defined standard regarding the working conditions for personnel.</p> <p>Potential Implication: Poor workplace conditions can lead to unmotivated employees, poor productivity, and an increased risk of workplace incidents.</p>	Low	<p>TPR- No</p> <p>TPC- We have a team of employees who primarily perform administrative, consulting, or service-related tasks that are not subject to significant workplace health or safety risks. Therefore, we have not established a specific standard for working conditions or a process for personal injury incidents.</p>
ISS-15656	AS-6	<p>1. Organization's application does not automatically log users out after a period of inactivity, including remote sessions.</p> <p>Potential Implication: Inadequate mechanisms and system configurations for controlling access to information assets may expose information to unauthorized access and/ or potential security threats from users overriding system and application controls.</p>	Low	<p>TPR- No</p> <p>TPC- The application does not have this functionality since it is a desktop client-server architecture.</p>
ISS-15657	AM-1, 2, 4	<p>1. The organization does not have a defined, documented, and approved asset management policy and/or supporting procedure which includes processes for labelling information assets.</p> <p>2. The organization does not have a process to maintain an up-to date inventory of assets.</p> <p>3. The organization does not have a process to periodically review for unauthorized, unlicensed, and unsupported hardware/software.</p> <p>Potential Implication: Lack of Asset Management policy may lead to inappropriate asset classification and management which may lead to potential loss of Abbott's data. Further, the informational assets not so inventoried may not be adequately safeguarded</p>	Medium	<p>AM-1-TPR- No</p> <p>AM-1-TPC- Our company is small in size, with a specific focus on the development and support of business management software. Due to our scale and operational structure, we do not require a formal asset management policy that includes detailed labeling and documentation of all information assets.</p> <p>AM-2-TPR- Not Applicable</p> <p>AM-2-TPC- Our business model</p>



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		from unauthorized modification or mishandling, resulting in potential legal exposures. Also, assets may not be appropriately tracked. license compliance, regulatory compliance, and security related to the assets may be impacted.		involves providing software solutions as a service to our clients. We do not manage an extensive hardware infrastructure or a wide variety of software in our facilities, which reduces the need to maintain a detailed and up-to-date inventory. AM-4-TPR- Not Applicable AM-4-TPC- Our business does not involve the management of Abbott-related assets that require this type of reporting, as we do not have software that involves licenses or contractual relationships with Abbott in terms of monitoring unauthorized assets.
ISS-15658	AM-3	<ol style="list-style-type: none"> 1. The organization does not have a defined, documented, and approved acceptable use policy for information and associated assets. <p>Potential Implication: Lack of Acceptable Use policy may lead to unauthorized access and disclosure of sensitive information to unauthorized personnel which may result in legal implications.</p>	Medium	<p>TPR- Not Applicable</p> <p>TPC- Our company is exclusively dedicated to software development and the provision of related services. We do not store or handle confidential or sensitive information of third parties, beyond the data necessary for the operation of our systems and the provision of services to our clients.</p>
ISS-15659	BCM-1, 2	<ol style="list-style-type: none"> 1. The organization does not have a companywide Business continuity and Disaster recovery plans. 2. The organization does not have an oversight program to ensure the quality of business continuity plans. <p>Potential Implication: Lack of Business Continuity procedures may</p>	Medium	<p>BCM-1-TPR- No</p> <p>BCM-1-TPC- Our current business continuity efforts are primarily focused on making regular backups of development sources</p>



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		result in an inability to provide services in the event of an incident and may result in loss of data or services. Also, in the absence of periodic testing of business continuity and disaster recovery plans, it may not be up to date and effective when required, which may result in an inability to provide services in the event of an incident and may result in loss of data or services.		and administrative documentation. These backups are implemented to ensure the availability and integrity of our critical assets in the event of incidents that may affect operational continuity. BCM-2-TPR- No BCM-2-TPC- As we mentioned above, our company does not currently have formal business continuity and disaster recovery plans. Our approach is limited to making regular backups of development sources and administrative documentation.
ISS-15660	BCM-3	<p>1. The organization does not consider Recovery Time Objective (RTO) and Recovery Point objective (RPO) element when developing a business continuity plan.</p> <p>Potential Implication: Lack of established Recovery Time Objective (RTO) and Recovery Point Objective (RPO) may result in the plans failure to recover business processes when required and critical business operations suffering a potential disruption following an interruption.</p>	Low	<p>TPR- No</p> <p>TPC- In our case, we do not maintain direct control over the infrastructure where critical databases for Abbott are hosted. These databases are under Abbott's management and recovery policies, including its own Recovery Time Objectives (RTO) and Recovery Point Objectives (RPO). Therefore, we do not have an internal process to define or manage these objectives, as Abbott handles these considerations as part of its own infrastructure and data management.</p>



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ISS-15661	BCM-4	<p>1. The organization does not have a process to maintain communication with clients, business partners, and shareholders during the time of crisis.</p> <p>Potential Implication: It may lead to contractual exposure in this regard.</p>	Low	<p>TPR- No</p> <p>TPC- Because the company is small and has a limited number of business partners (only two, as mentioned), it is not considered necessary to establish a formal crisis management process to communicate with them specifically.</p>
ISS-15662	CO-2	<p>1. The organization does not have a process to monitor and comply with additions and changes to regulatory requirements.</p> <p>Potential Implication: In absence of a process to ensure compliance with information security privacy regulations (e.g. intellectual property rights, cryptographic control, protection, and privacy of personal information), the entity may be at a risk of non-compliance with regulations, and disruptions to their business operations. This could have an impact on Abbott's reputation and finances.</p>	Medium	<p>TPR- No</p> <p>TPC- Adesy.net is a small company focused on software development and does not have a formal process in place to monitor and comply with additions and changes to regulatory requirements. The company has limited resources and a small staff, which prevents the establishment of an inventory of applicable laws, rules and regulations.</p>
ISS-15663	HR-1, 2, 5, 6 CO-3, 4,	<p>1. The organization does not have a human resource policy.</p> <p>2. The organization does not have an onboarding/ hire process policy/procedure.</p> <p>3. The organization does not require new hires to sign agreements pertaining to non-disclosure, confidentiality, acceptable use, code of conduct, etc.</p> <p>4. The organization does not have an off-boarding policy.</p> <p>5. The organization does not provide security compliance training for employees.</p> <p>6. The organization does not have a process for staff disciplinary actions.</p>	High	<p>HR-1-TPR- No</p> <p>HR-1-TPC- Although we implement basic security practices, we do not have a formally documented human resources policy. We conduct pre-employment background checks, establish clear guidelines for handling sensitive information during employment, and revoke access upon termination of</p>



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		<p>Potential Implication: Without a formal HR policy and procedure, the entity will be unable to manage their employee security risks and safeguard information system assets in the organization.</p>		<p>employment. However, these practices are handled informally and are not officially documented due to the size of our company. HR-2-TPR- No HR-2-TPC- We do not have a documented incorporation policy and procedure. However, we carry out background validations through calls to previous jobs, we comply with the hiring and entry into the payroll according to legal requirements, we formalize the hiring by signing a contract, we provide induction to the assigned position, and we monitor initial performance. All these steps are carried out in an undocumented manner. HR-5-TPR- No HR-5-TPC- We currently do not require specific training in safety standards and procedures for new employees or contractors. Our training programs are focused on areas such as leadership and customer service, which we consider to be the highest priority for the development and operation of our small business. HR-6-TPR- No HR-6-TPC- We do not have a</p>
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				<p>defined and documented termination policy and procedure for terminated employees and contractors. However, we handle the withdrawal process internally following common practices such as deactivating access and returning equipment.</p> <p>CO-3-TPR- Not Applicable</p> <p>CO-3-TPC- Due to small business regulations and the number of employees, Adesy.net is not required to conduct security training. The company operates with a compact structure and focuses on meeting basic security requirements through daily operational practices and the implementation of essential security measures.</p> <p>CO-4-TPR- No</p> <p>CO-4-TPC- At Adesy.net, due to its structure as a small company, the handling of non-compliance and disciplinary actions of personnel is based on practice and direct communication to manage and resolve behavioral or performance problems.</p>
ISS-15664	CO-5, 7	1. The organization does not conduct an annual independent audit to ensure IT services are securely provided to customers and in accordance with industry standards.	Medium	<p>CO-5-TPR- No</p> <p>CO-5-TPC- Adesy.net does not conduct annual independent</p>



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		<p>2. The organization does not have an internal audit and compliance departments that govern policies, procedures, and regulations.</p> <p>Potential Implication: In absence of annual independent audit (SAS16, SAS70, ISO 27001, etc.), the entity may be at a risk of non-compliance with regulations and lapse in secure provision of services to customers. This could have an impact on Abbott's reputation and finances. Also, non-compliance with information security policies may not be identified thus potentially leading to security incidents.</p>		<p>audits due to its size, structure, and financial limitations. The company focuses on internal management and basic security processes to ensure the quality and security of its IT services.</p> <p>CO-7-TPR- No</p> <p>CO-7-TPC- Adesy.net does not have internal audit and compliance departments due to the nature and size of our company. We are a small software development company and, therefore, our operations do not require the implementation of complex organizational structures such as internal audit and compliance departments. All relevant policies and procedures are managed directly by management and the development team.</p>
ISS-15665	CO-11, 12	<p>1. The organization does not have an information security policy.</p> <p>2. The organization does not have a dedicated information security personnel that govern information security functions.</p> <p>Potential Implication: In the absence of a formally defined policy and related procedures and guidelines, information security control requirements may not be communicated and implemented appropriately. Also, absence of a designated individual responsible for delivery of information security objectives may lead to lack of accountability.</p>	Medium	<p>CO-11-TPR- No</p> <p>CO-11-TPC- since as a desktop software development company, we do not store sensitive customer information. Our approach focuses on code and source security, rather than sensitive user data.</p> <p>CO-12-TPR- No</p> <p>CO-12-TPC- We do not have personnel dedicated exclusively to information security. Security</p>



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				functions are integrated into the overall responsibilities of the development and administration team.
ISS-15666	DP-1, 2	<ol style="list-style-type: none"> 1. The organization does not have a procedure to process data fairly and provide individuals with information about how and why personal data is used through defined and documented data privacy policies and notices. 2. The organization does not have a procedure to limit the processing of Abbott's personal data strictly on Abbott's behalf and only in a manner that is necessary to perform and comply with the services under the agreement. <p>Potential Implication: Inadequate data protection and privacy processes for disclosure, reuse, access, modification, use/printing, displaying of personal information and to train customer service agents to not enter confidential information into fields that can be viewed without appropriate authorization may result in violations of customer privacy laws and regulations.</p>	Medium	<p>DP-1-TPR- No</p> <p>DP-1-TPC- At our small business, the primary focus is software development, and we do not handle or store sensitive personal data of our customers on our premises. Therefore, we have not implemented formal data privacy policies.</p> <p>DP-2-TPR- No</p> <p>DP-2-TPC- Our company focuses on software development, and we do not store or process personal data of our clients in our facilities.</p>
ISS-15667	DP-5	<ol style="list-style-type: none"> 1. The organization does not have a process to perform data protection impact assessments or privacy impact assessments as required by law and assist Abbott as necessary in performing one as necessary in instances where the company processes Abbott's personal data. <p>Potential Implication: Inadequate data protection and privacy processes for customer access of personal information may result in the violations of customer privacy laws and regulations.</p>	Medium	<p>TPR- No</p> <p>TPC- No, we do not conduct data protection impact assessments because we do not process Abbott personal data. Our focus is exclusively on software development, not data management.</p>



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CONCLUSION: In accordance with requirements of BTSQC11.01.001, Technology Vendor Risk Management Procedure, section 6.2.4 Vendor Risk Ratings and excluding any nonconformity identified. Findings with rating of Critical, High or Medium should be investigated by the vendor with Action plans reviewed by IT Vendor Risk Management and Business Owner/BRM.



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Reviewed by: (Business Owner or Designate)

I have reviewed the Executive Summary, including the results of the assessment activities completed, and accept the results. I understand that any findings that require Abbott to take any action are the responsibility of the project and/or operations team. The business owner/designate is responsible for ensuring that the vendor completes any required remediation resulting from this assessment.

Per BTSQC11.01.001, section 6.2.5, the final Executive Risk Summary must be acknowledged and accepted at the appropriate leadership level, based on the residual risk as listed in the table below:

Residual Risk	Acceptance Level
Critical	Reporting Manager of DVP (i.e., VP, SVP, or EVP)
High	DVP
Medium	BRM or equivalent IT Leader
Low	Business Owner/ BRM


Benavides, Alba	Regional Applications Manager	<div>Signed by: Alba Benavides</div> <div> Signer Name: Alba Benavides Signing Reason: I approve this document Signing Time: August 8, 2024 3:20:43 PM CDT 153EC65171464BD89A0BD11CB423A1EA</div>
Printed Name	Title	Signature/ Date (electronically captured or DD-MMM-YYYY)



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Executive Summary Verified by: (TVRM Representative)

I have reviewed the Executive Summary and the outcome and results.

Mpianing, Stephanie	VRM Analyst	<div>Signed by: <i>Stephanie Mpianing</i></div> <div> Signer Name: Stephanie Mpianing Signing Reason: I approve this document Signing Time: August 8, 2024 8:20:55 AM CDT 1D3C674F5FA6499995CA06795BBFC244</div>
Printed Name	Title	Signature/ Date (electronically captured or DD-MMM-YYYY)

Executive Summary Reviewed by: (Authoring TVRM)

I have reviewed the Executive Summary and the outcome and results.

Frank, Gary	Senior Specialist IT Quality	<div>Signed by: <i>Gary Frank</i></div> <div> Signer Name: Gary Frank Signing Reason: I have reviewed this document Signing Time: August 8, 2024 9:20:51 AM PDT CA464DB41F534C99A9EEE8A8999776E1</div>
Printed Name	Title	Signature/ Date (electronically captured or DD-MMM-YYYY)



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References:

Documents and/or Records Reviewed:

Reference	Title	Version or Date
IRQ-5892	Inherent Risk Questionnaire (IRQ)	31/May/2024
DDQ-4731	Due Diligence Questionnaire (DDQ)	31/Jul/2024

Document History:

Version:	By:	Date:	Description:
1.0	Mpianing, Stephanie	31/Jul/2024	Final

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In Person Signer Events	Signature	Timestamp
Editor Delivery Events	Status	Timestamp
Agent Delivery Events	Status	Timestamp
Intermediary Delivery Events	Status	Timestamp
Certified Delivery Events	Status	Timestamp
Carbon Copy Events	Status	Timestamp
Witness Events	Signature	Timestamp
Notary Events	Signature	Timestamp
Envelope Summary Events	Status	Timestamps
Envelope Sent	Hashed/Encrypted	8/6/2024 1:48:38 PM
Certified Delivered	Security Checked	8/8/2024 1:19:34 PM
Signing Complete	Security Checked	8/8/2024 1:20:51 PM
Completed	Security Checked	8/8/2024 1:20:51 PM
Payment Events	Status	Timestamps
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- You can print on paper this Electronic Record and Signature Disclosure, or save or send this Electronic Record and Disclosure to a location where you can print it, for future reference and access; and
- Until or unless you notify Abbott as described above, you consent to receive exclusively through electronic means all notices, disclosures, authorizations, acknowledgements, and other documents that are required to be provided or made available to you by Abbott during the course of your relationship with Abbott.