Organizational Resilience

Topical Requirement

User Guide

The Institute of Internal Auditors

Contents

Overview of Topical Requirements

Topical Requirements are an essential component of the International Professional Practices Framework® along with the Global Internal Audit Standards™ and Global Guidance. The Institute of Internal Auditors requires the Topical Requirements to be used in conjunction with the Global Internal Audit Standards (Standard 4.1 Conformance with the Global Internal Audit Standards), which provide the authoritative basis of the required practices. References to the Standards appear throughout this guide as a source of more detailed information.

Topical Requirements formalize how internal auditors address prevalent risk areas to promote quality and consistency within the profession. The Internal Audit Mandate clearly defines the scope and types of services undertaken by the internal audit function, including consideration of Topical Requirements (Standard 6.1 Internal Audit Mandate). Topical Requirements establish a baseline and provide relevant criteria for performing assurance services related to the subject of a Topical Requirement (Standard 13.4 Evaluation Criteria). Conformance with Topical Requirements is mandatory for assurance services and recommended for evaluation during advisory services. Topical Requirements are not intended to cover all potential aspects that should be considered when performing assurance engagements; rather, they are intended to provide a minimum set of requirements to enable a consistent, reliable assessment of the topic.

Topical Requirements clearly link to The IIA's Three Lines Model and the Standards. Governance, risk management, and control processes are the main components of Topical Requirements, aligning with Standard 9.1 Understanding Governance, Risk Management, and Control Processes. In reference to the Three Lines Model, governance links to the board/governing body, risk management links to the second line, and controls or control processes link to the first line. While management is represented in both the first and second lines, the internal audit function is depicted in the third line as an independent and objective assurance provider, reporting to the board/governing body (Principle 8 Overseen by the Board).

Applicability, Risk, and Professional Judgment

Topical Requirements must be followed when internal audit functions perform assurance engagements on subjects for which a Topical Requirement exists or when aspects of the Topical Requirement are identified within other assurance engagements.

As described in the Standards, assessing risk is an important part of the chief audit executive's planning. Determining the assurance engagements to include in the internal audit plan requires assessing the organization's strategies, objectives, and risks at least annually (Standard 9.4 Internal Audit Plan). When planning individual assurance engagements, internal auditors must assess risks relevant to the engagement (Standard 13.2 Engagement Risk Assessment).

When the subject of a Topical Requirement is identified during the risk-based internal audit planning process and is included in the audit plan, then the requirements outlined in the Topical Requirement must be used to assess the topic within the applicable engagements. In addition, when internal auditors perform an engagement (either included or not included in the plan) and elements of a Topical Requirement emerge, the Topical Requirement must be assessed for applicability as part of the engagement. Lastly, if an engagement is requested that was not originally in the plan and includes the topic, the Topical Requirement must be assessed for applicability. (See Standard 9.4 regarding changes to the audit plan).

Professional judgment plays a key role in applying the Topical Requirement. Risk assessments drive chief audit executives' decisions about which engagements to include in the internal audit plan (Standard 9.4). Additionally, internal auditors use professional judgment to determine which aspects will be covered in each engagement (Standards 13.3 Engagement Objectives and Scope, 13.4 Evaluation Criteria, and 13.6 Work Program) and to identify the resources necessary to achieve the engagement objectives (Standard 13.5 Engagement Resources). Appendix A, "Application Scenarios," describes how internal auditors use the Topical Requirement.

Not all individual requirements may apply to every engagement, and some may be fulfilled through other approaches. If a requirement is excluded or superseded by other regulatory or contractual requirements or addressed through implementation of procedures in conformance with the Standards, the rationale must be documented and retained. Conformance will be evaluated during quality assessments.

Conformance with the Topical Requirement must be documented using auditors' professional judgment as described in Standard 14.6 Engagement Documentation.

While the Organizational Resilience Topical Requirement provides a baseline of control processes to consider, organizations that evaluate the risk topic as very high may need to assess additional aspects.

If a chief audit executive determines that the internal audit function does not have the required knowledge to perform audit engagements on a Topical Requirement subject, the engagement work may be contracted with an external service provider (Standards 3.1 Competency, 7.2 Chief Audit Executive Qualifications, 10.2 Human Resources Management). Chief audit executives may find The IIA's Internal Auditing Competency Framework™ a helpful resource. The Standards apply to any individual or function that provides internal audit services, whether an organization employs internal auditors directly, contracts them through an external service provider, or both. The chief audit executive retains the ultimate responsibility for ensuring conformance. In addition, if the chief audit executive determines internal audit resources are insufficient, the chief audit executive must inform the board about the impact of insufficient resources and how any resource shortfalls will be addressed (Standard 8.2 Resources).

Performance, Documentation, and Reporting

When applying Topical Requirements, internal auditors also must conform with the Standards, conducting their work in alignment with Domain V: Performing Internal Audit Services. The standards in Domain V describe planning engagements (Principle 13 Plan Engagements Effectively), conducting engagements (Principle 14 Conduct Engagement Work), and

communicating engagement results (Principle 15 Communicate Engagement Results and Monitor Action Plans).

Topical Requirements are designed to support consistent and high-quality internal audit practices. They are to be applied in conjunction with applicable local laws, regulations, supervisory expectations, and other professionally recognized frameworks, which may impose additional or more specific requirements. Internal auditors may have already developed engagement work programs and testing procedures based on these regulations and frameworks. Internal auditors should reconcile their intended organizational resilience control testing and any reliable testing provided by other internal and external assurance providers (Standard 9.5 Coordination and Reliance) to the Topical Requirement to ensure adequate coverage.

Coverage of the Topical Requirement can be documented in either the internal audit plan or the engagement work program based on auditors' professional judgment. One or more internal audit engagements may cover the requirements. In addition, not all requirements may be applicable. Evidence that the Topical Requirement was assessed for applicability must be retained, including a rationale explaining any exclusions.

The optional tool in Appendix D can be used as a reference and to document internal auditors' work.

Quality Assurance

The Standards require the chief audit executive to develop, implement, and maintain a quality assurance and improvement program that covers all aspects of the internal audit function (Standard 8.3 Quality, Standard 8.4 External Quality Assessment, Standard 12.1 Internal Quality Assessment). The results must be communicated to the board and senior management. Communications must report on the internal audit function's conformance with the Standards and achievement of performance objectives.

Conformance with Topical Requirements should be considered in supervisory activities at the engagement level (Standard 12.3 Oversee and Improve Engagement Performance) and will be evaluated in quality assessments. To prepare for a quality review, internal auditors may use the tool provided in Appendix D.

Organizational Resilience

Organizational resilience refers to an organization's capacity to withstand and adapt to change, especially during times of disruption. According to the ISO 22316 framework from the International Organization for Standardization, it is defined as the "ability of an organization to absorb and adapt in a changing environment." While this definition establishes a clear aspiration, in practice, organizations vary widely in how they anticipate, respond to, adapt to, and recover from change and disruption. Because organizational resilience spans strategic, operational, technological, human, social, and financial dimensions, some organizations can absorb change effectively, whereas others struggle to do so or may choose different approaches in the face of uncertainty.

In practical terms, resilient organizations are better positioned to survive unexpected challenges and evolve and thrive when faced with them.

Numerous disruptions may prevent an organization from achieving its strategic goals and objectives, including, but not limited to:

- Natural disasters, such as earthquakes, fires, flooding, hurricanes, tsunamis, tropical storms, and other extreme weather events.
- Cyberattacks, such as ransomware, malware, denial of service, data breaches, insider threats, and other malicious actions intended to harm an organization or impede it from conducting operations.
- Geopolitical conflicts, such as economic sanctions, tariffs, terrorism, war, and other conflicts between nations.
- Environmental pressures, such as resource scarcity, public health crises, sustainability factors, or climate change.
- Shifting external factors, such as evolving technology (including artificial intelligence), changes in compliance (legal, regulatory, and financial reporting), employment levels, consumer demand, and reputation.
- Financial challenges, such as inflation or deflation, interest rates, currency exchange rates, and prevailing market conditions, such as recession or economic expansion.
- Operational challenges, such as complex processes, high reliance upon third parties, geographic location, cultural challenges, limited workforce availability, and ineffective leadership or risk management.
- Supply chain issues, such as the inability to source raw materials, a lack of diverse suppliers, and volatile commodity pricing.
- Internal events, such as key employee turnover and operational errors.

While the nature of the disruptive event may vary, the organization should have a well-defined resilience strategy and formalized processes to continuously anticipate, prepare for, respond to, and adapt to change. Organizational resilience is an umbrella term, and the strategy may include various components depending on the organization, such as business continuity, disaster recovery, critical function matrices, succession plans, and recovery tests.

Requirements of the Organizational Resilience Topical Requirement include:

- **Governance** – clearly defined baseline resilience objectives and strategies that support achievement of the organization's mission and vision.
- **Risk management** – processes to identify, analyze, manage, and monitor resilience threats, including a process to escalate resilience incidents promptly.
- **Controls** – management-established, periodically evaluated control processes to address resilience risks.

Considerations

Internal auditors may use the following considerations to aid their assessment of the requirements in the Organizational Resilience Topical Requirement. The lettering of each consideration is cross-referenced to its corresponding requirement in the Topical Requirement. These considerations are illustrative but not mandatory. Internal auditors should rely on professional judgment when determining what to include in their assessments.

Restrictions in public sector internal audit engagements due to legislation, government structure, or political environments are recognized as potential barriers to addressing certain aspects of this work. Internal auditors in the public sector should document such scope limitations as part of their risk assessment process and apply professional judgment to clearly define and communicate the tailored scope of their review.

Governance Considerations

To assess how the governance processes are applied to resilience objectives, internal auditors may review evidence of:

A. A documented resilience strategy established by management and approved and overseen by the board. It is formally communicated to all personnel and closely aligns with and supports the organization's mission, vision, culture, and risk management approach. The resilience strategic plan objectives are approved by the board, align with the organization's overall approach to risk management, and are periodically tested and reviewed. The plan may include operational, technological, and financial elements, such as:

   - Operational – resilience coordination across the organization; resilience risk assessment processes; business continuity planning that includes periodic testing and reporting; crisis management; workforce adaptability (such as remote-surge capacity, minimum on-site staffing, and cross-training coverage for critical roles); succession planning for vital personnel; supply chain resilience; establishment of key performance indicators (KPIs); and training for board members to ensure awareness.
   - Technological – IT infrastructure requirements; identification of critical data (data classification); data backups; cybersecurity hardening and threat monitoring; maintenance of critical technology assets; and defined recovery point objective (RPO) and recovery time objective (RTO) for critical data (validated through restore testing).
   - Financial – budgeted funds allocated to resilience; cash reserves to maintain operations during disruption; financial reporting processes to accurately capture

transactions related to disruption; insurance policies to mitigate disruption risks; and availability of credit lines for emergency borrowing.

B. Periodic (such as monthly or quarterly) updates on resilience are provided to the board by the person or team that leads organizational resilience, which may include defined risk tolerance triggers, KPIs, or other information to indicate observations or trends. Updates communicate the status of organizational resilience strategy objectives, including strategic oversight, monitoring, and long-term planning. Reporting may include monitoring results on the:

- Achievement of strategic resilience objectives and challenges that may impede achievement.
- Budgetary needs to support resilience goals and objectives, such as technology asset requirements.
- Status of resilience risks, including any significant changes in the resilience risk environment that would impact established risk tolerance levels.
- Effectiveness of resilience internal controls, including remediation progress.
- KPIs to measure resilience success.
- Human resources needed to hire, train, and develop personnel with resilience responsibilities.

C. Policies, procedures, and other relevant documentation used to manage operational, technological, and financial resilience processes, including:

- How critical resilience processes are identified and periodically analyzed to determine if the processes continue to accurately reflect the most vital processes.
- Policies are reviewed and updated at least annually (or more frequently based on a higher risk level), and more frequently as required for emerging resilience risks or based on lessons learned from testing or actual disruptive events.
- A review process on the sufficiency of policies and procedures to support resilience operations.
- If resilience processes and internal controls are strengthened using widely adopted frameworks for related processes, such as risk management, information technology, or governance. Examples that may be beneficial to consider include from organizations such as NIST, COSO, or ISO, specifically ISO 22300 series (22316 or 22336).

D. An established and documented incident command structure that describes leadership roles and responsibilities related to achieving resilience objectives. Evidence of established decision-making hierarchies, such as personnel responsible for resilience-related decisions during disruption, and the approvals required for operational decisions, such as the disbursement of funds or the ability to legally contract with a third party to assist the organization during disruption. Other considerations include documented escalation paths and temporary decision-making authorities during disruption, including financial delegation and third-party contracting thresholds.

E. An established process to periodically (such as annually or semi-annually) assess the knowledge, skills, and abilities of the individuals responsible for operating and managing organizational resilience processes. The process may include identification of training programs, such as live or virtual learning, conferences, on-demand courses, or professional certifications. Evidence of succession planning to identify key resilience roles, including scenario testing to identify activities that can only be performed by one person or a limited number of individuals. The qualifications for replacements are outlined.

F. An established process to identify, prioritize, and engage relevant internal and external stakeholders, as appropriate, in setting up information and reporting structures to identify and respond to existing vulnerabilities and emerging threats that could affect the achievement of organizational resilience objectives. Evidence of stakeholder participation in discussions of resilience vulnerabilities. Evidence may be emails, meeting minutes, or reports, including indications of the use of enterprisewide metrics to measure and monitor resilience effectiveness.

Risk Management Considerations

To assess how risk management processes are applied to organizational resilience objectives, internal auditors may review evidence that:

A. The organization's risk assessment and risk management processes include identifying organizational resilience risks and are performed on a continuous basis and documented, with results communicated across the organization. The resilience risk management process includes evaluating key processes, such as operations, enterprise risk management, IT, supply chain/procurement, facilities, human resources, finance, legal, compliance, regulatory, public relations, critical vendors, reputation, emerging risks, and others. In addition to identifying resilience risks, the processes include assessing how threats and vulnerabilities that could disrupt business operations are:
   - Initially identified and reported.
   - Analyzed to evaluate the risk of achieving organizational objectives.
   - Mitigated, including action plans to reduce risk to an acceptable level.
   - Monitored, including a plan for ongoing reporting until threats are fully resolved.

Additional evidence may include:

- Documentation through reports, emails, or meeting minutes indicating the areas of the business participating. Risk factors such as impact, likelihood, velocity, and other aspects may be included.
- Highly correlated or interdependent risk factors analyzed to determine the cumulative impact of multiple risk exposures.
- The risk assessment includes the evaluation of the layers of critical asset protection and resources to prevent a single point of failure.
- The risk assessment is updated by incorporating lessons learned from actual crises, disruptions, and the results of tests and scenarios.

- The organization prioritizes the areas that pose the highest risk based on the potential impact and likelihood from its business impact analysis.

B. The organization has assigned and periodically reviews accountability and responsibility to an individual or team to monitor and report on resilience risks. The individual or team comprises qualified individuals with experience in managing resilience, ideally within the organization's industry (such as health care, financial services, or public sector). The individual or team participates in periodic training to stay aware of emerging trends in resilience risk.

C. The organization has established a process to monitor organizational resilience risks (emerging or previously identified) and quickly escalate those that reach a level considered unacceptable as defined by the organization's established risk management guidelines and risk tolerance, or by applicable legal and regulatory requirements. Impacts on organizational resilience risk, including from financial and nonfinancial measures, are considered. Examples of financial measures include revenue, expenses, profitability, cash flow, debt, stock price, and overall value. Examples of nonfinancial measures include brand reputation, customer satisfaction, environmental implications, and personnel turnover. The process includes:

- Initial identification of risk and timely escalation.
- Analysis to evaluate the risk and how it could prevent the achievement of organizational objectives.
- Proposed and agreed upon risk mitigation action plans, including how to reduce risk to an acceptable level in a timely manner. Action plans are based on the overall enterprise risk management strategy. The proposal should include necessary risk mitigation resources, such as financial, personnel hours, and additional technology and software needed to increase capabilities.
- Ongoing risk monitoring and reporting on key risk indicators until threats are fully resolved.

D. The organization has implemented a process to respond to and recover from crises, disruptions, emergencies, or other incidents. The process is fully tested periodically, such as quarterly or annually, and may include more frequent partial testing, such as monthly. Critical services may require more frequent testing. The incident response and recovery process may include:

- Detection – continuous monitoring for cyber events. This may include the use of an intrusion detection system, threat intelligence, or security information and event management (SIEM). The SIEM may use artificial intelligence to strengthen the process. In the event of natural disasters or facility failures, the organization has established a communication network (such as alert protocols or notifications) for timely awareness and information sharing. For all events, the organization has defined a process to notify applicable emergency responders and legal authorities. Events should be prioritized based on criticality.
- Response and Containment – the incident response approach includes scenario analyses and periodic stress testing against a range of disruptive events. For

example, to prevent further damage during cyber events, the organization has implemented a process to isolate compromised assets, such as re-routing network traffic or limiting user access during an event. For physical events, the organization has implemented a process to physically isolate disruptive events to limit the impact, including relocating employees to an alternate location.

- Recovery – for cyber- or IT-related events, the organization has established procedures to prioritize recovery of critical assets that are needed to resume operations (such as restoring data from backups or bringing servers back online). Other non-IT resources that are required to resume operations should also be prioritized for recovery. This may include planning a gradual return for key personnel or core functions.
- Post-incident analysis – the organization analyzes events to determine:
  - Root causes of disruptive events.
  - Effectiveness of actions taken.
  - Improvements required to strengthen resilience processes, such as updating policies, procedures, risks, or strategy, among others.

The response and recovery process testing for rigor and effectiveness, through tabletop exercises, simulations, and drills covering critical services/functions and their dependencies, may be aligned with organizational risk tolerance levels. These events can be from internal or external incidents. Results of these exercises may be reviewed by the board and senior management, with improvement actions tracked and reported periodically. Recommendations should be actionable, with clear ownership and timelines.

Control Process Considerations

To assess how control processes are applied to organizational resilience objectives, internal auditors may review evidence that:

A. A process is in place to identify and assess critical third-party providers (suppliers and vendors) and minimum inventory levels needed to continue vital operations. The assessment may consider third-party resilience and business continuity and include risk ratings for each vendor. In addition to reviewing vendors before entering into a formal agreement, the organization may review vendors periodically to continually evaluate risk ratings. The organization maintains a listing of potential replacement vendors in the event that a vendor relationship ends.

B. Management has performed a data classification exercise, in particular identifying critical data that is required to recover from disruptive events and maintain operations. The organization has implemented effective internal controls to protect critical data, including limiting access to authorized personnel and ensuring that critical data is backed up and recoverable in a timely manner.

C. Management has established critical IT controls and continuous monitoring processes to mitigate information security risks (including cyber-related risks) and ensure sensitive data is protected during disruptive events. Encryption protects sensitive data. Continuous monitoring and real-time threat intelligence provide management with

alerts, and issues are resolved in a timely manner. Widely adopted control frameworks from organizations such as NIST, COSO, ISO, and others may be used.

D. The organization has inventoried critical IT assets, including hardware, software, and services required to support operations during crises, disruptions, and emergencies. IT assets that are more difficult to acquire quickly are identified as high priority.

E. A business continuity plan and a disaster recovery plan are established, and identify personnel for recovery teams, which are based on business impact analysis. The plans are tested periodically, such as quarterly or annually, through tabletop exercises or stress testing, where disruptions simulate real emergencies and include testing of communication protocols with both internal and external stakeholders. The results of testing, including improvement opportunities, are reported to the board and senior management.

F. A process is established to modify the working environment during disruptive events. Modifications may include using alternative workplace locations, such as working from home or setting up a temporary office in a timely and efficient manner. The organization may use hybrid or remote working options to replace on-site work. Other aspects may include protocols for the timely and efficient mobilization and reallocation of resources, including IT and human resources.

G. A process is in place to continuously monitor and report emerging threats and vulnerabilities related to organizational resilience and to identify, prioritize, and implement opportunities to improve organizational resilience operations. Monitoring activities may include key risk indicators (KRIs), risk dashboards, and risk horizon-scanning exercises. The organization may provide updates to all employees on emerging threats to raise awareness, including mitigation measures or controls. All whistleblower activity is logged, analyzed, resolved in a timely manner, and communicated to senior management. Ongoing monitoring may be necessary to resolve issues, which will require additional reporting.

H. A process is in place to educate and train personnel on organizational resilience policies and procedures to follow when crises, disruptions, and emergencies occur. The process includes training exercises that simulate disruptive scenarios. Training is conducted periodically, such as quarterly or annually. Critical services may need to be tested more frequently.

I. A process is in place to ensure the necessary operational, human, technological, and financial resources are budgeted and available during crises, disruptions, and emergencies. Management periodically, such as quarterly or annually, reviews resources to ensure they are adequate based on perceived risk levels and communicates needs to the board. Critical services may need to be tested more frequently. The analysis includes assessing liquidity, insurance coverage, and contingency funding arrangements. Financial resource requirements are planned based on factors such as the organization's size, complexity, industry, and risk profile. The process may include preapproval of funding.

J. A process is in place for reviewing crises, disruptions, and emergencies after they occur and analyzing post-incident reviews through a lessons-learned process. The reviews

should be documented in formal reporting, and the lessons learned should be integrated into future resilience planning.

Appendix A. Application Scenarios

The following scenarios describe when the Organizational Resilience Topical Requirement would be applicable. In addition, The IIA's "Topical Requirements Application Guidance" provides practical advice on navigating mandatory requirements, addressing limitations, and identifying critical risk thresholds.

Scenario 1: Organizational resilience is identified for an internal audit engagement included in the internal audit plan.

When the internal audit function completes its risk-based planning process and includes one or more engagements on organizational resilience in its internal audit plan, the Topical Requirement must be applied when conducting such engagements. Conformance may be achieved by including the requirements across one or more engagements in the internal audit plan.

Organizational resilience is a broad topic, and not every requirement in the Topical Requirement may apply in every engagement. When internal auditors apply professional judgment and determine that one or more requirements of the Organizational Resilience Topical Requirement are not applicable and therefore should be excluded from an engagement, internal auditors must document and retain the rationale for excluding those requirements. For example, the rationale for excluding some requirements could be that the internal audit function performs various organizational resilience engagements on a rotational basis or has determined that the risk's significance in the engagement is low.

Scenario 2: Organizational resilience risks are identified during an audit engagement that is not focused on organizational resilience.

Internal auditors may identify resilience risks while assessing a process not directly related to resilience. For example, internal auditors may be assessing the human resource processes (such as hiring and retaining personnel) in an engagement not focused on organizational resilience and do not identify resilience risks as within the scope when planning the engagement. However, after performing the initial walkthrough, internal auditors determine that these risks are in scope; for example, they identify succession-planning risks related to how the organization retains personnel (Standard 13.2 Engagement Risk Assessment).

Once relevant risks have been identified, internal auditors must review the Organizational Resilience Topical Requirement and determine which requirements are applicable. In this example, they might only focus on requirement E in Governance and exclude the other risk management and control requirements. They must document in the engagement workpapers the rationale for excluding the other requirements of the Organizational Resilience Topical Requirement and retain the documentation.

Scenario 3: An organizational resilience engagement that was not originally included in the internal audit plan is requested.

Stakeholders such as the board, management, or a regulator may ask internal auditors to perform resilience assessments outside the original audit plan. For example, when organizations are the target of a cyberattack, the board may request an internal audit engagement to assess resilience controls to evaluate how well the organization is prepared to recover from a cyberattack. The Topical Requirement is applicable, the requirements must be assessed, and any exclusions documented (Standard 9.4 Internal Audit Plan).

Appendix B. Example Audit Engagements Based on Application Scenarios

Scenario 1: The topic is an engagement in the internal audit plan.

Public Sector Entity Responsible for a Central Wholesale Market

During its annual risk-based planning process, the internal audit function identifies continuity of essential market operations as a high-risk area due to exposure to logistical disruptions, public health events, and critical infrastructure dependencies. Based on this assessment, internal auditors determine that the Organizational Resilience Topical Requirement is applicable to the planned engagement.

To assess governance, internal auditors review board minutes, strategic plans, and budget documentation to determine whether resilience-related objectives are formally established and overseen. They evaluate whether management provides periodic reporting to the governing body on critical vulnerabilities such as transportation dependencies, infrastructure constraints, and health-related risks. Where no single resilience strategy document exists, internal auditors assess whether resilience elements are consistently embedded across operational and strategic documentation.

From a risk management perspective, internal auditors examine the organization's risk register and interview operational management to confirm whether risks that may affect continuity of supply are identified, assessed, and assigned to accountable owners. They test whether escalation mechanisms were activated during prior events, such as temporary closures or access restrictions, and determine whether response actions were aligned with defined risk tolerance parameters.

Control procedures include reviewing operational continuity arrangements, inspecting evidence of periodic testing exercises, and examining documentation of coordination with public authorities during disruptive events. Internal auditors also review post-incident reports to determine whether lessons learned were incorporated into updated processes. Where certain requirements of the Topical Requirement are not applicable due to legislative or structural constraints, internal auditors document the rationale for exclusion in accordance with the Standards.

Scenario 2: The topic is identified while performing an engagement.

Globally Distributed Professional Services Firm

During an engagement focused on governance and enterprise risk management, internal auditors identify vulnerabilities related to decentralized decision-making, reliance on key local leadership,

and regulatory exposure across jurisdictions. Based on these observations, internal auditors determine that certain elements of the Organizational Resilience Topical Requirement apply to the engagement.

To assess governance, internal auditors review global policies, board reporting materials, and crisis management protocols to determine whether the organization has defined how operations will be sustained during regulatory changes, significant turnover of critical personnel, or reputational events in one jurisdiction that may have a broader impact. They evaluate whether the governing body receives consolidated reporting on critical risks across jurisdictions and whether accountability for resilience oversight is clearly defined.

From a risk management perspective, internal auditors examine the enterprise risk framework to confirm whether risks related to key-person dependency, cross-border regulatory compliance, and reputational exposure are mapped to the firm's strategic objectives. They perform sample testing of selected incidents to determine whether local events were escalated appropriately to global leadership and whether response decisions were made within defined authority levels.

Control-related procedures include reviewing business continuity arrangements across jurisdictions, examining whether critical roles are adequately covered and whether backup personnel or properly structured succession processes are in place to address contingencies, and assessing the adequacy of technology infrastructure supporting coordinated remote operations. Internal auditors also review documentation of post-event analyses to confirm that corrective actions were implemented. Where only certain requirements of the Topical Requirement are applicable, internal auditors document the basis for inclusion or exclusion.

Scenario 3: The topic is the subject of a requested engagement.

Entity Responsible for Critical National Infrastructure

A destructive hurricane in a neighboring jurisdiction prompts a board member to ask the internal audit function to add an organizational resilience engagement to its audit plan to confirm the entity's exposure to operational interruptions, reliance on specialized contractors, regulatory obligations, and severe environmental events. In this case, the Organizational Resilience Topical Requirement is applied comprehensively.

To assess governance, internal auditors review the board-approved strategic plan and related documentation to confirm that continuity of critical services is formally incorporated into long-term planning. They examine board reporting to determine whether key indicators related to operational availability, maintenance of critical assets, and financial contingency planning, including insurance coverage and reserve allocations, are periodically reviewed.

From a risk management perspective, internal auditors evaluate how risks associated with infrastructure disruption, contractor concentration, regulatory compliance, and environmental exposure are identified, assessed, and monitored within the enterprise risk management framework. They review whether accountability for monitoring these risks is clearly defined and whether escalation protocols were followed during prior service interruptions, including coordination with regulators and emergency authorities.

Control testing includes verifying the existence of business continuity and disaster recovery plans and their periodic testing, reviewing inventories of critical assets, examining contractual

arrangements with alternative providers, and assessing post-incident analysis documentation to determine whether corrective actions were tracked and implemented. Where certain requirements are not applicable due to regulatory provisions, internal auditors document the justification in accordance with the Standards.

Appendix C. Mapping to Frameworks

The organization may have its own organizational efforts, using frameworks such as those from ISO. Internal auditors may have already developed audit programs and testing procedures based on these frameworks. Internal auditors should reconcile their intended organizational resilience control testing to the Topical Requirement to ensure adequate coverage (Standard 13.4 Evaluation Criteria). The chart below maps the Organizational Resilience Topical Requirement to the ISO 22336 Framework. Additional framework references are listed in Appendix E.

Governance Requirements	ISO 22336 Framework
A. A formal organizational strategy that addresses resilience is established by management, overseen by the board, and includes the operational, technological, and financial elements required to manage change and continue operations. The resilience objectives align with the organization's overall approach to risk management.	4.1; 6.1; 6.2; 7.1; 8.4; 8.5; 9.1; 9.5
B. Updates on the achievement of resilience objectives are periodically communicated to the board for review. This ensures resilience is embedded into strategic oversight, long-term planning processes, succession planning, and the organization's culture, including in the resource and budgetary considerations required to support critical business activities.	6.4; 8.6; 10.2
C. Policies and procedures for critical operational, technological, and financial processes are established and periodically reviewed, tested, and updated as needed to strengthen the control environment.	4.2; 6.3; 8.3; 8.4; 9.4
D. An incident command structure is established and used to oversee and support organizational resilience objectives. It includes decision-making hierarchies, communication and escalation protocols, and leadership and operational roles and responsibilities.	5.4
E. A process is established to periodically validate the competencies required for resilience success and reassess the competencies of the individuals filling critical roles in resilience processes.	9.6
F. A process is established to ensure all relevant internal and external stakeholders are identified, prioritized, and engaged in setting up information and reporting structures for the achievement of organizational resilience objectives. Stakeholders may include senior management, operations, risk management, IT, supply chain/procurement, facilities, human resources, finance, legal, assurance providers (including internal audit), compliance, public relations, critical vendors, customers, regulators, and others.	9.2; 9.5

Risk Management Requirements	ISO 22336 Framework
A. Risks related to organizational resilience are periodically identified, assessed, and managed across the organization. Resilience risks are mapped to the organization's strategic objectives. The resilience risk management process includes evaluating key processes.	4.4; 5; 7.3; 7.4; 7.5, 7.6, 9.2, 9.3
B. Accountability and responsibility for organizational resilience risk management are clearly defined. A designated individual or team is assigned to regularly monitor and report on the management of organizational resilience risks, including the resources necessary for risk mitigation and the identification of emerging threats to organizational resilience.	4.3; 8.2; 9.6
C. A process is established to monitor organizational resilience risk (emerging or previously identified) levels and quickly escalate those that reach a level considered unacceptable as defined by the organization's established risk management guidelines and risk tolerance or applicable legal and regulatory requirements. The impacts of organizational resilience risk are considered.	7.2; 7.6; 10.1
D. Management has implemented and periodically tests a process to respond to and recover from occurrences of crises, disruptions, and emergencies. The incident response and recovery process includes detection, prioritization, containment, recovery, and post-incident analysis. The incident response approach includes scenario analyses and periodic stress testing against a range of plausible disruptive events.	7.2; 7.6; 7.8

Control Process Requirements	ISO 22336 Framework
A. The process is in place to identify critical third-party providers (suppliers and vendors) and determine the minimum inventory levels required to sustain essential operations. The process also involves keeping an up-to-date list of alternative suppliers.	7.7
B. Data critical for operations is identified and classified. Data classification includes identifying where the data resides, who requires access to it, how it is accessed, and whether it is backed up and recoverable during an emergency.	6.1
C. Critical IT controls and continuous monitoring are established to mitigate information security risks (including cyber-related risks) and ensure sensitive data is protected during crises, disruptions, and emergencies. The controls and continuous monitoring include real-time threat intelligence and restricting access to authorized users only.	7.5
D. Critical IT assets are inventoried. Assets include the hardware, software, and services required to support operations during crises, disruptions, and emergencies.	9.2
E. Business continuity and disaster recovery plans are established and include defined roles for assigned personnel and recovery teams. The plans are tested periodically (for example, a "tabletop exercise"), and the results of testing, including improvement opportunities, are reported to the board and senior management.	8.6; 9.6; 10.3

F.	A process is established to modify the working environment during crises, disruptions, and emergencies.	9.3
G.	A process is established to continuously monitor and report emerging threats and vulnerabilities that could affect organizational resilience. The process is used to identify, prioritize, and implement opportunities to improve organizational resilience operations, including systems for whistleblowing or gathering risk intelligence.	7.6
H.	A process is established to educate and train personnel regarding organizational resilience, ensuring they are aware of the policies and procedures to follow and actions to take when crises, disruptions, and emergencies occur. The process includes training exercises in which disruptive scenarios are simulated.	10.2; 10.3
I.	A process is established to ensure the necessary operational, human, technological, and financial resources are budgeted and available during crises, disruptions, and emergencies. Financial resources necessary to support organizational resilience are periodically analyzed and communicated to the board.	6.4; 7.6; 9.6
J.	A process is established for reviewing crises, disruptions, and emergencies after they occur and analyzing post-incident reviews through a lessons-learned process, including integrating the lessons into future organizational resilience planning.	10.2, 10.3

Appendix D. Optional Documentation Tool

Internal auditors are expected to exercise professional judgment in determining the applicability of the requirements based on the risk assessment and appropriately document the exclusions of certain requirements. The Topical Requirement can be documented in the internal audit plan or in the engagement workpapers based on the auditor's professional judgment. One or more internal audit engagements may cover the requirements. In addition, not all requirements may be applicable. This printable form provides one option for documenting conformance with the Organizational Resilience Topical Requirement, but its use is not mandatory.

Organizational Resilience – Governance

Requirement	Executed Coverage or Rationale for Exclusion	Documentation Reference
A. A formal organizational strategy that addresses resilience is established by management, overseen by the board, and includes the operational, technological, and financial elements required to manage change and continue operations. The resilience objectives align with the organization's overall approach to risk management.		
B. Updates on the achievement of the resilience objectives are periodically communicated to the board for review. This ensures resilience is embedded into strategic oversight, long-term planning processes, succession planning, and the organization's culture, including in the resource and budgetary considerations required to support critical business activities.		
C. Policies and procedures for critical operational, technological, and financial processes are established and periodically reviewed, tested, and updated as needed to strengthen the control environment.		
D. An incident command structure is established and used to oversee and support organizational resilience objectives. It includes decision-making hierarchies, communication and		

	escalation protocols, and leadership and operational roles and responsibilities.		
E.	A process is established to periodically validate the competencies required for resilience success and reassess the competencies of the individuals filling critical roles in resilience processes.		
F.	A process is established to ensure all relevant internal and external stakeholders are identified, prioritized, and engaged in setting up information and reporting structures for the achievement of organizational resilience objectives. Stakeholders may include senior management, operations, risk management, IT, supply chain/procurement, facilities, human resources, finance, legal, assurance providers (including internal audit), compliance, public relations, critical vendors, customers, regulators, and others.		

Organizational Resilience – Risk Management

	Requirement	Executed Coverage or Rationale for Exclusion	Documentation Reference
A.	Risks related to organizational resilience are periodically identified, assessed, and managed across the organization. Resilience risks are mapped to the organization's strategic objectives. The resilience risk management process includes evaluating key processes		
B.	Accountability and responsibility for organizational resilience risk management are clearly defined. A designated individual or team is assigned to regularly monitor and report on the management of organizational resilience risks, including the resources necessary for risk mitigation and the identification of emerging threats to organizational resilience.		
C.	A process is established to monitor organizational resilience risk (emerging or previously identified) levels and quickly escalate those that reach a level considered unacceptable as defined by the organization's established risk management		

	guidelines and risk tolerance or applicable legal and regulatory requirements. The impacts of organizational resilience risk are considered.		
D.	Management has implemented and periodically tests a process to respond to and recover from occurrences of crises, disruptions, and emergencies. The incident response and recovery process includes detection, prioritization, containment, recovery, and post-incident analysis. The incident response approach includes scenario analyses and periodic stress testing against a range of disruptive events.		

Organizational Resilience – Controls

Requirement		Executed Coverage or Rationale for Exclusion	Documentation Reference
A.	A process is in place to identify critical third-party providers (suppliers and vendors) and determine the minimum inventory levels required to sustain essential operations. The process also involves keeping an up-to-date list of alternative suppliers.		
B.	Data critical for operations is identified and classified. Data classification includes identifying where the data resides, who requires access to it, how it is accessed, and whether it is backed up and recoverable during an emergency.		
C.	Critical IT controls and continuous monitoring are established to mitigate information security risks (including cyber-related risks) and ensure sensitive data is protected during crises, disruptions, and emergencies. The controls and continuous monitoring include real-time threat intelligence and restricting access to authorized users only.		
D.	Critical IT assets are inventoried. Assets include the hardware, software, and services required to support operations during crises, disruptions, and emergencies		

E.	Business continuity and disaster recovery plans are established and include defined roles for assigned personnel and recovery teams. The plans are tested periodically (for example, a “tabletop exercise”), and the results of testing, including improvement opportunities, are reported to the board and senior management.		
F.	A process is established to modify the working environment during crises, disruptions, and emergencies.		
G.	A process is established to continuously monitor and report emerging threats and vulnerabilities that could affect organizational resilience. The process is used to identify, prioritize, and implement opportunities to improve organizational resilience operations, including systems for whistleblowing or gathering risk intelligence.		
H.	A process is established to educate and train personnel regarding organizational resilience, ensuring they are aware of the policies and procedures to follow and actions to take when crises, disruptions, and emergencies occur. The process includes training exercises in which disruptive scenarios are simulated.		
I.	A process is established to ensure the necessary operational, human, technological, and financial resources are budgeted and available during crises, disruptions, and emergencies. Financial resources necessary to support organizational resilience are periodically analyzed and communicated to the board.		
J.	A process is established for reviewing crises, disruptions, and emergencies after they occur and analyzing post-incident reviews through a lessons-learned process, including integrating the lessons into future organizational resilience planning.		

Appendix E. Additional Framework References

Area	ISO Reference	Scope/Clause headings
Governance	ISO 22316:2017	Policy and strategy; leadership commitment; shared vision; culture; communication; continual improvement.
Risk management	ISO 31000:2018	Scope/context/criteria; risk assessment; treatment; monitoring; communication.
Business continuity/disaster recovery foundations	ISO 22301: 2019; ISO/TS 22317:2021	BCMS context, leadership, planning, operation; BIA activities and outputs.
Supply chain resilience	ISO/TS 22318:2021	Supplier dependency analysis; continuity strategies; alternates; assurance requirements.
Information and communication technology readiness	ISO/IEC 27031	ICT continuity; recovery objectives; testing and improvement; BCMS alignment.

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