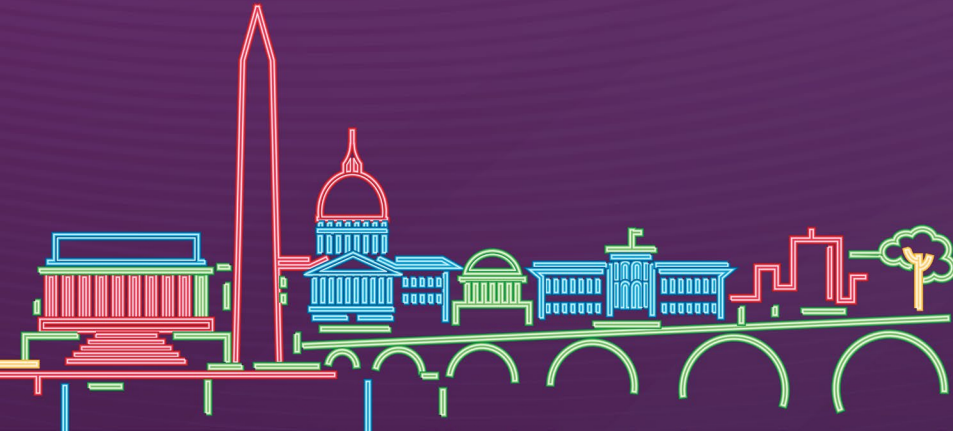


Office of the Comptroller of the Currency

Asset Management Policy Update

Chizoba Egbuonu, Director for Asset Management



BISA 2025 Regulatory &
Compliance Summit

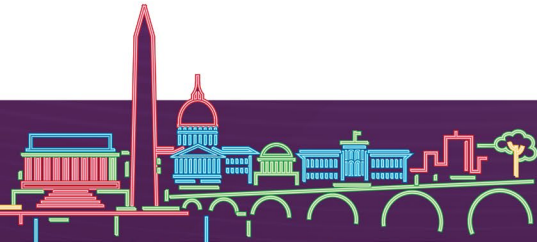
Disclaimer

The views and opinions expressed in this presentation are my own, and do not necessarily represent those of the Office of the Comptroller of the Currency or Chief National Bank Examiner.

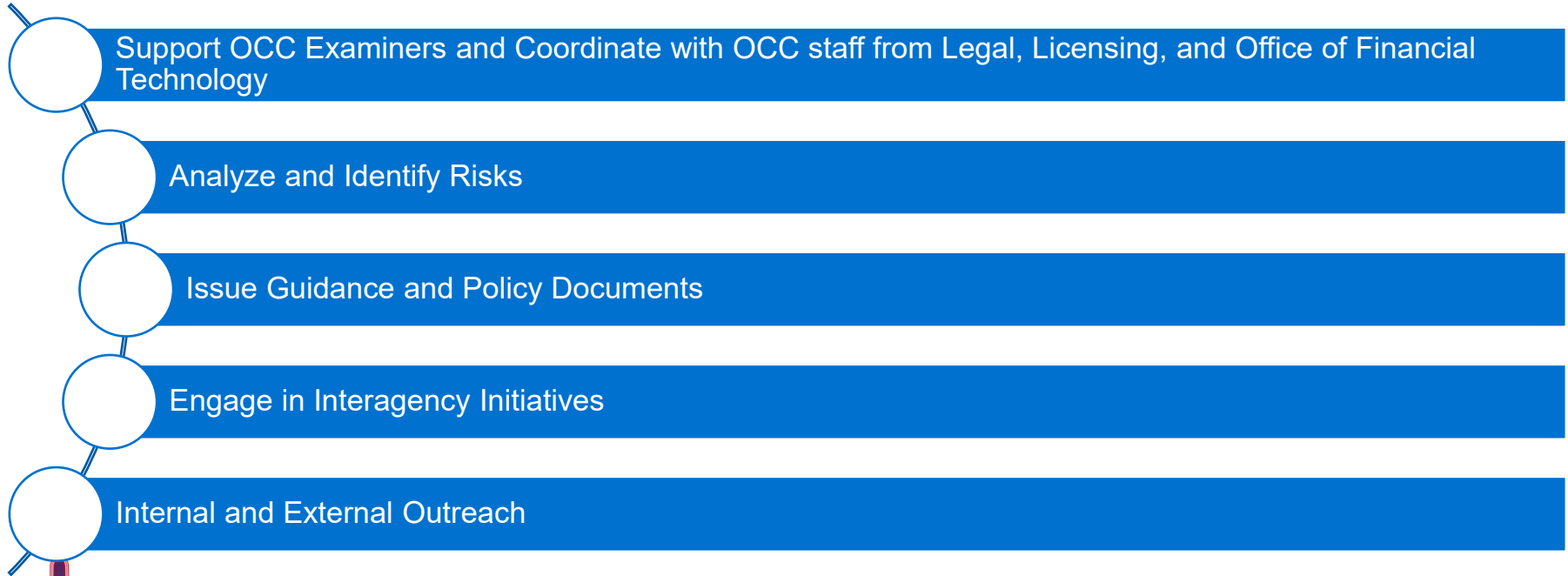


OCC Asset Management Supervision

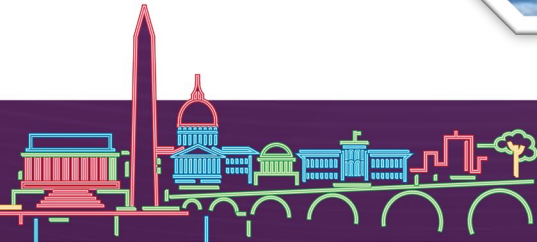
- As of 6/30/25, OCC supervises 748 national banks, 234 federal savings associations (FSAs), and 49 federal branches and agencies.
 - \$16.7 trillion in assets – 67% of U.S. commercial bank total.
 - 56 NBs and FSAs with >\$10 billion in assets; 207 with \$1 - \$10 billion in assets; and 706 with <\$1 billion in assets.
- As of 6/30/25, OCC supervises \$14.1 trillion in fiduciary assets and \$71.4 trillion in custody assets (44.5 percent of all fiduciary and custody assets are in insured national banks and federal savings associations, and uninsured national trust banks).



Role of OCC Asset Management Policy



Regulatory Developments



Regulatory Developments- OCC



OCC 2025-30

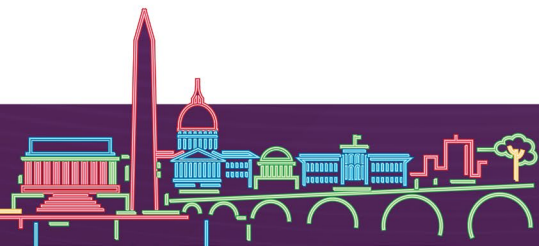
- Prohibition on Use of Reputation Risk by Regulators

OCC 2025-25

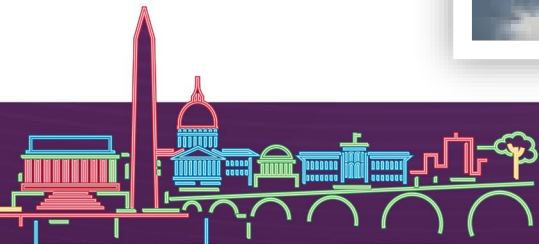
- Exam Procedures for Community Banks

OCC 2025-17

- Crypto-Asset Safekeeping Services

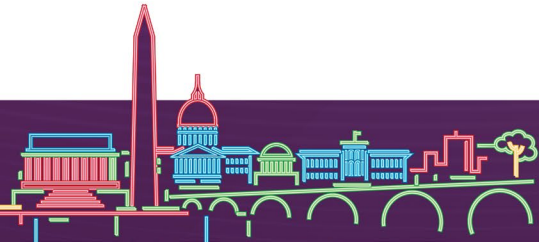


RNDIP: Risk Management



Program Management

- Tailor to address risks associated with the sales program
- Include a summary of the policies and procedures outlining the features of the program
- Address the scope of activities of any third parties involved and monitoring of such third parties



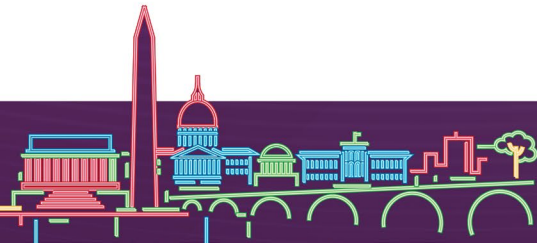
Policies and Procedures

- Tailored to the risks and complexities of the bank's program
- Address compliance with applicable laws and regulations
- Outline the types of products that are sold
- Describe the employees who will sell investment products
- Designate the supervision of personnel involved in sales
- Procedures for the use of customer information



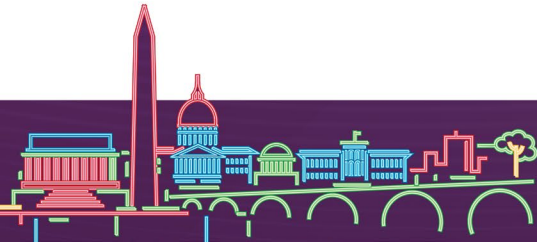
Third Party Risk Management

- Utilize a due diligence process for selecting and monitoring the third party
- Obtain periodic reports from the third party



Product Selection

- Perform adequate due diligence when selecting RNDIP Products
- Engage in appropriate monitoring of the selected products
- Review broker-dealer's approved RNDIPs is relying on the broker-dealer's product selection and monitoring process

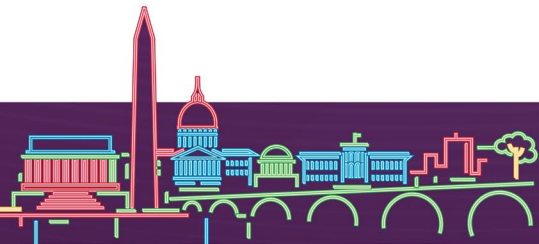


Compensation and Incentive Program

- Assess the structure of the RNDIP provider's compensation program
- Monitor compensation paid to dual employees
- Understand GLBA's restrictions on Incentive compensation and Referral Fees to Bank Employees



Questions?



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