

WHITEPAPER

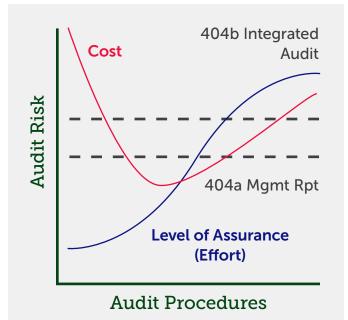
Prepare for Your 404b SOX Transition





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Theoretically, there is no substantive difference between SOX 404a and SOX 404b's execution of internal controls over financial reporting. Your organization shouldn't need to do new risk assessments. It shouldn't need to create more controls. The only real difference between 404a and 404b is the requirement to have your auditors attest to the effectiveness of your control framework regarding financial reporting. However, this simple change creates significant risk for the auditor. Risk is a cost lever. Conceptually, related cost and assurance to a graph based on audit risk and attestation performed, you'd have a level of assurance (effort) going from low to high in a fairly linear fashion intersecting a u-shaped cost line correlated to risk going high-lower-high. Unlike classical economic graphs, the intersection isn't the decision point or threshold point. Auditors have professional standards to maintain based on the type of report. Therefore, you would have a baseline for 404a that intersects cost and level of assurance as your threshold point and again for 404b. The critical difference is the baseline of work performed, and risk is higher for a 404b integrated audit versus a 404a opinion and audit.



Knowing this helps you understand how to manage risk internally and helps you understand the difficult position it puts your auditor in to strike a balance between risk and cost.

Additionally, auditors are inherently risk-averse as an erroneous assurance is often more costly to their organization in fines and negative brand recognition than it is to your organization. This is most people's root cause of 'the SOX 404b headache.' The difference in risk tolerance means much higher scrutiny of your internal controls over financial reporting than your team has likely had to deal with previously. There are no more "free passes" from your auditor as risk of loss is shared. Many come out of this transition with higher audit fees due to out-of-scope work to find compensating controls and deficiency documentation by the auditor. In subsequent periods, this will drive additional costs from needed additional controls to buttress weaker controls, auditable documentation that can be reviewed independently, and management oversight to appease the auditor.

The auditor's risk of loss has increased in recent years with **PCOAB fines on audit firms** doubling what they were just a few years ago. As many as **33% of these failures** were Part 1.A driven by a lack of sufficient audit evidence. **2022 PCOAB staff observations** noted "deficiencies in controls testing remain a common occurrence," with issues around level of precision, completeness and accuracy of IPE, and insufficient controls over relevant risks and assertions. This has led to an even higher audit scrutiny, especially around internal controls over financial reporting.

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Executives often come out of this experience seeing 404b compliance as <u>costly and unnecessarily</u> <u>tedious</u>. However, if companies build the proper compliance foundation for SOX 404b, they can strategically align it to the company mission and drive value within their organization. By creating this practical and more agile program, you will be ahead of the pack and ready for your 404b transition.

An aligned compliance program has elements including embedded compliance, risk management, and controls native to business processes, and the fabric of a company often impacts business performance in several ways.

For instance:



Companies that natively embed their 404b controls into their business processes know their risk at all times. This can help minimize lost time and productivity, safeguard earnings, and protect the company's brand image.



Compliance programs can also ensure continuous audit readiness. By transforming into an "always-live" compliance environment, discovery and updating steps happen immediately instead of requiring tedious, inefficient work, making continuous audit readiness play a role in improving operational efficiency.



Also, with a transformed compliance program, companies can reduce staffing pressures to manage risk. This is crucial because, as a **Deloitte report** once showed, many companies need to pay more attention to their human resource requirements and the scope of the documentation, evaluation, and testing efforts.



Lastly, the right foundational compliance programs will ensure agility to burgeoning regulatory compliance. This is a challenging feat, considering the constant changes and the increasing complexity that stem from the ever-evolving regulatory mandates and scope,



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In March 2023, **FloQast surveyed** 370 full-time employees with some responsibility for financial compliance and control in their organization. Those surveyed included 213 professionals from the United States and 157 from the United Kingdom. The following interesting observations emerged.

1 Compliance and control professionals believe the benefits of control programs can outweigh their associated burdens by far.

When compliance and control professionals rated their current compliance efforts on a 100-point scale, with 0 representing all burden/ no benefit and 100 representing all benefit/ no burden, the average professional rated their current compliance and financial control function at about 70% benefit and 30% burden.



2 Regrettably, compliance programs emphasize execution and tactics more than strategic management, leaving blind spots to adverse outcomes.

Nearly 75% of the participants reported their organization had financial transaction controls. However, only about 50% reported the presence of process narratives, and 60% had flowcharts. Process narratives and flowcharts link strategic aim with the execution of the process, and this finding implies that organizations do a lot of things without a clear blueprint and a focus on the intended objective.

Source: Compliance and Controls, The State of the Industry Survey, FloQast, May 2023

Formation and management of the compliance and control function is more hasty than intentional.

Survey findings reveal that organizations staff their control teams with an understanding of the actual staffing requirements and compliance, and employees need more technical appreciation of their roles.

This third observation is lent credit because 65% of survey respondents need help understanding the larger purpose of their work, while the average compliance literacy score was only 10.11 out of 25 points.

10.11 Total possible score: 25

Organizations need to leverage technology to support their compliance and control functions.

Survey findings reveal that only 30% of the participants had automated compliance and control processes. Plus, just one-third of participants say their technology works in ways that make intuitive sense.

FloQast has transformed the way we've been able to see our SOX and controls environment in a clearer fashion, it's a totally improved program. We have fewer meetings, less back and forth, and I can report up to our CFO or CAO in a more thorough and meaningful way."

Christina Kang

Senior Director Technical Accounting and SEC Reporting, Veracyte



These findings point to the untapped potential of compliance programs and show that companies need a more robust and effective program. Such a program should help an organization meet its compliance and control objectives and gain strategic value.

In addition, companies should note three crucial points of focus when transitioning their compliance program to one that can stand up to 404b attestation requirements.

Companies Should See the Value in Having an Agile, Efficient SOX Program

When companies appreciate the significance of having an efficient SOX program, there's a likelihood that such a program will lead to delivering on corporate strategy and providing better controls. Implementing SOX programs for regulation's sake should be avoided.

A Good SOX Program is an Audit Partner

A robust and efficient SOX program is an auditor's best ally because SOX programs are intentionally designed to be auditable.

Robust and efficient SOX programs will reduce substantive testing by allowing them to do control testing. Though this has been a failed promise on many audit engagements, that is driven by poor control environments that either prevent auditors from relying significantly on them or require extra work that diminishes benefit. Contrary, an aligned compliance program that has elements including embedded compliance, risk management, and controls native into business processes for at the source capture, allow external auditors to fully achieve the benefits of control testing with minimal effort. Ultimately, this allows external auditors to achieve their objectives with reduced risk and fees. Remember, the auditor's strategy is often influenced by both the magnitude and nature of control deficiencies.

Plus, robust SOX compliance programs promote coordination with the audit teams, particularly in the areas of reliance. When the time for the annual audit arrives, the auditors already know the effectiveness of the SOX program, including whether they can rely on it.

Companies Should Use SOX Compliance Programs Strategically

Companies should not view SOX compliance programs simply as regulatory required operational procedures. SOX compliance programs are more effective when integrated into a company's long-term strategy.

An example would be an organization looking to execute growth through a series of acquisitions. Acquisitions often rely on synergy goals between operations of the companies to drive target value. This is usually a combination of streamlining processes, teams, and systems. Consequently, this often fails to drive targeted value due to poor execution from lack of visibility, understanding, and process adherence. If you strategically link your compliance to your M&A initiative, you will have an operational foundation that has visibility, understanding, and process adherence through compliance to drive targeted value instead.

Characteristics of a strategic SOX compliance program would be controls and processes (including workflows) that are carefully designed and elaborately documented, along with documentation that states the purpose and objectives of each control process.

Such an approach can help employees and control owners understand SOX programs in a more holistic and wholesome manner so that they will not perceive them as unnecessary burdens. Employees will see the risks that each control process prevents in such a way that they will assess the effectiveness of the controls. In addition, visibility into the "why" allows control owners to assess the necessity of the control within the large environment as the business develops.

Having well-documented evidence allows an auditor to readily assess the controls and control environment and not have to spend additional time and resources to build that understanding. This will prevent external auditors from pushing excessive control work to offset misunderstood risk.



Step 1: Promote a Strong Tone at the Top

A company's senior leadership, starting from the audit committee and the board of directors, to the chief executive, and other C-suite members set the stage for how a program is perceived by the rest of the organization.

Without management buy-in, even the best SOX compliance program cannot be successful, no matter how fervently it is championed by the finance department. No amount of tools, templates, software, infrastructure, etc. can succeed without management buy-in.

On a more practical note, top management should:



Identify strategic SOX compliance goals and evaluate the realization of the stated goals annually.



Allocate resources, including time and money, to the attainment of a robust SOX compliance function. The audit committee should discuss the SOX compliance program, monitor its implementation, and objectively evaluate any feedback.

Form an advisory task force of relevant department heads from across the company to facilitate the exchange of SOX information, monitor progress, and provide feedback. Advisory task force members can include CFO, Controller, IS/IT, operation heads, sales and marketing, HR, and the company's legal advisor.



Promote a culture of openness where SOX concerns can be discussed without fear of victimization or backlash.



Step 2: Select the Right Person to Oversee the SOX Compliance Program

Another way to improve a SOX compliance program is selecting the right person or entity to review the program.

Management should appoint a SOX compliance champion from within the organization to serve as the main SOX point person. This is separate from internal audit. While they should be testing and advising, the execution needs to be outside of internal audit for their work to be fair and free of compromise.

Ideally, a SOX compliance champion should have a deep understanding of the organization, rich knowledge of SOX compliance, excellent project management and communication skills, and have sufficient time to carry out this crucial responsibility.

On a more practical note, management should:

- Appoint a SOX compliance officer by considering his or her requisite skills such as communication and leadership skills, understanding of the business, and ability to create and foster intra-company relationships.

Reallocate or postpone tasks for less critical projects on the plate of a SOX compliance champion, as necessary, and provide proper authority to enact change.



Include the training and development costs of a SOX compliance officer in the company's annual budget.

With the accounting staffing issues facing accounting today, it may be difficult to find this individual internally or externally. In fact, many companies have had <u>material weaknesses due to accounting</u> <u>shortages</u>. However, the COSO framework, specifically COSO 4, requires the control environment to have a competent workforce in order to properly function. Leaders should then look to develop that individual internally and upskill them as necessary. Refer to our compliance journey page and FloQademy site for more resources to help develop your team. We are here to help. During this process it is important to use a consulting partner you can trust to keep your transition on-time. Better yet, find a partner that can act as a mentor to your internal champion to bring them up to speed quicker. CFGI believes long-term success goes beyond implementation into education.



Step 3: Align all Stakeholders

Proper SOX compliance extends beyond the Office of the CFO. It extends beyond internal audit. Truly, it extends beyond sales, operations, and marketing and into external parties as well. While SOX doesn't inherently cover all business cycles such as procureto-pay, order-to-cash, or payroll, it does cover financial reporting risks, controls, and processes which exist in almost every business cycle. It's regrettable that in most companies, key stakeholders and operational heads across the company know nothing about the SOX program. Most will know even less about internal or external auditor's schedule or work plan. This produces miscommunication, poor execution, and increased risks which will ultimately result in increased work, increased fees, and a check-the-box mentality.

The COSO framework, the most common framework deployed by public companies for their ICFR, requires companies to establish structures, reporting lines, authorities and responsibilities (Principle 3). In essence, it is mandatory that stakeholders are truly aligned in order for the CEO and CFO to sign-off on their quarterly 302 certification. Yet, many do not see this level of alignment.

To improve and transform an organization's SOX compliance program, align all stakeholders. Ensure your business leaders and control owners have a clear understanding of the structure, reporting lines, authorities and responsibilities. Ensure they are communicating about critical information, have the ability to monitor progress, and a formal way to receive feedback. Do not forget that your external audit partner is a key partner in your SOX compliance, especially your 404b compliance. It is their additional scrutiny that results in a more robust program. Having their insights early in the transition and regularly post transition is critical for an efficient program. Internal and external auditors should communicate with each other throughout the process, especially during the audit planning stages. Same goes for your operational heads. While their assistance during an audit might be lighter, they can often add context to the control risk, and if findings are shared in a timely manner they can implement risk-mitigation that much sooner.

This collaborative approach can enhance audit efficiency, by identifying and eliminating duplicative roles.

Management can do this by:

- Leveraging your SOX compliance task force as it should include many of the key individuals.
- Aligning early and communicate often.
- Ensuring external auditors review and approve the organization's control test plan, especially if external auditors are expected to rely on management's SOX testing.
- Planning for the next annual SOX audits shortly after the 10-K is filed. This gives ample time for necessary planning and preparation.
- Convening regular meetings with all key stakeholders to ensure everyone is consistently aligned with the SOX project plan.



Step 4: Establish Ownership and Accountability

Any SOX compliance program is bound to fail, or achieve little, unless management grants control owners a measure of ownership and accountability. COSO Principle 4 notes that allocating the proper authority to individuals to key stakeholders is critical for compliance, and Principle 5 discusses the importance of holding people accountable for a functioning compliance program. However, it is often easier said than done. Authority and ownership are not as simple as assigning, nor is accountability as simple as reprimanding. They need to be encouraged for people to take an active mindset to it.

Control owners, with clearly written tasks and the ability to provide feedback on the tasks will be more vested in the outcome. Compliance roles and responsibilities that are clearly linked to job function, performance evaluations, and forward career progress lay out a clear reward system.

From a workflow execution lens, business is constantly evolving and the environment is constantly shifting. Timely action and remediation is a critical component in assessing the effectiveness of a compliance program. Your control owners are the first to see these changes and often most adept at solving them. Allowing them quick, easy ability to update and change processes to address new risks is important. However, this needs to be done with visibility for downstream participants such as SOX champion, Controller, internal audit, and external audit. Striking the balance used to be difficult. With recent technology developments teams now have the agility to achieve both outcomes. See our technology discussion in step 9 for more detail.

Management can establish ownership and accountability by:

- Clearly defining duties and expectations through department-specific policies or with a comprehensive SOX compliance manual.
- Implementing SOX compliance performance metrics in performance evaluations.
- Tying rewards and recognition to successful SOX compliance initiatives, highlighting the positive contributions of individuals or teams.
- Implementing technology that integrates controls to process execution and supports it with communication and visibility.

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Step 5: Continuously Educate Control Owners

SOX compliance has evolved over the two decades since the rules were first introduced. There have been significant changes in the documentation requirements.



In addition, technological advancements happen at the speed of light.



New rules continue to be introduced.



New PCAOB audit practice alerts continue to surface.



New and innovative ways of working are developed.

For instance, the PCOAB alerts once pushed for process narratives and then in the mid 2010's pushed for flowcharts. Management review controls have been a hot topic on and off for years. All this is to say the environment of best practices and required work is constantly shifting.

All these factors point to the need for continuous education and training, especially for process owners to know that is "good" vs. "bad" documentation.

To better educate process and control owners, top management should:

- Create a reliable system for reviewing the results of recent PCAOB inspection reports, as well as, publications from other authorities such as the Institute of Internal Auditors.
- Train control owners regularly on internal control best practices particularly using real-world examples.
- Review technology developments in the marketplace from SOX compliance to point solutions.
- Create a strong network within your community to find new ways of working.

Step 6: Reassess Risks

Inherent risk doesn't really change during transition from 404a to 404b. Instead the execution (control and residual) as well as third party risks change. How you address those risks is the difference between 404a and 404b. The additional third party scrutiny on your execution of control and residual risk will require a reassessment of risk under a new lens.

Reassessing your risk is a great way to improve SOX compliance. This is vital because a risk designated as "significant" in one year may be designated as "low" the following year. Periodic reassessment is one of the best ways to deploy continuous improvement. Re-calibration allows for a leaner and more efficient 404b program, reducing costs over time.

On the flip side, new risks will emerge. The organization can only identify these risks by periodically reassessing its risk profile and maintaining proper visibility into its risk environment.

Based on an organization's regular risk reassessment, management can design new controls or recalibrate existing ones to ensure an efficient and effective risk management program. On a more practical note, top management should:

- Tone-at-the-top is critical to the execution and success of your program.
- Set a schedule and method to reassess risk. We recommend this is more than an annual assessment.
- Reassess risk whenever there is a significant change to the business.
- Ensure an ongoing system of assessing, responding to, and monitoring risks.
- Create a technology foundation that allows for visibility into your risk environment to support your assessments.
 - Best-in-class programs will have an "always live" control environment where changes and updates can be performed seamlessly and have proper communication and visibility to downstream users.

Step 7: Evaluate Existing SOX Documentation Against Risk Assessment for Changes

Just as your risk needs to be reassessed during your 404b transition, so does your documentation. Documentation is what is used to support your effectiveness testing for your internal and external auditors. In addition, it assists in process adherence and your ability to operate efficiently and can be used as a platform to educate control owners or on-board new staff.

Documentation is expansive and includes, but is not limited to:

Risk assessments

- Risk control matrix, process flowcharts, process narratives, and SOPs
- Certification of work performed or process/control sign-offs, and
- At-the-source documentation of work performed

Due to vast and different forms, documentation is hard to manage, and needs to be timely to be effective. Your compliance tool can greatly impact how difficult it is to capture it, manage it, and how timely it is. A practical way to evaluate your documentation is to:

- Include external auditors in evaluation of your existing documentation early, as they have a stricter standard of documentation to be met
- Leverage technology to help automate and streamline the capture of documentation from at-the-source to sign-off through integrated solutions
- Deploy technology that centralizes and managed key documentation from RCM to process narratives
- Use CFGI's hybrid flowchart to help link your risks and documentation

Consider having an outside party review the existing SOX documentation against your risk assessment for changes. A new perspective can detect control redundancies, identify risks lacking appropriate controls, and expose operational inefficiencies.

While the FloQast survey previously highlighted shows up to 70% of companies rely on internal mechanisms to evaluate their SOX compliance programs, experts (and best practices) are in favor of an external resource. Those outside the organization often are more objective, more knowledgeable, and can bring a more robust judgment to the table.

To practically evaluate existing SOX documentation against your risk assessment, management should install a SOX diagnostic tool that promptly informs management of control redundancies and operational inefficiencies.

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Step 8: Actively Monitor Control Deficiencies and Remediation Plans

There are 3 types of systemic controls: preventive, detective, and corrective. It is possible to manage risk but not eliminate it. Preventive controls will inevitably fail due to a myriad of factors. Even with a best-in-class SOX compliance program, an organization can experience control deficiencies. So long as these control deficiencies are promptly identified and remediated, there should be no cause for alarm. It is critical that detective and corrective controls are put in place to remediate in a timely manner. In fact, in highly effective SOX programs, management should be the primary identifier of control deficiencies, allowing the maximum time to do a root cause analysis and determine a remediation plan. The problem happens when management leaves it to the end of the year to review these control deficiencies. This is a recipe for disaster, as those unremediated control deficiencies may aggregate into significant deficiencies or, worse, material weaknesses. Unidentified or untracked deficiencies can easily spiral into significant deficiencies or material weaknesses.

Management must track all outstanding and remediated control deficiencies for the fiscal year. The best approach would be to track all the control deficiencies, their respective control owners, remediation plans, and the status of the remediation efforts. Management is responsible for assessing the impact of the control deficiencies individually and in aggregate at the end of every quarter as part of their 302 certifications. As noted above, highlighting control deficiencies helps management promptly uncover the root causes. Then, management should design and implement remediation plans to correct the highlighted deficiencies. These efforts should be viewed as continuous improvement opportunities for your SOX controls.

On a more practical note:

- In order to determine if a control deficiency is remediated, management should get reliable evidence over a sustained period to confirm the successful remediation of a control deficiency
- Management should also get agreement with internal and external audit
- Remember that detective and corrective timeliness is a lever that affects the severity and costs of a deficiency



Step 9: Use Technology

Technology use is often a decisive differentiator. Organizations fail or succeed depending on how they can leverage technology. FloQast's Controller's Guidebook series discovered the accountants relationship with their technology, noted as adversarial, routine, or synergistic, had a significant impact on their ability to get their work done and done well along. It also impacted other aspects of the work persona such as burnout, retention/recruitment, share of voice, etc. Unfortunately, most have routine relationships with their technology at best just as many don't find significant value in their SOX compliance programs. There is hope. While just over a quarter are able to find strategic value in their compliance programs, a third have started to see a synergistic relationship.

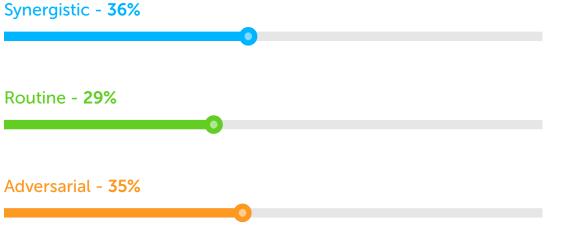
A key characteristic used in identifying whether a relationship was adversarial, routine, or synergistic was by the level of technology integration. The higher the integration the more likely it was to be a synergistic relationship. However, integration should not be viewed as narrowly to major systems such as ERP, data lake, or e-mail. Instead, it should also include integration within its own platform, to workflows, to productivity tools such as Slack or Teams, MS Office Word and Excel or Google Sheets and Docs, file storage such as OneDrive, GDrive, or DropBox.

Other surveys, including the one completed by FloQast, reveal that organizations with more automated compliance and control processes see greater benefits from their efforts. While something as simple as a spreadsheet can suffice, in other situations, especially for big organizations, a Finance governance, risk, and control (FGRC) solution is often the way to go.

FGRC solutions can help reduce the administrative burden of managing a SOX compliance program. Plus, FGRC solutions can provide real-time reporting, which helps management evaluate the effectiveness of an organization's internal control system.

The practical way to use technology and manage the SOX compliance program is to implement an FGRC solution.

Percent of Accounting Professionals by Relationship Type:



technology is a true partner in the accountant's work.

In Synergistic relationships,

In **Routine** relationships, technology is functional but doesn't add value to their work or life.

In Adversarial relationships, technology is seen as a hindrance rather than a help.



Step 9: Use Technology Cont.

First, you should understand that some existing solutions, like your ERP will help support your new program, but you will likely need to invest in more technology. The good news is that a wealth of software and technology solutions exist to help manage these programs with more automation, visibility, collaboration, and agility to respond to changing regulations and resilience. What to look for in a solution?

- Business integrated controls are the goal where instead of waiting until year-end to capture controls, you are executing and capturing controls all year long giving you visibility into the strength of your controls environment and driving audit-readiness.
- The ability to monitor and adjust controls throughout the year with dashboard visibility, as well as look for solutions with the ability to see controls as they happen.
- Enhance control accountability across the organization by clearly delineating between the control and the tasks required to support it.
- Automate control testing by continuously monitoring key controls that alert you to realtime deviations. Automated control testing can also let you analyze large volumes of transaction data to identify exceptions that might indicate a control failure.
- Streamline control documentation and reporting by collaborating between different SOX compliance teams.
- Integration between your Risk Control Matrix, Flowcharts and Narratives to keep everything in sync with descriptions and procedures.
- Provides a centralized data store for supporting evidence.
- Scalability to grow as your company scales and as the regulatory environment grows.
- Enhance security with access controls, data encryption, and security logs that detect and respond to potential threats.
- Integration for a compliance program can be challenging for two reasons: current integrations may not serve your needs, and teams often need to pay more attention to the work required to build integrations. For example, you may need to build new integrations to bring together existing solutions and any new applications you purchase to help support your SOX program. It is important to analyze those integration points and build in time to build in those integrations.

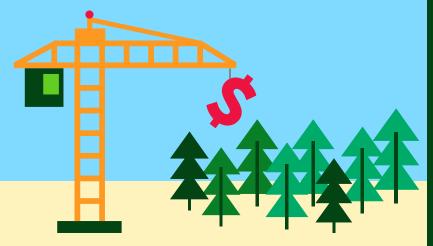


Conclusion

SOX compliance programs can help organizations know their risks at all times, ensure continuous audit readiness, and achieve regulatory compliance. However, surveys show that many companies need more efficient and effective SOX programs. These reasons vary, including failing to use and leverage technology and routinely evaluating their risks. Build a compliance program that goes beyond a check-the-box mentality and empower yours to drive strategic value through enhanced performance, visibility, and agility. Let us help you in your transition to an improved SOX compliance.

About CFGI

Founded in 2000 by former Big 4 professionals, CFGI is an established industry leader with the resources to successfully navigate today's complex accounting, reporting, tax and compliance landscape. An assemblage of top-flight professionals with in-depth public accounting expertise, CFGI is able to fulfill a variety of client needs without the restrictions of auditor independence. With a foundation of knowledge amassed while serving a variety of industries, CFGI is able to guide companies through a wide range of routine and complex business scenarios. The resulting partnership is an innovative resource with the power to address your most crucial accounting, finance and operational challenges.



About FloQast

FloQast, a Finance and Accounting **Operations Platform created by** accountants for accountants, enables organizations to operationalize accounting excellence. Trusted by more than 2,600 accounting teams including Twilio, Los Angeles Lakers, Zoom, and Snowflake – FloQast enhances the way accounting teams work, enabling customers to streamline and manage the Financial Close, Finance and Accounting **Operations, and Compliance** Programs. With FloQast, teams can utilize the latest advancements in AI technology to manage every aspect of the month-end Close, reduce their compliance burden, stay audit-ready, and improve accuracy, visibility, and collaboration throughout the financial function. FloQast is consistently rated #1 across all user review sites. Learn more at FloQast.com.

See our additional resources at: https://floqast.com/mitigate-sox-risk/ https://floqast.com/solutions/sox-compliance/ https://floqast.com/solutions/controls-risk-management/ https://floqast.com/solutions/audit-readiness/ https://floqast.com/solutions/compliance-manager/

