

**Response to Central Bank of Ireland’s Consultation
on the Review of the Corporate Governance Code
for Credit Institutions and Insurance Undertakings (CP69)**

Scottish Mutual International Limited

Section 15 RISK APPETITE

15.8 - The board shall ensure that it identifies risks to be addressed by contingency plans based on the areas where it considers the institution to be especially vulnerable and that these are reviewed, updated and tested on a regular basis.

This point seems specifically focussed on operational type risks where contingency planning would be appropriate (e.g. risk of supplier failure, risk of business continuity events) as opposed to those risks where “stress testing” is more appropriate. Please could you clarify the intended scope of this section and whether the requirements being sought are only in relation to those risks which can be addressed by contingency planning.