

CEO Fraud Response Checklist

- 1. Contact your bank**
 - Give them full details of the amount of wire transfer, the account destination and other details
 - Recall the transfer if possible
 - Have them contact the foreign bank to freeze the funds
- 2. Contact your attorneys**
 - Inform them of the facts
- 3. Contact law enforcement**
 - Identify your incident as “BEC”, provide a brief description, provide complete financial information
- 4. File a complaint**
 - Visit the FBI’s Internet Crime Complaint Center (IC3) at www.IC3.gov to file your complaint with full details of the crime
- 5. Brief the board and senior management**
 - Call an emergency meeting to brief the board and senior management on the incident, steps taken and further actions to be carried out
- 6. Conduct IT forensics**
 - Have IT investigate the breach to find the attack vector, recover control of hacked email accounts, and find any malware remaining anywhere within the network
- 7. Bring in outside security specialists**
 - Bring in outside help to detect areas of intrusion that may have been missed. All traces of the attack and all traces of malware must be eradicated.
- 8. Contact your insurance company**
 - Find out if you are covered for the attack
- 9. Isolate security policy violations**
 - Investigate violations as well as the possibility of collusion with criminals. Take the appropriate disciplinary action.
- 10. Draw up a plan to remedy security deficiencies**
 - Beef up security technology and procedures
 - Bolster staff security training, especially security awareness training



CEO Fraud Prevention Checklist



- 1. Identify your high-risk users such as HR, executives, IT managers, accounts and financial personnel
 - Review each for what is posted on social media, company websites and in the public domain, especially job duties/descriptions, hierarchical information, and out of office details
 - Identify email addresses that may be searchable in the public domain

- 2. Institute technical controls
 - Email filtering
 - Two-factor authentication
 - Automated password and user ID policy enforcement
 - Patching/updating of all IT and security systems
 - Manage your network boundaries
 - Manage access and permission levels
 - Adopt whitelists or blacklists for external traffic

- 3. Policy
 - Institute wire transfer policy, such as:
 - Multiple points of authorization (not just the CEO and one other person)
 - Out of band verification – email and in person, for example
 - Digital Signatures: Both entities on each side of a transaction should utilize digital signatures
 - Time delays for all wire transfer over a certain amount

- 4. Institute policy concerning access to and release of financial information, IP, customer records and employee records



□ 5. Procedures

- Make staff study security policy and enforce this
- Establish how executive leadership is to be informed about cyber-threats and their resolution
- Establish a schedule for the testing of the cyber-incident response plan
- Register as many as possible company domains that are slightly different than the actual company domain
- Implement Domain Spoof Protection
- Create intrusion detection system rules that flag emails with extensions that are similar to company email

□ 6. Cyber-risk planning

- Develop a comprehensive cyber incident response plan
- Consider taking out comprehensive cyber security insurance that covers data breaches and CEO fraud
- Include cyber-risk in existing risk management and governance processes
- Understand what information you need to protect: identify the corporate “crown jewels.”
 - How to store the information
 - Who has access
 - How to protect it

□ 7. Training

- Train users on the basics of cyber and email security
- Train users on how to identify and deal with phishing attacks with new-school security awareness training
- Frequently phish your users to keep awareness up
- Implement a reporting system for suspected phishing emails such as the PhishAlert Button
- Continue security training regularly to keep it top of mind

□ 8. Red flags

- Watch out for fraudulent or phishing emails bearing the following red flags such as urgency, spoofed email addresses, demands for wire transfers