AUDIT REPORT

Agile Teams Delivery Model

Audit Services

FY2024

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Date: November 27, 2023

From: Rao Wandawasi, Director, Audit Services

To Mark Goldberg, Chief Information Officer & VP, Business Technology

Re: AUDIT OF AGILE TEAMS DELIVERY MODEL

I. Introduction

In accordance with the Audit Plan presented to the Audit Committee, Audit Services conducted an audit of Agile teams' delivery process at BCLC. Pertinent BCLC Management and Audit Services have determined the scope of this engagement jointly in a collaborative manner.

The audit report is presented for information and discussion. For the issues identified in the report, an "agreed upon action plan" is developed in collaboration with management. These action plans are tracked by the Audit Services team for timely implementation. Any delays or non-execution of the action plan is compiled and presented to the Audit Committee

II. Objective and Scope

The scope of this audit included testing a sample of the initiatives delivered by BCLC's Agile teams. The objective was to validate aspects of BCLC's Agile operating model. In this regard, areas subject to Audit Services' review included, but were not limited to, the following:

- **Understanding Agile operating model at BCLC:** familiarization with framework, practices, and overall control environment.

- **Review risk management practice:** verify if potential risks have been identified, documented, and adequately addressed.

- **Review team collaboration:** understand the roles and responsibilities of the Agile teams, their stakeholders, and management and confirm if clear accountabilities are established.

- **Assess metrics and progress tracking:** analyze how progress, completion and success is measured and tracked.

- **Assess Agile initiatives' documentation:** review artifacts and confirm that they are properly structured, updated and accurately reflect progress.

- **Determine governance:** verify Agile structure, position within the organization, leadership understanding and support for the practice and training available for all involved.

- **Continuous improvement:** explore opportunities for improvement and provide recommendations to further enhance the performance of Agile teams.

III. Executive Summary

BCLC operates in an Agile model enabling delivery by Agile teams since 2019. There are approximately 400 staff across 38 teams. The teams are involved and contribute towards several key initiatives, products, and processes. Based on the engagement performed, Audit Services is of the opinion that on a five-point scale maturity model, the Agile practice at BCLC is in the 2.2 to 2.4 range.

1. <u>Opportunity to Improve Overall Process Governance and Enhance Vision Alignment for Delivery</u>

There is no visual map at the organization level, from a product taxonomy and portfolio view that demonstrates how Agile teams' activities support corporate priorities, thus making it difficult both for the customer/stakeholders and the Agile teams to understand their position and role from an overall organization's perspective.

Additionally, a clearly defined, universally well understood across Agile teams, and tailored operating model does not exist to address core Agile elements like Governance (who and how decisions are made), Organization (structure and resources), and Process (steps to get activities completed).

2. <u>Leadership Support and Personnel Development</u>

There is a lack of comprehensive understanding and direction from sponsors/leaders about Agile, its relevance, importance, and Agile role in contributing towards organizations success.

At the operational team level, roles, responsibilities, and accountability of key personas are not clearly defined, widely communicated, or consistently practiced. All of this causes confusion and affects Agile teams' performance and final deliverable.

3. <u>Enhance Process to Better Address Current Alignment Issues</u>

There are several cultural elements that contribute towards the successful making of an Agile operating model. For example, open error culture, purposeful aspirations, open communication, etc. BCLC should focus on all these cultural elements and create an atmosphere where they exist/thrive for the benefit of the Agile model and the resulting overall success of the organization.

Silos do exist in operations at team levels, thus impeding Agile from achieving its intended goals. The Agile teams tend to be functionally specialized but at times disconnected from each other.

4. <u>Improve Process to Better Prepare for Future Development</u>

Agile model is a relatively new paradigm shift that requires a change in mindset and reporting structure. BCLC does not have a formal change management function for seamless Agile practice acceptance, adoption, and implementation.

Furthermore, key Agile performance metrics are not universally utilized by Agile teams to track progress or aid in decision making. This is compounded by lack of clarity on who is responsible for running and reporting metrics.

Conclusion:

In conclusion, the various Agile teams and the overall Agile practice are operating and contributing towards organization's growth and development. However, there is opportunity to further structure processes in different areas within the department which will result in greater deliverable, better operations, and further gains for the organization.

Additionally, attention to aspects highlighted at the governance level and elements at operational level within teams will further staff engagement and increase stakeholder acceptance. Finally, it will aid in maturing the overall Agile model at BCLC which can be one of the underlying pillars for organizations growth and success as BCLC embarks on this journey of accomplishing the new strategic plan in an exciting and challenging business environment.

IV. Agile Explained

Agile is a methodology to deliver products and services by breaking down the entire project into phases or sprints and working on delivery to the market or stakeholder in the fastest time. It emphasizes collaboration with cross functional teams, transparency, quality, feedback loops, and continuous improvement.

The four core values of Agile methodology are i). individuals and interactions over process and tools, ii). working software over comprehensive documentation, iii). customer collaboration over contract negotiation, and iv). responding to change over following a plan.

In early 2001, at the age of software, a group of software experts produced the "Agile Manifesto". The document highlights 12 principles of Agile, per the picture below. BCLC applies these principles according to business context and operating environment.

Agile delivery involves the following:
  a. Agile teams deliver tested functional and tangible products (Minimum Viable Product – MVP)
  b. Products/services will be delivered at the fastest time to the market/stakeholders (two-to-four-week sprints). At BCLC we operate in a model that best suites our business needs.
  c. Continue to improve process/practice through feedback loops from previous sprints.

V. Agile at BCLC

A. Introduction

BCLC started its Agile transformation journey in 2019. The aim was to:
  a. Deliver more value frequently to our customers.
  b. Improve our processes to make it easier to get work done.

Since inception the organization has evolved from initial adoption to operational stage and has made good progress. As of September 2023, there are 38 Agile teams with approximately 400 staff within these teams.

> **Organizations that master the Agile means of production have a better chance to both survive and thrive through the digital transformation age.**

As the Agile model evolves further, the department will look into many scaled models and pick the best elements that suit our organization and context, to align teams to work towards shared goals.

B. Maturity

    a. Few teams thrive and have aligned leadership understanding and support, implemented metrics and use them for feedback loop and continuous improvement.

    b. Few other teams are not fully bought into the Agile way of working and use few Agile tools. They still work in part within the traditional waterfall way.

    c. Majority of the teams are at the mid-point of the maturity scale, with certain processes defined but still exploring ways to fully implement and reap the Agile benefits.

KPMG Agile @ Scale Maturity Model
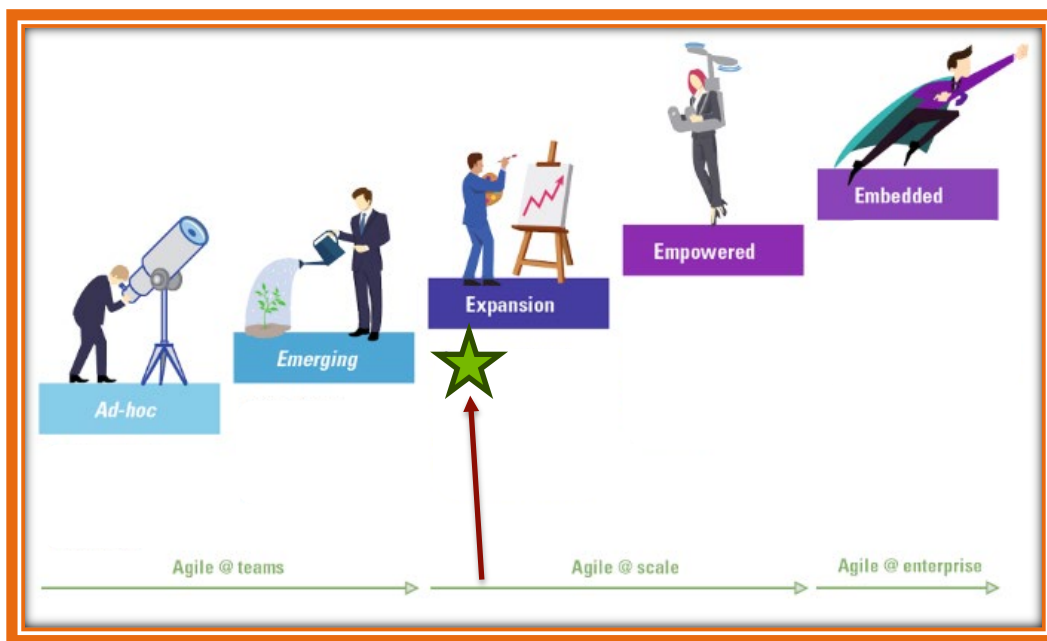
Maturity Level	Description
1. Ad-hoc	Some scattered initiatives may be present, but there is no focus on consistency.
2. Emerging	Agile delivery processes and habits are emerging, primarily at a team level.
3. Expansion	Teams are starting to mature and various single scaling efforts are in place. There is no coherent and consistent adoption.
4. Empowered	Holistic adoption of agility, based on clear agile ambitions and strategy. Empowered teams are scaled consistently and effectively.
5. Embedded	The organization is culturally and operationally agile on an enterprise level. Continuously learning and improving are driven by mastery and purpose.

Overall, the Agile maturity at BCLC is at the "early stages of Expansion Level".

For BCLC, now is a good time to assess the Agile operating model and adjust, if required, so teams across the organization can work collaboratively to deliver the new corporate strategy more effectively and efficiently.

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VI.   Details of Key Issues

1.   **Opportunity to Improve Overall Process Governance and Enhance Vision Alignment for Delivery**

> A well-established Agile governance structure and organizational alignment is a powerful way to create collaborative objectives, maximize employee skills, motivate staff, and promote positive company culture. Understanding the importance, benefits, and ways of achieving organizational alignment with good governance will help BCLC be more effective with its Agile practice and aid in the accomplishment of organizational goals.

OBSERVATIONS:

A. No Visualiziation

While our corporate strategy outlines numerous priorities, there is no visual map at the organizational level that demonstrates how Agile teams' initiatives support the corporate priorities, as well as the interdependencies among the Agile teams. Visualization is needed to identify what products we have, which Agile teams support the specific product, what the initiatives and core work items are, and the dependencies among multiple Agile teams. This should help establish responsibilities and accountabilities for successful delivery and product hand over to business.

B. No Clarity on Enterprise Delivery Model

The Agile operating model helps organizations to connect strategy to execution. Further it breaks down silos, provides more control over the program, and interacts with the rest of the organization. Per the Boston Consulting Group (BCG) the various elements of Agile operation model are highlighted in the picture below:
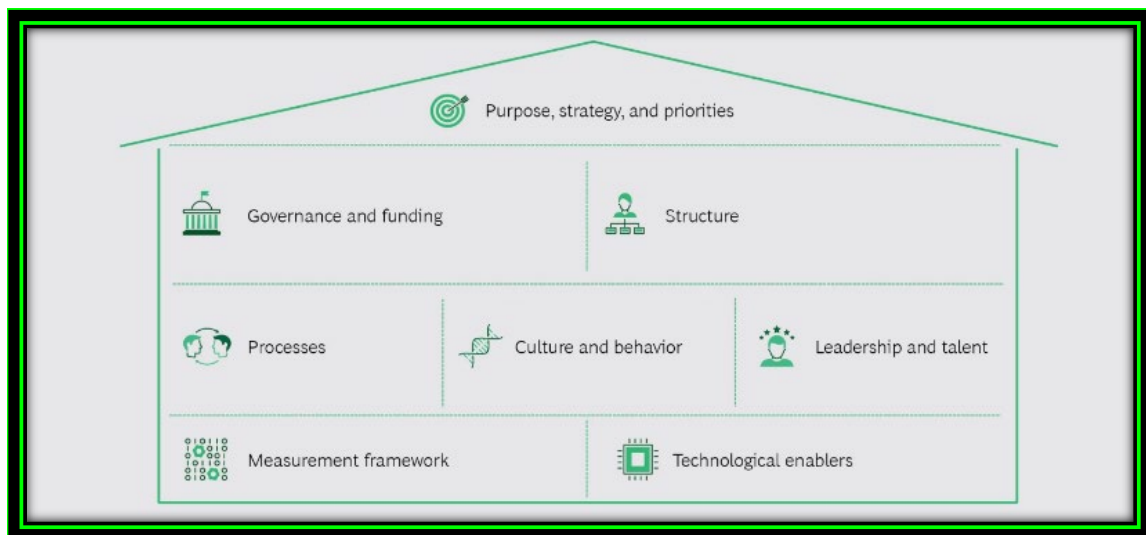
BCLC does not have a clearly defined and tailored delivery model to address the core elements across the organization. For example:

a.   Governance (by whom and how decisions are made).
b.   Organization (structure and resources).
c.   Process (steps to get activities completed).

C. Product Mindset is Vague

It is a mindset focusing on "Outcomes", with an aim to increase "Value" to customers/stakeholders, with attention to "Time". Overall, it encompasses MINIMIZE TIME TO VALUE. To achieve this and be successful from an Agile perspective, there are a few underlying requirements for Product Owners within the Agile teams:

a. Clarity on products and services they own.
b. Understand how their activities impact business value.
c. Who is accountable for delivering success.

For multiple teams the above is unclear or not well articulated. This causes challenges in product delivery.

D. Value Steram Mapping (VSM) Non-Existing

VSM in Agile allows leaders, teams, and stakeholders to view the following:

a. Create better alignment across teams.
b. Identify areas where value delivery is slowing down, or challenge exists.
c. Provides visual depiction, helps link work to customers.
d. Helps product owners prioritize tasks, identify bottlenecks, and remove non-value activities.

> **Agile teams produce a continuous stream of value, at a sustainable pace, while adapting to the changing needs of the business.**

Additionally, linking business value to activities will also help improve BCLC's current demand management process, which lacks a systematic approach to forecast, plan, and manage demands. Stakeholders' demands are currently not evaluated based on standardized scoring system linked to business outcomes and value.

At BCLC there has never been an end-to-end business value stream mapping performed since the inception of Agile. Part of the reason is that the Agile teams were built around organizational charts and departments instead of products and business value.

> **It is important to align. Otherwise, it is like building a house on a shaky foundation.**

IMPACT:

Agile as a whole and the different teams within, will not be able to operate at optimum efficiency and deliver effectively for the benefit of the organizations, due to these issues. Further, these are all foundational blocks, without which it will be impossible to mature Agile as planned/intended.

AGREED UPON ACTION PLAN:

All aspects highlighted above will be discussed, various solution options considered, apt solution finalized & developed and appropriately implemented.

RESPONSIBLE PERSON:

Gary Foster, Director, Enterprise Services – Leading and working with Product Management leadership.

(Ash Kosmadia, Charlene Nielson, Emily McDonald, Garth Pieper, Ian Rowe, Jerry Williamson, Martin Lampman, Mike Hays, Nathan Krystal, Shirley Beveridge, Trevor Penner, and other Sr. Leaders as needed).

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2. Leadership Support and Personnel Development

Supportive leadership is an integral leadership style as it fosters positive relationships between employees and ultimately empowers team members. Leadership has to be proactive, supportive and remove obstacles. Also, the organization has to establish a training framework and ensure adherence to the same for quality work and deliverable due from the Agile practitioners.

OBSERVATIONS:

A. Clear Understanding and Support for Agile from Leadership

Organization and leadership need to clearly understand why Agile is important for the organization and why the Agile practice should succeed. There is no record indicating leaders have taken Agile training to better understand Agile principles, methodology, approach, and benefits. Furthermore, product training is not integrated into the current Agile training package. Comprehensive understanding and direction from the leader/sponsor will contribute tremendously to the functioning, success, and overall positive organizational opinion on Agile practice.

At BCLC, there are varied views on the overall Agile practice and its success. Additionally, different, and conflicting responses are received on why Agile practice exists, its purpose, roles, teams, and ways of working. This highlights a lack of common understanding of:

a. Why Agile at BCLC.
b. How Agile is expected to contribute towards organizational success.

> If an Agile initiative does not have the direct or even indirect support of the leaders/sponsors running the team, chances are good that attaining success will be a constant struggle for all involved parties.

B. Roles and Responsibilities

Roles, responsibilities, and accountabilities of the key personas (Product Owners, Project Manager, Scrum Master, Agile Coach and Capability Manager) in an Agile team are not clearly defined, widely communicated, or consistently practiced. Audit Services review highlighted the following:

a. RACI Chart (Responsible, Accountable, Consulted, Informed): A RACI chart exists on the s. 15(1) page but has only been shared with capability manager and a few Agile teams. The roll-out is not yet complete.

b. RACI Chart Legends: Legends on RACI chart are not distinctively defined. For example, in the table below, legend "C->R" means Consulting could move to Responsible and legend "R->A?" means Responsible could move to Accountable. C, R and A appear to be fluid leading to confusion.

Focus Area	Description	Product Owner
Product Management & Administration	Own and manage BT Contract	C->R
	Own and manage BT budget approvals and mgmt.	C->R
Agile adoption, High performance, and Continuous Improvement	Ensure teams are accountable (own what they deliver, how they deliver)	R->A

c. Product Owner: The Product Owners (PO) are unclear if they have ultimate accountability for delivering success. It varies among different Agile teams.

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d. <u>Scrum Master:</u> The role of Scrum Master is not full time at BCLC. They have shared responsibility and perform multiple duties leading to confusion, burnout, and lack of continuity.

e. <u>Agile Coaches</u>: Agile Coaches are shared across multiple teams. The Coaches feedback meeting with team and leadership or the one-on-one meeting with Product Owners (PO) are not consistently performed across all teams. Additionally, POs are unsure on Coaches role in:

- Delivering success.
- Escalating system issues to leadership.

f. <u>Confusion in Assigning Resources:</u> Certain POs, Capability Managers, and Project Managers are not aligned on who is responsible/accountable for resources assignment to the Agile teams.

C. Team Member Development

"Sprint 0" is BCLC created training package and is available to all Agile teams along with LinkedIn courses. On reviewing the overall training protocol, Audit Services noted the following:

a. <u>Mandatory Certification Training:</u> Currently, other than agile coaches, there is no certification requirement for other key personas like product owners and scrum masters. In general, training equipes Agile team members with:

- Specialized in-depth knowledge and consistent understanding of Agile practice and concepts.
- Validation of expertise in the field, which boosts credibility with stakeholders and colleagues.
- Belief and empowerment to take on more challenging initiatives.

b. <u>Training Record Management:</u> For the benefit of Agile team leaders and organizational leadership, maintaining records of onboarding training and supplementary training for Agile team members is preferred. However, currently due to lack of capacity, there is no centralized training records maintained.

IMPACT:

Lack of leadership support and clear understanding of each persona's roles and responsibilities within the Agile team could hamper alignment, communication, and collaboration which are all detrimental to the success of the Agile team.

Proper training, certification and common understanding are better practices and hence vital for Agile to thrive, succeed and provide the expected results and benefits to the organization.

AGREED UPON ACTION PLAN:

Focus on the highlighted issues and develop the following:
- Develop and share with leaders' material detailing leadership role and expectation of them.
- Work on ensuring the roles and responsibilities is clear with no ambiguity. Once finalized, this will be shared with all Agile teams.
- Ensure there is proactive, robust, and comprehensive approach to assess the effectiveness of Agile training.

RESPONSIBLE PERSON:

Gary Foster, Director, Enterprise Services

**COMPLETION DATE
MARCH 31, 2025**

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3. Enhance Process to Better Address Current Alignment Issues

A well operating Agile practice helps organizations deal with challenges of a constantly changing ecosystem and aid in staying ahead of competition. Agile methodology helps create business value, focuses on customer simultaneously being quick to market, efficient and effective.

Any impediments to the successful functioning of the Agile practice should be looked into and addressed.
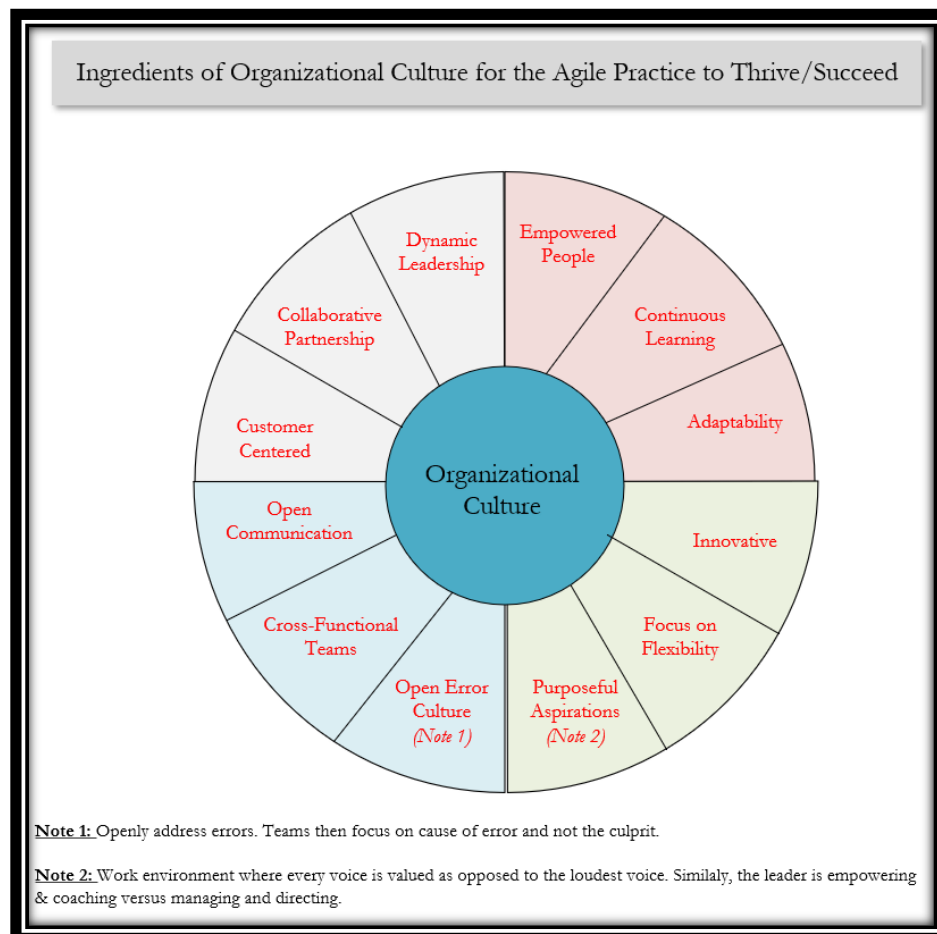
OBSERVATIONS:

A. Organizational Culture

Organizations that have been in existence for multiple decades have their own established and organic culture. They have certain ways of performing activities and completing tasks.

Adapting Agile is a sweeping change. Based on culture and prior operating methodologies organizations need to be open to breaking down silos, have an experimental mindset, constantly improve, and innovate.

A list of key cultural aspects required for an Agile operation model for delivery to succeed are highlighted in the picture below:

Ingredients of Organizational Culture for the Agile Practice to Thrive/Succeed

Dynamic Leadership · Empowered People · Continuous Learning · Adaptability · Collaborative Partnership · Customer Centered · Open Communication · Cross-Functional Teams · Open Error Culture (Note 1) · Purposeful Aspirations (Note 2) · Focus on Flexibility · Innovative · Organizational Culture

Note 1: Openly address errors. Teams then focus on cause of error and not the culprit.

Note 2: Work environment where every voice is valued as opposed to the loudest voice. Similarly, the leader is empowering & coaching versus managing and directing.

BCLC must focus and ensure all key cultural elements listed above for a successful Agile operating model continues to exist within the organization and across all teams. Any element missing should be worked on and addressed. Additionally, these elements must periodically be reinforced by leadership.

B. Functional Silos

The entire premise and mindset required for a successful Agile model is collaboration, communication, and knowledge sharing achieved through a cross functional business model. Operating in silos is a major obstacle that impedes Agile from achieving its intended goals.

At BCLC the Agile teams tend to be functionally specialized but at times disconnected from each other. For example:

a. Teams working on (focusing) sprints and tasks that are important for them, as opposed to prioritizing tasks that are corporate priorities.

b. Agile Coaches facilitate showcase meetings to review key highlights, performance, and risks. These meetings do not occur quarterly as required and when scheduled, attendance of pertinent members is not guaranteed. This makes collaboration difficult and limits scalability.

C. Technical Skill Gap

Audit Services noted skills gap in certain technical areas based on Agile teams' composition, and inputs from different Agile team members. Details are as listed below:

a. Senior technical resource: Responsible for designing and managing complex systems owned by the Agile team and ensure these systems operate efficiently and reliably.

b. Technical Lead: Acts as Air Traffic Controller, understands how different organizational systems and applications interact.

D. Results of Testing Specific Teams Operations

Audit Services selected two teams Player Account Management (PAM1) and Loyalty Enablement and tested their compliance to BCLC technology capability standard. The standard is specific to software, change and release management, software development and Quality Assurance (QA).

Results of the tests are detailed below:

a. QA Documentation: Test details and results are stored in multiple locations (s.15(1)   ). There is no link between the two systems, thus causing issues. Audit Services noted this practice across all Agile teams.

b. Regression Testing: These tests help ensure changes to the code have not introduced new bugs. One of the team does not always perform this test. The relevant QA team decides if a regression test is required and documents the decision in Teams group chat. This platform deletes history in 90 days. An important decision whether to perform or not perform a key test is not appropriately documented, nor is it available after 90 days of entry.

c. Web Release Management: PAM1 team is using s.15(1) (tool used for release management), which will be decommissioned by January 2024. The team will need to transition to another tool, s.15(1) to align with Business Technology (BT) capability standard.

IMPACT:

The various aspects listed above impact the Agile model today. Although the different Agile teams are evolving and making progress, these highlighted issues are stifling the Agile teams from further contributing to organizations growth and success.

Aspects highlighted like culture and silo mindset have far reaching impacts. The sooner they are looked into and addressed, it will benefit the different Agile teams and the organization as a whole.

AGREED UPON ACTION PLAN:

Define and document clear Agile frameworks and guardrails for all teams. Create consistent and transparent reporting on team alignment to the frameworks and guardrails to ensure gaps and leading indicators are highlighted for the issues highlighted above.

Frameworks and guardrails should be shared and understood by the broader leadership team across BCLC to support more understanding and support of our Agile delivery frameworks.

RESPONSIBLE PERSON:

Gary Foster, Director, Enterprise Services

**COMPLETION DATE
MARCH 31, 2025**

4. Improve Process to Better Prepare for Future Developments

> Organizations need an experimental mindset and be willing to innovate. There is a need to move away from the "tried and tested" attitude to change and be creative to fully benefit from Agile practice. Additionally, there must be an accurate performance measurement methodology to determine how the Agile practice is aiding and supporting the organization to succeed.

OBSERVATIONS:

A. No Formal Change Management Practice

It is not easy for all to relinquish old ways of doing things and accept Agile principles, concepts, and methodology. Agile is a new business paradigm that requires a change in mindset and reporting structure. There are different reasons why employees push back on change, namely:

a. They do not buy into the concept.
b. Discomfort or bias against anything new.
c. Defiance to change.

It is pertinent that all are clear on the WHY for Agile. Having a strong change management can support the full adoption and usage required for Agile results to be achieved at the level expected.

> **Failure is not fatal, but failure to change might be.**

BCLC does not have a formal change management function for Agile acceptance, adoption, and implementation. Additionally, it will facilitate communication of key changes during the Agile journey.

B. Performance Metrics Monitoring

The underlying principle of performance monitoring in Agile setup is adaptability, continuous monitoring, tracking progress and resulting changes for efficiency and alignment to organizational goals and objectives.

Few Agile teams like Application Platform Delivery (APD) regularly perform metrics monitoring, tracking, and analyzing. The chart below is one of the examples of the APD team's metrics.

Post Sprint Performance Analysis
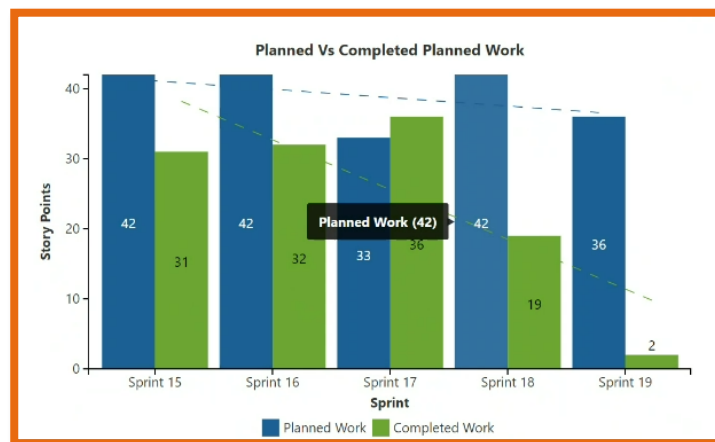
> **If you do not collect any metrics, you are flying blind. If you collect too many, it may then be obstructing your field of view.**

Performance metrics for example, sprint velocity, work break-down and capacity planning are defined but are not universally utilized by all Agile teams across BCLC to track progress report results and make informed decisions.

The underlying root cause for this behaviour are:

a. <u>Lack of clarity on Responsibility:</u> It is unclear who runs metric reporting. Need to clarify who individually or jointly own this responsibility.

b. <u>System shortcoming:</u> Teams have been provided with standards, however, not all teams use them. They do not use the common system to ensure accurate labeling of [s.15(1)] tickets which is the source data used to generate reliable metrics reporting.

C. Inconsistent Restrospective Meeting

Retrospective meetings are conducted within the Agile team after iteration completion or at the end of project milestone. The purpose is to discuss what worked well, what did not and action to incorporate into future iterations.

On review it was noted these retrospective meetings are not conducted regularly or at times conducted, but the meeting minutes not maintained appropriately. This results in teams:

a. Inability to reflect on performance.

b. Unable to incorporate learnings into future iterations.

This could prevent knowledge sharing and continuous improvement opportunity to other Agile teams.

D. Maturity Assessment Not Conducted

Per best practices from an Agile perspective, it is recommended maturity assessment be conducted quarterly. BCLC's Agile Practice guidelines also recommends:

a. Quarterly maturity assessment.

b. Templates for the assessment are provided on [s.15(1)]

c. Assessment be performed by Agile coaches with scrum master support.

> **Agile is not your goal – it is only a tool to achieve corporate goals and strategic objectives.**

These maturity assessments were performed by one Agile team for three quarters back in 2019. Apart from that, there was no other maturity assessment performed across teams over the years since inception of Agile practice at BCLC.

Non performance of maturity assessment hinders Agile teams and in extension the organization from:

a. Identifying weakness and areas for improvement.

b. Highlighting opportunities for growth and development.

c. Determining how well Agile practice is performing and delivering towards organizational growth.

Teams attempt to address the lack of maturity assessment through other avenues, for example showcases, special workshops, etc.

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IMPACT:

Agile has been here at BCLC since 2019. Although there has been progress and inroads of the Agile model, there is opportunity to further streamline the process to make greater contributions towards organizations growth.

Nonexistence or limited existence of the above listed activities hinder Agile model progress to the next level of maturity. This in turns effects the level of business acceptance of Agile, leadership support and level of cooperation and collaboration across teams.

AGREED UPON ACTION PLAN:

A framework will be established to measure the maturity of each Agile team and how well it delivers within the delivery framework selected by the team. The team will also be measured on its ability to meet core requirements of our Agile model and definition of done for product increments where applicable.

RESPONSIBLE PERSON:

Gary Foster, Director, Enterprise Services

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5. Other Supplementary Aspects to Consider to Better the Agile Operating Model

OBSERVATIONS:

A. Agile Teams and Third-Party Service Providers

There are several third-party vendors and service providers working with BCLC Agile teams but are unfamiliar or unwilling to be trained in Agile methodologies. For BCLC Agile teams collaborating with these outside vendors or service providers, they experience:

a. Frustration due to the vendor's current process not being in alignment with Agile methodologies.

b. Lack of required level of collaboration which is an integral element for Agile operation success.

c. Both parties working at different pace and timeline causing challenges in collaboration.

One example is there are six Agile teams working with Openbet for various services. BCLC relies on Openbet for one of the primary functions of organization's core business – iGaming. Audit Services review of this working highlighted the following:

a. There is no clear clause or service level agreement to establish expectation and performance standards (i.e., response time, defect resolution or sharing of documentation).

b. Vendor performance review is conducted on a quarterly basis, but the evaluators do not include all key stakeholders involved in vendor's product and service. Additionally, a formal process to develop, execute and monitor actions addressing issues identified in the review is not established with Openbet.

c. There is an accountability gap on owning the relationship with Openbet. It is unclear who at the leadership level is responsible to communicate expectation, monitor performance, proactively address issues, and ensure resolution.

B. Inconsistent Performance of Risk Management

For the Agile teams involved in different initiatives, a threshold for performing risk management is not established nor is there a structured and standardized risk management practice within the different Agile teams.

Large projects for example Saskatchewan Indian Gaming Authority (SIGA) employ formal risk management and document the same. Agile teams working on smaller initiatives adopt an informal ad-hoc approach, where risks are discussed at the team level but not documented. Therefore, they are not available for future reference, resource allocation, or informed decision making.

IMPACT:

If the third-party service providers and vendors are not operating per the Agile methodology when working with our Agile teams, it creates a lot of friction and challenges impacting team engagement and quality of the deliverable.

Risk management thresholds if not appropriately set and communicated across Agile teams will result in ad-hoc risk review, without appropriate documentation and improper utilization or non-utilization of risk information for decision making.

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AGREED UPON ACTION PLAN:

Prioritization and Engagement models need to be developed with critical delivery partners to ensure there is a more holistic approach to prioritize work with our partners that aligns to multiple BCLC teams and ecosystems.

RESPONSIBLE PERSON:

Business Owners of Critical Vendor Relationships

COMPLETION DATE
MARCH 31, 2025

Appendix I

DESCRIPTION OF SYSTEMS REFERENCED

System	Description
s.15(1)	Is used in software development for the purpose of tracking and managing tasks, projects, and issues
	Is a collaboration and documentation tool. It helps teams to create, share and collaboration on content, documents, project plans, meeting notes, and more.
	Is a test and quality management tool that helps with software test planning, test execution, integration, defect management, and reporting and analytics.
	Is used in building code, running tests, and deploying applications and enabling continuous integration.
	Is a centralized version control system in software development that tracks changes and is used for release management.

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AUDIT REPORT

FRAUD MANAGEMENT

Audit Services

FY2024

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Date: December 22, 2023

From: Rao Wandawasi, Director, Audit Services

To Marie-Noelle-Savoie, Chief Compliance Officer and VP, Legal Compliance Security

Re: FRAUD MANAGEMENT

I. Introduction

In accordance with the Audit Plan presented to the Audit Committee, Audit Services conducted an audit of BCLC's Fraud Management procedures. Pertinent BCLC Management and Audit Services have determined the scope of this engagement jointly in a collaborative manner.

The audit report is presented for information and discussion. For the issues identified in the report, an "agreed upon action plan" is developed in collaboration with the management. These action plans are tracked by the Audit Services team for timely implementation. Any delays or non-execution of the action plan is compiled and presented to the Audit Committee.

II. Objective and Scope

The objective of this review was to validate aspects of BCLC's fraud management program, the corporate governance frameworks, and policies responsible for current anti-fraud initiatives, corresponding training and communication, and the whistleblower reporting process. Areas subject to the Audit Services review included, but were not limited to the following:

- Determine the impact of fraud in top risk areas,

- Identify and assess anti-fraud control effectiveness in the following areas:
  - o Gaming activities in both the Casino and PlayNow environments (external),
  - o Procurement (internal), and
  - o Asset handling (internal).

- Assess the consistency in using standardized processes,

- Determine opportunities to combat ongoing fraud risks, and

- Evaluate how the organization is preparing for the future and compare it to industry best practice standards.

III. Executive Summary

Managing, mitigation and reporting on fraud and the existence of an underlying Fraud Risk Management (FRM) program exists within BCLC. But it needs to be further strengthened, streamlined, and supported to reap the full value and benefit for the organization from the viewpoint of managing fraud and fraud risk.

It is well understood and accepted that you cannot find what you are not looking for. Effective FRM cannot be just passive or reactionary, but it needs to be active in looking for fraud in critical, high-risk areas. Activities that need to be performed consistently are:

a. Performance of fraud data analysis (first line of defence).
b. Compliance monitoring and validation (second line of defense).
c. Fraud focused audits or other workshops (third line of defence).

In a challenging ecosystem and high-risk operating environment BCLC is performing well in terms of fraud and fraud risk. However, there are opportunities to elevate fraud related processes to a higher level and mature the overall FRM program. These are highlighted in the issues listed below.

1. Opportunity to Elevate and Strengthen the FRM Program

FRM program is a comprehensive framework detailing the approach, steps and various elements required for robust fraud management and fraud risk mitigation. BCLC follows elements of this program; however, there are gaps. Aspects that should be present and well established for an organization like BCLC are lacking or insufficient, thereby impacting the extent to which fraud is managed. Elements of the FRM program that are still evolving or non-existent are – Roles & Responsibilities, Commitment, Fraud Awareness, Reporting Procedure, Corrective Action, and Continuous Monitoring.

2. Awareness of Key Fraud Areas and Corresponding Leadership Focus to Manage Appropriately

Areas to be mindful of for fraud, isolated individual events versus their cumulative effect, frauds internal and external to BCLC and frauds in various business channels, all are highlighted. They include:

s. 15(1)

3. Strengthen the Whistleblower Program and Fraud Training

Whistleblower program is such an important element in the organization's effort to manage fraud and gain awareness from all quarters of the business. BCLC has a whistleblower program which is currently being reviewed and streamlined. However, there are a few key elements within the whistleblower program that require attention. They are – Awareness, Follow-up Action, Reporting Options, and Independence in Investigation.

Additionally, focus should also be on fraud training to help ensure information and awareness exists across the organization.

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4. Review Fraud Related Elements and Address Gaps

To elevate fraud maturity within the organization and ensure FRM program delivers the desired results in fraud mitigation and fraud risk management, there are a few key aspects leadership needs to be aware of and manage appropriately. They are:

a. Transparency.
b. Focus on corporate culture.
c. Remove negativity attached to fraud.
d. Responsibility and accountability for fraud at executive/senior leadership level.
e. Definitions and policies.

Conclusion:

BCLC has a good grasp of fraud from a process perspective and the FRM program exists. However, given the nature of the industry we are operating in, size of the organization, volume of patrons, and dollars within the system, and the constant Ministry/Regulators and stakeholders focus on the organization's ability to handle fraud events and mitigate fraud risk, further effort, focus and streamlining of processes are required.

Attention to fraud and FRM program becomes that much more important and an immediate requirement, especially when there is an ideal external environment that helps all three elements of the fraud triangle thrive – motivation, opportunity, and rationalization.

IV. Background and Importance of FRM Program

Fraud has persistently posed a risk in the realm of business. To pinpoint this risk, anti-fraud experts employ the 'Fraud Triangle', consisting of Motive, Opportunity, and Rationalization. The ongoing pandemic has exacerbated all three elements, intensifying financial pressures due to economic conditions, reducing staff levels resulting in potential weaker adherence to standards, and instilling a belief that the fraud is justified due to the current financial pressures.

Recognizing this backdrop, the Office of the Auditor General (OAG) of British Columbia heightened its emphasis on fraud risk management. Public sector organizations have been tasked with fraud detection and prevention to shield themselves from revenue losses and reputational harm. Regulatory frameworks now obligate organizations to establish rigorous fraud management programs. BCLC, a player-centric organization generating revenue through casinos, lotteries, and online gaming (PlayNow.com), must maintain a robust fraud management system comprising of a comprehensive fraud risk management program, a well-defined fraud policy, established whistleblowing and fraud hotlines, accurate reporting channels, and a strong investigation process to safeguard its reputation and its patrons.

Having a robust fraud management strategy for BCLC is critical to positively impact all facets of the business. Following are some of the aspects highlighting the importance of fraud management:

a. Provide a positive player experience: Providing a positive gaming experience to players through casinos, lottery, PlayNow.com gaming platforms and maintaining integrity of gaming activities is of utmost importance to preserve trust and loyalty among players.

b. Prevent damage to the brand and reputation: Fraud can damage BCLC's brand image and reputation. Having a strong fraud management framework will reduce the instances of fraud. It will also help in effectively managing and properly reporting fraudulent events.

c. Regulatory requirements: BCLC must comply with all the applicable regulations of Gaming Policy and Enforcement Branch (GPEB) and Gaming Control Act with respect to fraud management.

d. Social purpose: To achieve BCLC's social purpose of generating win-wins for the greater good, a robust fraud management policy will help identify, manage, and control fraud effectively and efficiently.

e. Significance of controls: All organizations are susceptible to fraud. All fraud cannot be prevented, nor is it cost-effective to try to prevent it. Preventive controls play a key role in deterring fraud from occurring and detective controls help identify fraud if they were to occur.

A few statistical details to highlight the importance of fraud management:

a. Increase in number of fraud incidents post pandemic: As per Canadian Anti-Fraud Centre (CAFC) 2021 report, $165 million were reported victim losses in 2020 which drastically increased to $379 million in 2022 (130% increase).

b. Anti-fraud programs: Association of Certified Fraud Examiners (ACFE) in their 2022 Report to Nations indicated over 80% of organizations have already implemented one or more changes to their anti-fraud program in response to the pandemic.

Note: This audit involves further analysis and deep dive, building on the Fraud Management Program – Gap Assessment performed by the Enterprise Risk Management Services (ERMS) earlier in 2023.

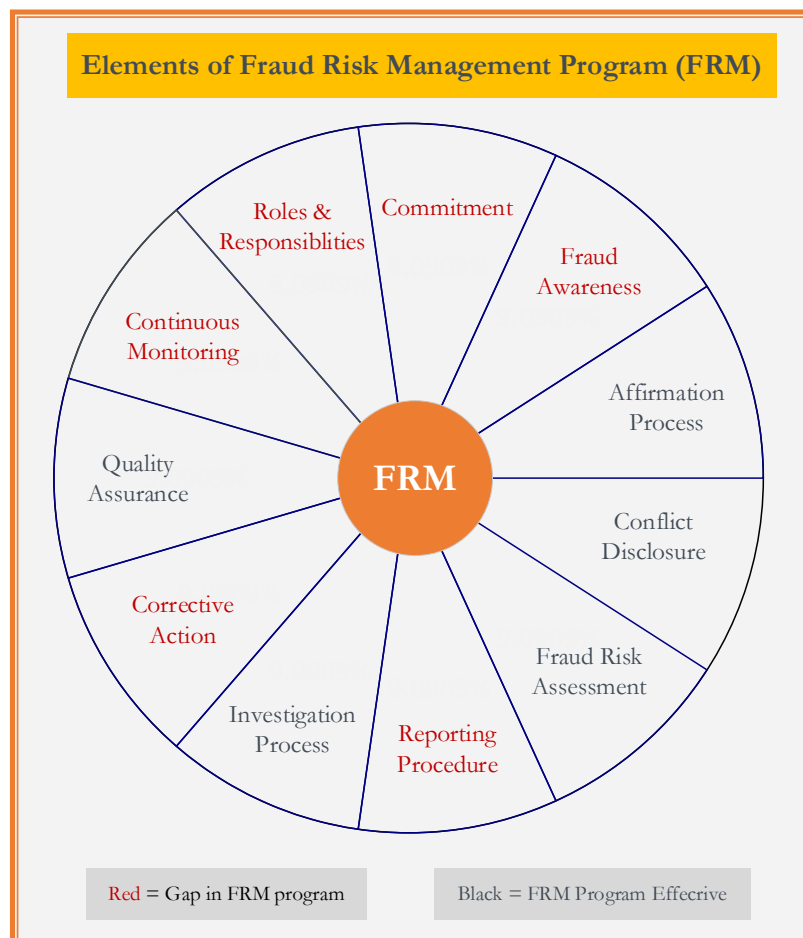
V. Details of Key Issues

1. Opportunity to Elevate and Strengthen the FRM Program

Stakeholders have heightened expectation of ethical behavior from organizations, and regulators have increased compliance requirements. Organizations must respond to these increased expectations from multiple stakeholders.

OBSERVATIONS

The first step in having a robust fraud mitigation process is to focus and elevate the fraud risk management program and its related governance. This will significantly reduce the fraud risk exposure of the organization.

Per the ACFE, the fraud risk management program consists of 11 elements. Audit Services has leveraged the Association's guiding principles in detailing this issue. The chart below lists the 11 elements and highlights elements within where BCLC is lacking in its completeness.

Elements of Fraud Risk Management Program (FRM)

Roles & Responsiblities · Commitment · Fraud Awareness · Continuous Monitoring · Affirmation Process · Quality Assurance · FRM · Conflict Disclosure · Corrective Action · Investigation Process · Reporting Procedure · Fraud Risk Assessment

Red = Gap in FRM program   Black = FRM Program Effecrive

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The gap in the robustness of certain elements within the FRM program are at different levels of understanding and maturity. This affects the organization's ability to appropriately manage fraud risk. These elements are highlighted, and gaps explained in detail through the following section.

A. Roles and Responsibilities

For the program to be effective, everyone involved at all levels of the organization need to clearly know their roles and responsibilities.

a. Board and Audit Committee:
   i. Need to set the tone at the top and be responsible from a governance perspective.
   ii. Stipulate information flow, set agendas specific to fraud, utilize management's business knowledge appropriately and employ any outside expertise, as and when required.
b. Executive Management:
   i. Responsible at the strategic level for the program.
   ii. Work on creating a culture stipulating fraud is not acceptable or tolerated.
   iii. Implement controls and report to the Board.

> **Management holds the primary responsibility for designing, implementing, overseeing, and ensuring the effectiveness of the FRM program.**

c. Senior Leadership and Staff:
   i. To understand their role and an understanding of fraud.
   ii. Keep abreast with related policies and procedures and ensure their implementation.
   iii. Report any red flags, incidents through established channels.

B. Commitment

Communication of commitment towards FRM from the Board and Executives is paramount for the program's success. This can be in the form of a letter that is made available to all employees periodically. It should also be part of the orientation package to all new employees.

This approach will highlight the importance relating to fraud and measures taken by management to ensure controls operate as intended to mitigate the risk appropriately.

C. Fraud Awareness

Training and frequent communication are the two pillars for increasing fraud awareness within the organization. Information to include, fraud definition, example of fraud types based on the nature of industry, steps to be taken by staff if a fraud situation is encountered.

Management should decide on fraud awareness program frequency, attendees, medium of delivery, etc. Additionally, appropriate levels of training should also be provided to the Board on this topic.

> **At times, the ability to manufacture/commit fraud exceeds the organization's ability to detect it.**
>   - **Reason for organizations to be always vigilant, specific to fraud.**

D. Reporting Procedure

Currently, the Investigations team submit a quarterly report of suspected frauds to the Board. This is also reported to GPEB. The organization as a whole should adopt a comprehensive and coordinated reporting methodology factoring the following elements:

a. Identify and report all areas of business with potential high fraud risk.
b. Specify the preventive and detective controls implemented to give Board comfort and confidence on FRM.
c. Indicate if any fraud incidents (perceived, attempted, or actual) occurred for the period of reporting (typically quarterly).
d. Highlight steps taken by management or other regulatory entities to address/close the fraud incident.

This overall method of reporting with full view of FRM will provide assurance and confidence regarding the different steps taken by management to appropriately address fraud. Report to include both internal (within organization) and external (service provider, vendors, retailers, etc.) aspects of fraud.

E. Corrective Action

If a fraud incident were to occur, currently the incident is addressed as needed. Typically, nothing beyond that is undertaken consistently to rectify and treat the root-cause of the incident. Usual activities in a mature fraud set-up, after addressing the fraud incident, include:

a. Postmortem to determine any control weakness that resulted in fraud or fraud incident.
b. Determine if it is a process gap or human element circumventing specified controls.
c. Make appropriate changes to the process to address the gap leading to the fraud incident.
d. Audit Services to review the new process and determine its adequacy and completeness.

F. Continuous Monitoring

There needs to be continuous monitoring, at least for the key fraud areas, by the first line of defence (process owners). This will confirm process and controls are operating as intended.

In certain areas, the existing approach is reactive i.e., if an incident were to occur or is reported, it will be looked into as required. A proactive approach is to periodically monitor the critical and key fraud prone areas and determine the operating effectiveness of the controls. Apart from providing assurance and confidence to management, continuous monitoring will also deter would-be fraudsters.

FRM program exists, but there are areas requiring additional attention and improvement to make it thorough.

> **Fraud as a risk exists in all organizations. It is how best the leadership can manage it that determines the organization's success in addressing fraud risk.**
>
> **A comprehensive and well rounded FRM program is a key tool in managing and addressing fraud.**

IMPACT

Fraud is an ever-existing threat and risk to organizations. One of the key tools to manage this risk is a comprehensive FRM program. If gaps and shortcomings exist in the set-up and operations of this program, it further exposes and impacts the organization's fraud risk and its ability to manage fraud appropriately.

AGREED UPON ACTION PLAN

Areas highlighted as shortcomings and gaps in the report will be reviewed and necessary changes made to the existing process to make the program comprehensive and reliable. Simultaneously, support and inputs from ERMS and Audit Services will be taken as needed to ensure FRM program's effectiveness.

RESPONSIBLE PERSON

Marie-Noelle Savoie, Chief Compliance Officer & V.P. Legal, Compliance, Security

COMPLETION DATE
A-D: JUNE 30, 2024
E-F: SEPTEMBER 30, 2024

2. Awareness of Key Fraud Areas and Corresponding Leadership Focus to Manage Appropriately

> Based on the nature of industry we operate in, the billions of dollars flowing into the system, millions of players playing, thousands of retailers and multiple service provides across tens of locations, there is a lot of action and activity happening all the time.

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RESPONSIBLE PERSON

Kevin deBruyckere, Director AML & Investigations

COMPLETION DATE
DECEMBER 31, 2024

3. Strengthening the Whistleblower Program and Fraud Training

BCLC is committed to achieving high standards in integrity, honesty, and accountability. The methods adopted to ensure adherence are compliance to Standards of Ethical Business Conduct (SOEBC) for employees, promoting a speak-up culture with openness within the system. One of the key tools to achieve this organizational commitment is the Whistleblower Program. It refers to the act of reporting alleged misconduct at the appropriate level in an anonymous manner.

OBSERVATIONS

A. Whistleblower Program

a. Organizational Level Comparison to Best Practices

From a whistleblower program perspective, best practice indicates too many reports or too few reports, are both bad for the organization.

  i. Too many reports could indicate a number of concerning behaviors and improper practices.
  ii. Too few reports or calls could indicate "lack of trust" in the program by the employees. This can further be analyzed to see if all key elements of the whistleblower program exists.

At BCLC, for the 22 months from January 2022 to October 2023 there was one report in the whistleblower hotline. In comparison, for the same time-period, a similar organization in another Province with approximately three times our size, received an average of one call per month.

b. Key Components of the Whistleblower Program
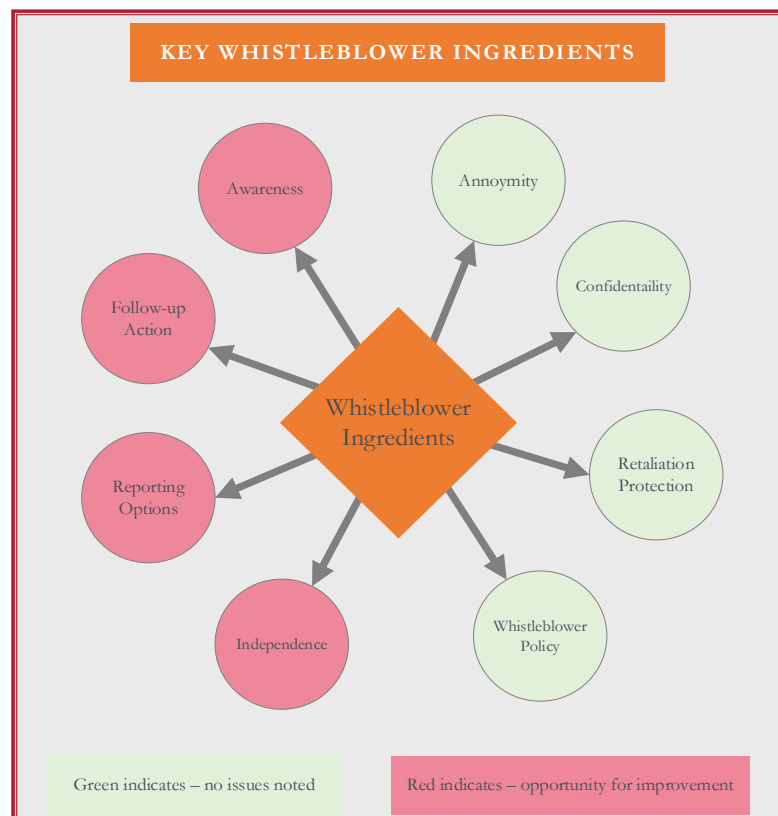
The chart above highlights the key components required for a mature whistleblower program and the components within requiring review and improvement from a BCLC perspective (highlighted in red). These components are further elaborated below:

i. Awareness - *Internally the employees and externally the stakeholders have knowledge and are aware of the whistleblower program. For example, appropriate level of visibility.*

At BCLC, the communication strategy for spreading awareness of the whistleblower program can be improved. The information about the program in SOEBC does not detail the hotline, modes of communication to report incidents, etc. This makes it difficult for employees to report incidents with ease.

ii. Follow-up Action*: Reported incidents should be appropriately investigated and feedback provided in a timely manner. In addition, there should be an information flow with pertinent details to the person reporting.*

The organization does not have a well established process of providing feedback or highlighting, at the right level, the action taken to the person reporting. It is unclear who is responsible to perform these duties/tasks. This can result in a lack of closure to the reporter resulting in questioning the entire progam/process.

iii. Reporting Options*: There should be an easy access to the whistleblower channels for example, phone, email, application forms and these channels should be readily available.*

The whistleblower program at BCLC does not highlight or make easily accessible information on all modes of communication available to employees. Further, there are no direct links available with details to hotline.

From a reporter of an incident perspective, this makes the process a task requiring effort. Not the best set-up if we want employees to use the program appropriately for the long-term benefit of the organization.

iv. Independence*:There should be independence both from the point of view of who receives the hotline call and also who performs investigations.*

At BCLC the calls are set-up to be received by an independent third party. However, the resulting investigation are performed by management. Based on the nature of the report, appropriate management are informed of details for investigation. From a reporter perspective this may deter them from making the call.

Best practices and results of surveys performed on a global scale by ACFE indicate Audit Services should be central in receiving these call details from external third party managing the hotline. Subsequently, based on the details of the call, Audit Services can coordinate with appropriate experts within the organization.

> **Per ACFE, one of the key reasons for lack of reports to the whistleblower hotline are:**
> - **"Why bother" attitude of employees.**

B. Fraud Training

Based on the nature of the industry, volume of patrons and billions of dollars involved, BCLC, like any other organization in casino and lottery business, needs to be ever mindful of fraud risk. Fraud training should be one of the key items in the overall annual training program.

Currently there is the annual training on the SOEBC which is mandatory for all employees. However, other fraud related courses available to employees in the Learning Management System (LMS) and BCLC's learning ecosystem are limited.

> **Fraud is a human problem, not an accounting problem. Books and records do not commit fraud, people do.**

There are no articles available with information regarding fraud topics, or fraud scenarios on BCLC's intranet[s.15(1)]

IMPACT

In the fast-evolving ecosystem, fraud is one of the concerns in the corporate setup across industries. For management to cope with this risk appropriately, all sub-elements need to be existing and functioning at the optimum level.

If any element within is lacking or non-existing, it increases fraud risk and exposes the organization.

AGREED UPON ACTION PLANS

All aspects highlighted and shortcomings/deficiencies called out will be considered and appropriately changed to meet best practices and levels expected for an organization the size and in the line of business as BCLC. This should positively impact the corresponding fraud exposure the organization may face.

Audit Services will be involved for investigations as deemed appropriate.

RESPONSIBLE PERSON

Marie-Noelle Savoie, Chief Compliance Officer & V.P. Legal, Compliance, Security
Sandy Austin, Chief People Officer

**COMPLETION DATE
MARCH 31, 2025**

4. Review Fraud Related Elements and Address Gaps

Fraud is not a new risk in any organizational setup and there are various aspects impacting the fraud environment. Management must know, understand, and appropriately manage all these aspects to ensure fraud exposure is treated appropriately and ensure it does not spiral into a major issue.

OBSERVATIONS:

Key aspects management needs to be aware and manage appropriately are:

A. Transparency

Transparency both at the organizational level and during fraud investigations are important.

a. Organizational Transparency: Helps in identifying accountability, which is a tool for reducing fraud.
b. Investigation Transparency: Within the limitations, and to the extent possible, fraud reporter should be in the loop. This helps in forming a clear and unbiased opinion on the fraud management process.

Fraud allegations often are treated in different ways based on their perceived worth. Lack of transparency involving fraud amplifies the negativity surrounding it.

> **Only when fraud is appropriately discussed, can it be aptly addressed by management.**

> **Transparency increases credibility and accountability.**

B. Focus on Corporate Culture and its Assessment at Intervals

Like any organization BCLC also has an evolved corporate culture. However, on review a few gaps were noted in the process level, as detailed below:

i. It has not been reviewed and assessed periodically.
ii. Any gaps or shortcomings are currently unknown.
iii. Desired future state has not been called out.
iv. Understanding of the link between internal controls and corporate culture is not explicit.

A few points are further detailed in the section below:

a. <u>Importance of corporate culture</u>: Senior Leaders, Executives and Board have an important role specific to positive fraud culture. They need to set the tone at the top. The two pillars to build a positive work culture are i). Trust in leadership, and ii). Open communication.

b. <u>Link between corporate culture and internal control</u>: The reason why culture is so important from a fraud risk management perspective is, there is a direct link between corporate culture and internal controls. It is well established that strong internal controls are the first line of defence and plays an important role in fraud detection and prevention.

c. <u>Reassess corporate culture</u>: Corporate culture changes over time due to organizational dynamics, ecosystem changes, personnel and leadership shifts, business evolution, etc. Due to corporate culture importance, organizations should assess them periodically and work towards making changes, as required.
   i. Determine current state.
   ii. Find weakness / shortcomings.
   iii. Lay out desired path for the future.
   iv. Develop tangable steps to bloster positive and desired future culture.

C. Remove Negativity Attached to Fraud

a. <u>Increased negative correlation</u>: In an organizational set-up fraud is still an uncomfortable topic to discuss and is immediately related to numerious negative words – corruption, cheating, swindling, etc.

b. <u>Depersonalizing</u>: All fraud across organizations and contols have a human aspect. Depersonalizing fraud and its investigation process will remove/reduce the negative connotation.

c. <u>Share lessons learnt</u>: There is hesitancy from the divisions/departments in sharing lessons learnt from a fraud event, even within the senior leadership level. Instead of looking at this as an opportunity to share valuable information, it is viewed as failure by the impacted team.

For fraud to be managed and FRM program to mature and serve the organization well, these are the changes and improvements to focus on.

D. Responsibility and Accountability

Starting with the Board, executives and senior leadership, management and staff all are responsible for fraud management and have a key role to play.

However, there is no clear accountability assigned at executive/senior leadership level to oversee:

a. Corporate wide fraud risk management process.
b. Periodic reviews to improve framework.
c. Ensure controls are operating as expected.
d. Central reporting to executives and Board on fraud.

E. Definition

There are multiple definitions of fraud available, and the organization is yet to officially determine which is to be applied consistently across all elements of FRM program. For example:

a. Criminal Code Definition – Charge of fraud can be brought for any act of deceit, falsehood or other fraudelent means intended to deprive the public or a specific person of money, property, services or valuable security.
b. COSO Definition – Any intentional act or ommission designed to deceive others resulting in the victim suffering a loss and/or the perpetrator achieving a gain.

The prevalent and all-inclusive definition from an organizational perspective and FRM viewpoint is the COSO definition.

F. Policy

Currently FRM procedures are spread across 17 BCLC policies. Due to the lack of a central document capturing all facets of FRM, there could be lack of clarity on activities, roles, sequence of events, fraud vs. theft distinction, etc.

All these result in exposing organization's guard against fraud risk and the effective enactment/execution of the FRM program.

IMPACT

The different aspects highlighted are all integral parts of the organizational guard against fraud risk and aids in the effective implementation of the FRM program.

Deficiencies or shortcomings in these areas expose the organization in a negative way in its fight against fraud.

AGREED UPON ACTION PLANS

A – D: The highlighted exceptions will be evaluated, and necessary actions taken to address their shortcomings. This should enable the organization to build a strategic and comprehensive fraud program.

E – F: Currently, in the final stages of issuing the fraud policy document. The exceptions of definition and central policy will be looked into as necessary. This issue should be addressed once the draft policy is reviewed by required stakeholders and approved.

RESPONSIBLE PERSON

Marie-Noelle Savoie, Chief Compliance Officer & V.P. Legal, Compliance, Security
Sandy Austin, Chief People Officer

COMPLETION DATE
MARCH 31, 2025

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