



Compliance Management Software Solution

360factors

ABA Endorsed Solution Due Diligence Report

See the Seal. Trust the Solution.



Introduction

The American Bankers Association is committed to helping banks run strong and efficient organizations. This due diligence report provides an overview of the research we conducted, through our subsidiary the Corporation for American Banking, which led to the ABA endorsement of Predict360, a compliance management software solution offered by 360factors.

ABA's mission is to meet bankers' needs through product evaluations and vendor due diligence. Our process focuses on researching product solutions that have been identified by ABA member banks. We begin by soliciting feedback from bankers through committees, focus groups, surveys and our Banker Advisory Council. All of this helps us identify and prioritize our research in areas which provide significant benefits to our bankers. We then work closely with third-party industry specialists and ABA staff experts, conducting extensive research to determine the solutions which will earn the exclusive ABA endorsement.

Our research focuses on the following areas:

- Financial Analysis
- Management Strength and Ownership
- Long-Term Stability
- Solution Functionality
- Partnerships
- Pricing
- Liability
- Information Security
- Disaster Recovery
- Regulatory Requirements
- Compliance Functions
- Legal Opinions
- Customer Service
- Banker References
- Competitive Landscape

This report is designed as an industry analysis tool, providing you with valuable product and third-party provider information.

We hope you find it helpful as you conduct your own due diligence on compliance management software programs.

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Executive Summary

360factors Inc. provides risk and compliance management software solutions to financial institutions. Using artificial intelligence (AI) and natural language processing (NLP) technology to reduce the effort and time involved in managing risks, regulations and compliance, 360factors Inc. helps financial institutions respond to new regulations and manage regulatory and compliance requirements in a more effective and efficient manner.

360factors creates targeted solutions for small and mid-market banks and financial institutions. These solutions are intuitive and easy to use, with quicker deployment timelines that require less implementation effort. 360factors' solutions provide value to banks by helping reduce their efforts in managing compliance and avoiding the need to hire additional staff.

360factors has built a patented enterprise risk and compliance management platform based on AI. Predict360, the flagship software product, combines and manages:

- Regulations and change management
- Compliance activities and tasks
- Policies and procedures
- Risks and controls
- Audit, self-assessments, surveys and inspections
- Employee qualifications, certifications and training
- Performance and goal management
- Access to and collaboration with a community of experts and consultants

Predict360 operates on a single, integrated cloud-based SaaS platform powered by AI that augments a bank's existing compliance and risk staff to improve productivity, efficiency and effectiveness in an easy-to-use and cost-effective solution.

A comprehensive analysis of 360factors, its ability to provide seamless integration of its compliance management suite and their focus and pricing advantages for small, regional and large banks led ABA, through its subsidiary the Corporation of American Banking, to endorse the compliance management software, Predict360.

Solution

360factors' Predict360 Compliance Management Solution is a next-generation, cloud-based, highly-integrated solution for managing governance, risk and compliance across an organization. It is easy to use, quick to deploy and has a low total cost of ownership to help reduce the clients' efforts in managing their compliance and regulatory requirements.

Incorporating AI and NLP technology, Predict360 helps automate and reduce the effort involved in managing constantly-changing regulatory compliance requirements and avoiding the need to hire additional staff.

Predict360 helps banks and financial services firms meet all their governance, risk and compliance functions using a single, integrated platform. It increases efficiencies, reduces costs and improves quality for organizations managing regulatory changes, operational risks, compliance and policies and procedures. Predict360 enables functional managers and staff to manage their day-to-day risk and compliance activities while providing executives visibility into the risk and compliance profile of its businesses, locations and assets. Its unique differentiators include:

- **Artificial Intelligence** – Automates and reduces the ongoing effort in managing compliance activities and regulatory changes.
- **Affordable** – Low upfront and ongoing costs for banks and financial institutions of all sizes
- **Expert Connect:** An 'Expert Connect' network that provides access to a third-party expert community and which includes built-in software support for Q&A, responses, commentary, guidance and even conducting projects with those experts.
- **Consultant Managed Service:** Enables third-party consultant firms to help manage their clients' systems and provide more value from a bank or financial institution's existing relationship with their consultants.

360factors Inc. helps financial institutions **respond to new regulations and manage regulatory and compliance** requirements in a more effective and efficient manner.

Predict360, the ABA endorsed solution for compliance management, provides the following modules in a single, integrated software solution:



Regulatory Change Management

Predict360's Regulatory Change Management (RCM) module enables organizations to track changing regulatory requirements and update all compliance-related activities and documents accordingly. With its unique mapping abilities and patent-pending AI with NLP technology, Predict360 semi-automates the process of determining the impact changing regulation may have on financial institutions by automatically alerting appropriate users of regulatory changes or updates, visually identifying those changes and determining what may be impacted by those changes.

Predict360's Regulatory Change Management module includes a license to the complete federal and state-level Code of Federal Regulations (CFR) library along with all updates and changes via the built-in integration of regulatory data provided by CaseMaker™.

Compliance Management

Predict360's Compliance Management module enables organizations to collect, store, track and collaborate on all compliance-related activities and regulatory reporting requirements.

A customizable workflow engine supports unique workflow processes for different types of activities and incidents with easy-to-use data collection forms and automated alerts. Key Performance Indicators (KPI) dashboards and reporting are driven by assigned priority, impact, urgency, type and category, parties involved, and business unit/organizational area. Additionally, an integrated compliance calendar provides complete visibility to all compliance activity being performance and coming due.

Risk Management

Predict360's Risk Management module enables organizations to identify, quantify, monitor and minimize risks. It allows businesses to manage both operational risks, such as environmental, financial, legal, reputational and safety risks, at the business unit level as well as enterprise risks. Predict360's Risk Management enables organizations to better manage risks by tying risk mitigation activities back to the standards, regulations and business requirements that drive them.

Organizations can manage risks using proven operational (ORM) and enterprise risk management (ERM) techniques such as initial risk assessment, controls effectiveness, residual risk measurement and monitoring. Key functionality includes implementing risk assessments through audits, gap analysis, self-assessments and inspections. Based on the results, workflows and controls can be triggered to mitigate the risk, assign tasks and corrective actions, create new policies or procedures, or kick off training plans.

Audit Management

Predict360's Audit Management module enables organizations to manage their complete internal and external audit lifecycle.

Highly configurable, flexible data-gathering and aggregation framework enables organizations to set up all audit types, checklists and structures. Dynamic workflow can execute customer-specific processes as the result of an audit, survey, gap analysis or inspection. Flexible reporting and analytics enable enhanced visibility along with smarter and faster decision making. Audit questions can be mapped directly to the regulatory and standards requirements as well as the business objectives that drive them, which allows unprecedented coverage, extensive reporting and real-time response to changes in those requirements. Assessments can be assigned to auditors or directly to individuals responsible for the processes, and can be standardized using templates and checklists.

Document Management

Predict360's Document Management module gives organizations the ability to understand all aspects of the document lifecycle, which includes the creation, approval, access control, version control, change tracking, change notification and expiration of documents. Documents are saved in centralized storage allowing remote access across the organization. As part of the Predict 360 suite, documents such as policies and procedures can be mapped to appropriate regulations, standards, controls, risks, corporate goals, training classes, certification requirements and/or business objectives.

In particular, Predict360's Document Management module supports the lifecycle of **policies and procedures** including the creation, review, sign-off, approval, distribution and acknowledgement process. Those affected by the policy or procedures can easily access, read, acknowledge, agree to comply by the document electronically from any location in the world, and can even demonstrate competency via testing or assessment. Furthermore, the system can automate the required periodic review, update, re-distribution and re-approval of the policies and procedures documentation.

In addition, Predict360 Document Management can also provide e-signature capability through its optional integration with DocuSign. With DocuSign, users can send, sign and manage legally-enforceable documents electronically and securely around the world in the cloud and without any paper.

Learning Management

Predict360's Learning Management System (LMS) module is the most unique regulatory compliance-centric learning management system in the industry. Training can be linked to the associated regulatory change, risk, audit, incident, case, policy, procedure and/or qualification (competency) requirement.

Predict360 gives you the ability to create and manage training plans for various workforce groups or individuals. Training plans can be created at the corporate, site and group level while tracking and managing online classroom and web-based training. It allows you to incorporate your current training material into the platform and launch and train your employees, and there is also optional access to over 6200+ role specific courses in EHS, Career, Ethics and Compliance, IT Certification and Software Skills.

Predict360's Learning Management System (LMS) module is the **most unique regulatory compliance-centric system** in the industry.

Qualification Management

The Predict360 Qualification Management module monitors, aggregates, and maintains employee certifications, qualifications and/or competence tracking. It enables organizations to streamline the qualification process and ensure that employee qualifications remain current. It can track and maintain employee qualifications, monitor qualification expirations, and maintain the qualification history of employees and subcontractors. When a qualification is linked to a training course, the course is automatically assigned to the employee or subcontractor and when the employee or subcontractor completes the course, the qualification is renewed beginning the cycle over again.

By ensuring completion and renewal of qualifications in a timely and centralized fashion, organizations can avoid compliance penalties and costly employee downtime by ensuring that employees remain certified and eligible for work.

Performance Management

Predict360's Performance Management module aligns individual goals to organizational goals and streamlines the performance management process to promote goal achievement, productivity, continuous feedback, coaching and development to improve overall business performance.

Highly configurable dashboards make goal-setting easy and transparent, giving managers and their employees a real-time snapshot of their performance and progress towards achieving their goals.

Anonymous Hotline Reporting

Predict360's Anonymous Hotline module provides prompt and valuable insight into potential risks and dangers from violations of policies, procedures and controls resulting in noncompliance and cutting into company margin.

This module provides a single centralized data repository and facilitates collection of incident data, assess risk, follow up recommended actions, tracking of process ownership, risk assessment, risk analysis and remediation plan. A portal is provided which allows employees, customers and external parties to submit incidents electronically and anonymously, while providing those parties with a unique tracking number so that they can track the follow up to their concerns while remaining anonymous. And advanced analytical reporting and dashboard capabilities provides micro and macro level visibility into risk exposure enabling qualitative and quantitative trending metrics of potential risks to empower decision making.

Third-Party and Vendor Risk Management

Predict360's Third-Party Risk Management module helps your organization manage risk and minimize risk exposure from vendors, suppliers and consultants by ensuring their compliance with applicable laws, regulations and standards, and internal policies and requirements by driving operational excellence.

Predict360's Third-Party Risk Management Software module provides a centralized data repository that collects information and documents about third-parties using industry-standard and configurable checklists from onboarding to periodic performance evaluations. Automated workflow processes collect information from internal employees as well as external third-party contacts, drives review and approval of this information, enables categorization of the type and level of risk for each entity, and then automates ongoing controls and assessments to periodically measure and manage their performance and compliance. With advanced reporting and dashboard capabilities providing visibility into the risk and status of every organization providing a product for, performing a service for, or performing work on behalf of your organization, you can effectively manage compliance and risk exposure.

Cyber Security Management

Predict360's Cyber Security Management module helps organizations identify, prioritize and manage IT and cyber security threats. With support for ISO, NIST and other cyber security standards, organizations can incorporate industry best practices to manage the risks to their IT environments from cyber security threats. By cataloging operational cyber security risks and threats, organizations can determine the risks from those threats, prioritize their responses, and implement ongoing controls to ensure that organizations constantly manage their threats from cyber security, while also providing confidence to their executives and board that their cyber security policies and procedures are effective at meeting their organizations stated risk profile level and compliance to relevant regulatory requirements.

This module incorporates support for industry-standard requirements including ISO and NIST to capture and measure risks, manage tasks and activities to mitigate those risks, implements ongoing controls and assessments to manage those risks, and the ability to track and manage security incidents. Advanced reporting and dashboard capabilities provide visibility and monitoring capabilities to IT, risk and compliance officers, as well as executives and the board of directors.

Expert Connect

Predict360's Expert Connect provides access to a wide range of consulting experts who are former and existing compliance managers, regulators, system operators and consultants across a variety of industries. Questions can be posted directly within the Predict360 software. Responses to these posts and other commentary can be recorded and tied to associated regulatory, standard policy, procedure or risk.

Technology

Predict360 is a web-based application built on JEE platform and hosted in Microsoft's Azure data center based in the US. Microsoft Azure data centers are SOC 2 Type 1, 2 and 3 certified.

Banks need a web browser and access to the Internet to implement and use the Predict360 Compliance Management Solution. There is no software to install on the bank's computers or servers.

Implementation

Unlike other fully-integrated compliance management solutions in the marketplace, the Predict360 system can be setup and running for a new bank in days; the initial implementation setup fee is provided at a low fixed-cost and includes assistance with defining the users and their roles, configuring and setting up the relevant modules and providing personalized web-based training.

Importing and setting up a customer's existing data (such as current policies & procedure documents, existing audit checklists and templates, known risks and risk mitigation strategies and controls, etc.) may take an additional 1-3 weeks, but is dependent on the size of the bank and amount of data to be migrated into the new solutions. Banks have the option of loading this data into the system independently to minimize costs, or 360factors can provide resources to help migrate and load this data and configure the system to the customer's specific business processes. If a bank has specific custom workflow and/or unique reporting requirements, that may require additional cost and time as well.

Training and Customer Support

The 360factors customer service and support team is committed to helping its customers and partners successfully benefit from the use of Predict360. 360factors provides both a call center and e-mail support, with standard support hours from 7:00 AM to 5:00 PM Central Standard Time Monday – Friday (excluding company holidays). During these hours, 360factors team can be reached by calling their dedicated support line at (512) 904-3191, toll-free company line at (866) 385-2341 or by emailing to support@360factors.com. Customer support and all maintenance and upgrades are provided as part of the annual subscription fee and do not require any additional costs.

360factors offers multiple training options for its banking clients including live web-based and onsite training options along with recorded video tutorial accessible 24x7. The initial implementation and deployment support package includes personalized web-based training to ensure customers are fully able to use the system to receive maximum benefit and value as quickly as possible. Access to all the recorded video training sessions are provided at no additional cost to users.

360factors conducts periodic surveys to better understand their customers' needs and to help drive their product roadmap and enhancements, and 360factors also conduct surveys based on industry-standard NPS metrics (Net Promoter Score) in order to monitor their metrics and performance on customer responsiveness and satisfaction around support.

ABA Member Benefit

ABA Members receive exclusive pricing on both the annual subscription fee and on the upfront implementation services. This pricing includes discounts that exceed what non-ABA member banks pay.

In addition, ABA has also negotiated licensing terms that provides fixed pricing to ABA members based on the assets under management by a bank and includes unlimited users of the 360factors software to provide full value and usage to member banks without limitations.

Risk Management

Information Security/Disaster Recovery

From the core application design, to the choice of application hosting, to the processes implemented, 360factors is dedicated to the absolute security of your data.

360factors incorporates into its services the following security features and philosophies:

- **PII Data** - PII information stored on Predict360 servers is minimal. First and last name, email address and phone number, of which the first three are required and the last one is not. 360factors has implemented and follows a standardized Information Security and Privacy Policy.
- **Channel** - The solution utilizes SSL 256bit encryption to secure the channel between the customer and the Predict360 data centers. Additionally, access to the customer's portal can be restricted by IP address range.
- **Perimeter** - Web vulnerability scans are performed annually. Network penetration testing is performed every six months. An IPS (Intrusion Detection System) is utilized for the production server environments.
- **Environment** - Both the primary data center (Azure South Central) and Disaster Recovery (DR) data center (Azure North Central) are SOC 1, 2 and 3 certified. 360factors employs a defense in depth strategy in its production environments. Our load balanced web farm is located within its own distinct network (the DMZ) and is the only externally facing network in this environment. All database servers and application processing servers are located on another separate network, separated by yet another firewall and all traffic between the DMZ is restricted to specific ports and monitored 24/7. All traffic into the DMZ flows through firewalls that scan all HTTP and HTTPS traffic. Each firewall utilizes both IPS (Intrusion Prevention) and IDS (Intrusion Detection). The infrastructure is built around a "highly-available" architecture with no single point of failure.

Predict360 utilizes a primary and a secondary data center for disaster recovery purposes. The two facilities are configured identically to provide a fully redundant processing solution for business continuity. 360factors maintains a Disaster Recover and business resumption plan that is tested bi-annually to ensure fully operational failover capabilities should the need arise. All customer data is stored on Geo-redundant storage (GRS). GRS replicates customer data to a secondary data center in a different region ensuring customer data is durable even in the case of a complete regional outage or a disaster in which the primary region is not recoverable. All backups are stored on GRS and are also replicated offsite.

- **Application** - Security patches are evaluated and implemented on a regular schedule. All customer application data on disk is encrypted using individual customer specific encryption keys.
- **Process** - Within 360factors' network, user access and role recertification for all systems (platform, server and application) are conducted every six months. User accounts for users that have left the company or that have been terminated are removed immediately, typically before they have left the facility. Access to the data center by staff is limited to operating over a secured point-to-point (FW to FW) tunnel between our offices and the secure data center. Remote access and/or direct VPN access to the environment is not allowed.

360factors does not utilize subcontractors for either infrastructure or software development. 360factors has a documented process and SLA's regarding security breaches. After discovery & immediate root cause analysis & scope determination, affect parties are notified immediately (<24 hours).

Regulatory Compliance

360factors' Regulatory Change Management module enables organizations to track changing regulatory requirements and update all compliance-related activities and documents accordingly. With its unique mapping abilities based on artificial technical technology, Predict360 semi-automates the process of managing regulatory changes by helping bank's regulatory and compliance professionals:

- Determine who the change should be routed to for review
- Analyze each change and what has changed
- Determine the impact on their organization
- Assign, track and coordinate the required activities within their organization to manage those changes
- Manage the risks associated with those regulations and then constantly ensure that their organization remains in compliance through internal audits and compliance-related controls and activities.

Predict360 RCM module provides the following key features to financial institutions:

- Ability to seamlessly upload, manage and access banking regulations, including both federal and state-level CFR regulations

- Ability to import digital regulatory content for other banking regulatory jurisdictions
- Ability to import other digital content such as standards, policies, procedures, etc.
- Ability to analyze digital content using cognitive computing technology to identify compliance requirements and their context
- Ability to manually enter regulations and standards and identify applicable compliance requirements
- Ability to create categories of regulations and requirements
- Ability to establish a library of digital content accessible to business units, sites and asset for determination of applicability
- Ability to automatically compare older versions of regulatory and other content with the latest changes to compare the differences and enable updates to applicable tasks, documents, risks, inspections, surveys, etc.
- Ability to notify and alerts to individual or groups of changes to regulations
- Ability to associate regulations and requirements with one or many business units, sites, asset types, assets and/or personnel/subject matter experts
- Ability to associate requirements with compliance action and workflows, learning management and training plans, risks, risk surveys and inspections, documents
- Ability to view regulatory information and requirements in configurable reports and dashboards.

360factors also includes a license to the complete federal and state-level CFR library along with all updates. These regulations can be mapped to policies & procedures, documents in other systems, compliance-related tasks and activities, audit checklists, assessments and controls and risks.

Compliance Management

Predict360 automates the enterprise risk and compliance management process for financial institutions and helps them achieve optimal visibility into all risk and compliance aspects of the organization. It leverages unique mapping and cognitive computing technologies to provide regulatory insight, predict risks and drive operational excellence. Predict360 provides the following key features to financial institutions:

- Ability to create and track compliance activities across multiple business units and sites
- Ability to create and associate compliance activities with regulatory requirements, risk surveys and inspections, documents, etc.
- Ability to launch and follow workflows for different types of compliance activities such as Case, CAPA, Incident, Task and Event. Additional custom workflow and data collection fields can easily be configured.
- Ability to show compliance activities on a calendar with month, week or day views
- Ability to receive via email, reminders and escalations associated with compliance activities
- Ability to launch investigation, Root Cause Analysis and CAPA workflows from within other compliance workflows
- Ability to conduct advanced searches on compliance activities
- Ability to view compliance activities in configurable reports and dashboards
- Ability to configure compliance routines workflows
- Ability to create escalations and approvals

Company Overview

360factors is an enterprise risk and compliance management technology and services company that helps organizations improve business performance by reducing risk and ensuring compliance. Its cloud-based risk and compliance platform, Predict360, uses unique mapping and cognitive computing (artificial intelligence) technologies to provide regulatory insight, predict risks and drive operational excellence. Predict360 vertically integrates regulations and requirements, policies and procedures, risks and controls, audit and inspections, performance management and qualifications, certifications & training in a single platform. It enables functional managers and staff to manage their day-to-day risk and compliance activities while providing executives visibility into the risk and compliance profile of all its businesses, locations and assets.

Predict360's key differentiator is that it is an integrated governance, risk and compliance (GRC) platform built on artificial intelligence, automating several functions while improving quality and value through a single platform. It creates risk relationships between those functions and provide visibility of where risk intersect, providing stakeholders a deeper, wider and holistic view of risk and compliance.

360factors has provided regulatory training and compliance solutions and services to many small and mid-market banks across the United States, and this experience and expertise has provided valuable insight into how Predict360 was developed as a next-generation risk and compliance management solution that is easier to use, quicker to deploy, has a lower total cost of ownership and reduces their client's efforts in managing risk, compliance and regulatory requirements.

Financial Viability/Audit

Backed, owned and funded on a single majority investor, 360factors is a private company that has managed its financials to maintain independence from outside investors. As a result, 360factors has been able to chart their own path and remain focused on providing an industry-leading integrated GRC solution that can be deployed to mid-sized organizations in a more efficient and streamlined process. 360factors is experiencing significant growth in customers, especially mid-sized and community banks.

As a private company, 360factors doesn't publish its financials. However, 360factors will provide financial information to prospective customers under an NDA and/or by request, will set up a call between the CFO and a bank's financial team to present and discuss their financial stability.

Corporate Management Strength

The company's executive team includes Chief Executive Officer, Carl McCauley; Chief Operating Officer, Chris Duden; Chief Financial Officer, Michael Mariano and Executive Chairman, Ed Sattar. Following are the corporate bios of the 360factors senior management team.

Executive Staff

Ed Sattar, Executive Chairman and Company Founder

For more than a decade and spanning across multiple industries, Ed has made significant professional contributions to the regulatory compliance space. His experiences include extensive research and consulting to regulatory education and training providers as well as state and federal regulatory agencies. During his tenure in the regulatory compliance space, he identified key criteria and regulatory standards and regulatory change management frameworks that are currently being published and implemented.

Ed Sattar was nominated for the Ernst & Young Entrepreneur of the Year award three times and was among the top seven finalists in 2009. As a result of his leadership, 360training.com has appeared on the Deloitte Fast 50 as the 6th fastest growing company in Texas and has been listed in Inc. 5000 several times as one of the fastest growing companies. Ed has founded and serves as a strategic advisor and executive chairman to a number of companies, including 360factors.com.

Ed studied Electrical Engineering and Finance at the University of Texas in Austin.

Carl McCauley, Chief Executive Officer

Carl brings over 25 years of technology, sales and management experience to 360factors and is responsible for leading 360factors business and product strategy, sales growth and market expansion.

Carl joined 360factors from Zycus, an industry-leader in procurement source-to-pay solutions, where he led the sales & solution consulting team as Senior Vice President of Sales and helped them become a leader in Gartner's Strategic Sourcing Magic Quadrant. Prior to that, Carl led the sales and marketing team at AFS Technologies, a leading provider of supply chain software solutions for the food & beverage industry, where during his tenure, he helped grow revenue from \$40M to over \$90M.

Carl also served as VP of Sales at MetricStream, growing them from startup phase to industry leader in risk and compliance. During his seven-year tenure, sales grew at an average rate of 50% annually and MetricStream became recognized as a Leader in Gartner's GRC Magic Quadrant.

Carl has also worked as Chief Operating Officer at Visiprise, Vice President of Software Operations at Teradyne, President and CEO of BrightPost Solutions, Senior Vice President of Product Management and Software Development at Fischer International, and the Vice President of Software Applications at Ingenico (formerly Checkmate Electronics).

Carl holds a Bachelor of Science degree in Electrical Engineering from the Georgia Institute of Technology.

Chris Duden, Chief Operating Officer

Chris brings decades of technical and product management experience to 360factors. Previously, Chris was the COO of Citation Technologies, Inc., a leading provider of cloud-based, global SaaS and EHS solutions when it sold its flagship product CyberRegs to IHS.

Additionally, Chris was the CTO and then President of Net Fusion Services. Net Fusion Services provides software development services, managed services, data center solutions and network operation center services with a specialization in business continuity, disaster recovery and private-to-cloud migration solutions for fortune 1000 companies. Chris first built the software delivery organization from the ground up, growing the company from a single customer and three employees into a key regional Microsoft Gold Certified partner with over fifty customers and thirty-five employees. He then later oversaw the merger and integration of a local network services company, adding managed services as an additional line of business. Chris also serves on the Board of Directors for Big Lake Software, a professional services company specializing in Embedded Linux.

Prior roles include development architecture at Infolmage, an enterprise portal software company, and at Baker & McKenzie, the world's largest corporate law firm, and development roles with multiple companies including GE.

Michael Mariano, Chief Financial Officer

As CFO of 360factors.com, Michael is responsible for leading 360factors' mergers and acquisitions, finance, accounting and reporting, strategic planning and analysis and tax and auditing practices. Michael brings more than twenty years of progressive financial, revenue, accounting and operational management experience in the regulatory compliance, manufacturing, hardware and software industries.

Prior to 360factors/360training.com, Michael was a virtual CFO with VCFO Inc., and has held numerous executive management positions for CreditMinders, Inc., G2 Financial, Pavilion Technologies, S2 Systems and Stratus Computer, where he helped lead the company from a private R&D corporation to a \$500M organization, including a \$300M initial public offering. Michael earned his BSBA in Accounting and Finance from Northeastern University in Boston, Massachusetts.

Mary Evans, Chief People Officer

Mary Lanier-Evans is the People & Culture Officer for 360factors. Mary has over 17 years of human resources leadership experience in the fields of healthcare, manufacturing, retail and real estate. Her areas of expertise are in employee engagement, benefits analysis, culture, compensation and HRIS.

Mary obtained her Bachelor's degree from Western Governors University. She also holds a Professional in Human Resources (PHR) certification, a SHRM-CP (Certified Professional certification and a CompTia Project+ certification.

About the American Bankers Association

ABA is the voice of the nation's \$17 trillion banking industry, which is composed of small, regional and large banks that together employ more than 2 million people, safeguard \$13 trillion in deposits and extend more than \$9 trillion in loans.

About ABA Endorsed Solutions

In a rapidly changing landscape, banks turn to the proven expertise of ABA Endorsed Solutions for the most advanced technologies and products to grow their business, cut costs and transform the customer experience. From compliance and insurance to payments and mortgage lending, you'll find products and services that can enhance your bank's bottom line.

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