Example National Bank (fictional)

Automated Decision-Making Authorization Memorandum

EXAMPLE-BANK-CREDIT-MEMO · sha256:6d839dda670…

Record review only. Evidence requirements describe what must be collected, not observed results. Operational effectiveness is not assessed by this memorandum. Institutional authorization is not a legal compliance determination.

Version
: 1

Institutional Authorization
: Under Review

Issued
: 2026-11-24

Expires
: 2027-11-24

Authorized System
: Commercial credit memo drafting agent — example-bank-credit-memo v1

Approval Rule
: all_of_concurrences_plus_risk_acceptance

Authorized Scope

System Type
: credit_decision_assistant

Tools
: list_loan_parts, read_loan_part, credit_decision_draft

Data Domains
: commercial_loan_file (read); borrower_financials (read); credit_bureau_data (read)

Environments
: prod-us

Counterparties
: —

Explicitly Excluded
: government_monitoring_information, privileged_legal_memo, unrelated_borrower_document, unverified_adverse_media, final_credit_decision

Drawn from the supplied authorization boundary. Where the signed record carries a boundary digest, compare it with the proposal's canonical digest before relying on these facts. Declared scope does not establish actual deployment.

Risk Tier

A classification of how much control this use case owes, as signed into the record under the tiering policy named below. It is not an authorization, a verification result or a verdict on any action, and it does not say the use case is acceptable.

Critical

Tier
: tier_1

Binding Factors
: consequence (taken as highest_consequence; consequence policy 1: no operation for tool(s) list_loan_parts, read_loan_part); reversibility (taken as irreversible; consequence policy 1: no operation for tool(s) list_loan_parts, read_loan_part); autonomy (human_on_the_loop; tool(s) list_loan_parts, read_loan_part)

Factors Not Established
: consequence (taken as highest_consequence; consequence policy 1: no operation for tool(s) list_loan_parts, read_loan_part); data_sensitivity (taken as regulated_personal; data class(es) borrower_financials, commercial_loan_file not in the tiering policy); reversibility (taken as irreversible; consequence policy 1: no operation for tool(s) list_loan_parts, read_loan_part)

Stated Tier Floor
: none stated

Tiering Policy Digest
: sha256:66b37ea9cd56f32a2294fcf2d4ed58de3eebdb9324bbd26e45cdc2bd3aa7d8

Consequence Policy Digest
: sha256:b18d856bf1e54e9b5222a8e7388aba7e752c033f93124beb42737ad6339f1f

Not established by the record, so taken at the most severe level.
Establishing a factor can lower the tier; leaving it unknown cannot.

System and Dependencies

Model Dependencies (2)

Provider	Model	Version	Pinned
vendor-b	memo-model	2026-09	yes
agent-owner	credit-memo-instructions	memo-instructions-v4	yes

Evidence Inventory (2)

Kind	Title	SHA-256
system_brief	System brief	sha256:aa915d2b3fe5306173df57f5d5cb776b651e71faa3
evaluation_report		sha256:f2109608666fb5e813401b4836e89d86ec814024f2

Kind	Title	SHA-256
	Evaluation report: memo-model 2026-09 against prior manual memos	

Read from the authorization boundary the record names. Each digest identifies the material that was supplied; it does not establish that a provider's declarations in that material are true, and the provider's evaluation is the provider's.

Risk Acceptance

No official has accepted the residual risk of operating this system. This authorization is not in force.

These conditions specify the institution's requirements for operation. Whether they reduce risk depends on implementation and evidence not assessed here. Risk acceptance records an institutional decision; it does not waive mandatory obligations.

Designated Role
: Risk acceptance authority

Accepted By
: —

Designation Basis
: BNK-GS-4 section 3 (fictional). Residual risk on a system that drafts decisions or messages for customers is accepted by compliance or risk, because the harm lands on a customer and consumer-compliance exposure is the bank's. The Head of Retail Lending concurs and accepts none.

Concurrences on File
: 6

Conditions (28)

inventory.invokers_declared — scope

This system's record must state who or what may invoke it: the person roles, systems and business processes permitted to call it.

Authority
: OCC Supervisory Framework on Bank Use of Super Intelligence (Nov. 2026) (US)

Interpretation

Priya Raman, 2026-11-09 Demonstration content — a named synthetic reviewer's reading, not a real compliance opinion.

Policy
: BNK-POL-101 v1

Declared Control
: Example National Bank SI Control Set (fictional) / SIC-101 (The invocation allowlist is read from the signed record; a caller not on it is refused at the agent gateway.)

Evidence Required
: Record, for every invocation, the invoker and whether it is on the declared list.

On Violation
: block_action + escalate(Chief Risk Officer)

Approving Authority
: Priya Raman (Chief Risk Officer)

Revalidation Watch
: —

6/7 record links present

inventory.monitoring_declared — control

This system's record must state what is monitored, the role that owns the monitoring, how often it is reviewed, and who an exception escalates to.

Authority
: OCC Supervisory Framework on Bank Use of Super Intelligence (Nov. 2026) (US)

Interpretation
: Priya Raman, 2026-11-09 Demonstration content — a named synthetic reviewer's reading, not a real compliance opinion.

Policy
: BNK-POL-102 v1

Declared Control
: Example National Bank SI Control Set (fictional) / SIC-102 (Each inventory entry names a metric, an owning role, a cadence and an escalation target before the system is released.)

Evidence Required
: Record each monitoring review with the metric, the owner, the date and any escalation made.

On Violation
: escalate(Chief Risk Officer)

Approving Authority
: Priya Raman (Chief Risk Officer)

Revalidation Watch
: —

6/7 record links present

inventory.fail_over_declared — control

This system's record must state its fail-over arrangement: trained personnel, a fallback agent or an alternate process, and when it was last tested.

Authority
: OCC Supervisory Framework on Bank Use of Super Intelligence (Nov. 2026) (US)

Interpretation
: Priya Raman, 2026-11-09 Demonstration content — a named synthetic reviewer's reading, not a real compliance opinion.

Policy
: BNK-POL-103 v1

Declared Control
: Example National Bank SI Control Set (fictional) / SIC-103 (A fail-over reference and a last-tested date are required fields of the system's inventory entry.)

Evidence Required
: Record every fail-over test with its date and outcome.

On Violation
: escalate(Chief Risk Officer)

Approving Authority
: Priya Raman (Chief Risk Officer)

Revalidation Watch
: —

6/7 record links present

oversight.reviewer_competency_declared — control

Where a person reviews this system's output or action, the record must state the reviewer role and the basis for that role's competency, and the reviewer must have authority to reject, modify, pause or halt it.

Authority
: OCC Supervisory Framework on Bank Use of Super Intelligence (Nov. 2026) (US)

Interpretation
: Daniel Okafor, 2026-11-09 Demonstration content — a named synthetic reviewer's reading, not a real compliance opinion.

Policy
: BNK-POL-111 v1

Declared Control
: Example National Bank SI Control Set (fictional) / SIC-111 (Reviewer assignment is restricted to a role with a documented competency basis and halt authority.)

Evidence Required
: Record, for every review, the reviewer role and whether the reviewer rejected, modified or approved.

On Violation
: escalate(Chief Compliance Officer)

Approving Authority

Daniel Okafor (Chief Compliance Officer)

Revalidation Watch

trig-regulation-amendment, trig-periodic

7/7 record links present

oversight.span_of_control_bounded — control

The number of items one reviewer is assigned per day for this system must be stated in the record and must not be exceeded.

Authority

OCC Supervisory Framework on Bank Use of Super Intelligence (Nov. 2026) (US)

Interpretation

Daniel Okafor, 2026-11-09 Demonstration content — a named synthetic reviewer's reading, not a real compliance opinion.

Policy

BNK-POL-112 v1

Declared Control

Example National Bank SI Control Set (fictional) / SIC-112 (The work queue caps items per reviewer per day at the declared limit.)

Evidence Required

Record daily review volume per reviewer against the declared limit.

On Violation

escalate(Chief Compliance Officer)

Approving Authority

Daniel Okafor (Chief Compliance Officer)

Revalidation Watch

trig-regulation-amendment, trig-periodic

7/7 record links present

oversight.override_logged — evidence

Every override of this system's output or action must be logged with its reason, and override patterns must be reviewed.

Authority

OCC Supervisory Framework on Bank Use of Super Intelligence (Nov. 2026) (US)

Interpretation

Daniel Okafor, 2026-11-09 Demonstration content — a named synthetic reviewer's reading, not a real compliance opinion.

Policy

BNK-POL-113 v1

Declared Control

Example National Bank SI Control Set (fictional) / SIC-113 (The review tool refuses an override with no reason code and writes it to the append-only override log.)

Evidence Required

Record every override with the actor, the reason and the original output.

On Violation
escalate(Chief Compliance Officer)

Approving Authority
Daniel Okafor (Chief Compliance Officer)

Revalidation Watch
trig-regulation-amendment, trig-periodic

7/7 record links present

oversight.reviewer_independent — control

The reviewer of this system must be a role separate from the team that developed or owns it.

Authority
OCC Supervisory Framework on Bank Use of Super Intelligence (Nov. 2026) (US)

Interpretation
Daniel Okafor, 2026-11-09 Demonstration content — a named synthetic reviewer's reading, not a real compliance opinion.

Policy
BNK-POL-114 v1

Declared Control
Example National Bank SI Control Set (fictional) / SIC-114 (Reviewer assignment rejects a person in the owning or developing team's reporting line.)

Evidence Required
Record the reviewer and the owning team for every review.

On Violation
block_action + escalate(Chief Compliance Officer)

Approving Authority
Daniel Okafor (Chief Compliance Officer)

Revalidation Watch
trig-regulation-amendment, trig-periodic

7/7 record links present

mrm.independent_validation — approval

This system must be validated by a function independent of its developers and owners before use, and after a material change.

Authority
OCC Supervisory Framework on Bank Use of Super Intelligence (Nov. 2026) (US)

Interpretation
Samuel Adeyemi, 2026-11-09 Demonstration content — a named synthetic reviewer's reading, not a real compliance opinion.

Policy
BNK-POL-121 v1

Declared Control
: Example National Bank SI Control Set (fictional) / SIC-121 (Release is gated on a validation sign-off from the Model Risk Management function.)

Evidence Required
: Record each validation with its date, scope and the validating function.

On Violation
: block_action + escalate(Head of Model Risk Management)

Approving Authority
: Samuel Adeyemi (Head of Model Risk Management)

Revalidation Watch
: trig-regulation-amendment, trig-model-version, trig-eval-regression, trig-periodic

7/7 record links present

mrm.repeated_run_consistency — evidence

Evidence of this system's behaviour must come from repeated runs over a defined sample against a consistency threshold, not from a single successful run.

Authority
: OCC Supervisory Framework on Bank Use of Super Intelligence (Nov. 2026) (US)

Interpretation
: Samuel Adeyemi, 2026-11-09 Demonstration content — a named synthetic reviewer's reading, not a real compliance opinion.

Policy
: BNK-POL-122 v1

Declared Control
: Example National Bank SI Control Set (fictional) / SIC-122 (Validation evidence is accepted only as a run-count, a sample definition and a consistency measure.)

Evidence Required
: Record the sample, the number of repeated runs and the consistency measure for each validation.

On Violation
: escalate(Head of Model Risk Management)

Approving Authority
: Samuel Adeyemi (Head of Model Risk Management)

Revalidation Watch
: trig-regulation-amendment, trig-model-version, trig-eval-regression, trig-periodic

7/7 record links present

mrm.revalidation_on_vendor_change — control

When a vendor changes a model this system depends on, or a prompt or configuration changes, the system must be re-validated before it continues in use.

Authority
: OCC Supervisory Framework on Bank Use of Super Intelligence (Nov. 2026) (US)

Interpretation
: Samuel Adeyemi, 2026-11-09 Demonstration content — a named synthetic reviewer's reading, not a real compliance opinion.

Policy
: BNK-POL-123 v1

Declared Control
: Example National Bank SI Control Set (fictional) / SIC-123 (A vendor version change opens a revalidation task and holds the release until it is closed.)

Evidence Required
: Record each model, prompt or configuration change and the revalidation that followed it.

On Violation
: suspend_capability + escalate(Head of Model Risk Management)

Approving Authority
: Samuel Adeyemi (Head of Model Risk Management)

Revalidation Watch
: trig-regulation-amendment, trig-model-version, trig-eval-regression, trig-periodic

7/7 record links present

mrm.explainability_method_fit — evidence

The explainability method used for this system must be recorded with a statement of why it is appropriate for the use case, and its explanations must not be presented as a verified source.

Authority
: OCC Supervisory Framework on Bank Use of Super Intelligence (Nov. 2026) (US)

Interpretation
: Samuel Adeyemi, 2026-11-09 Demonstration content — a named synthetic reviewer's reading, not a real compliance opinion.

Policy
: BNK-POL-124 v1

Declared Control
: Example National Bank SI Control Set (fictional) / SIC-124 (An explanation is stored with its method and the use-case fit statement.)

Evidence Required
: Record the explainability method and the fit statement for the system.

On Violation
: escalate(Head of Model Risk Management)

Approving Authority
: Samuel Adeyemi (Head of Model Risk Management)

Revalidation Watch
: trig-regulation-amendment, trig-model-version, trig-eval-regression, trig-periodic

7/7 record links present

data_governance.lineage_recorded — data

The origin, licensing and limitations of the data this system trains on, is tuned on, retrieves or produces must be recorded, including data embedded in a third-party foundation model.

Authority
: OCC Supervisory Framework on Bank Use of Super Intelligence (Nov. 2026) (US)

Interpretation
: Helena Voss, 2026-11-09 Demonstration content — a named synthetic reviewer's reading, not a real compliance opinion.

Policy
: BNK-POL-131 v1

Declared Control
: Example National Bank SI Control Set (fictional) / SIC-131 (The data catalogue holds a lineage entry for every source and for each foundation model used.)

Evidence Required
: Record each data source with its origin, licence and known limitations.

On Violation
: escalate(Chief Data Officer)

Approving Authority
: Helena Voss (Chief Data Officer)

Revalidation Watch
: trig-regulation-amendment, trig-data-reclassification, trig-periodic

7/7 record links present

data_governance.synthetic_data_reviewed — data

Synthetic data used with this system must be reviewed for quality, representativeness and bias before use.

Authority
: OCC Supervisory Framework on Bank Use of Super Intelligence (Nov. 2026) (US)

Interpretation
: Helena Voss, 2026-11-09 Demonstration content — a named synthetic reviewer's reading, not a real compliance opinion.

Policy
: BNK-POL-132 v1

Declared Control
: Example National Bank SI Control Set (fictional) / SIC-132 (A synthetic dataset cannot be attached to a system until its review is recorded.)

Evidence Required
: Record each synthetic dataset and its review.

On Violation
: block_action + escalate(Chief Data Officer)

Approving Authority

Helena Voss (Chief Data Officer)

Revalidation Watch

trig-regulation-amendment, trig-data-reclassification, trig-periodic

7/7 record links present

data_governance.permitted_sources_enforced — scope

This system may read only the data sources and classes declared in its record, enforced by a technical control.

Authority

OCC Supervisory Framework on Bank Use of Super Intelligence (Nov. 2026) (US)

Interpretation

Helena Voss, 2026-11-09 Demonstration content — a named synthetic reviewer's reading, not a real compliance opinion.

Policy

BNK-POL-133 v1

Declared Control

Example National Bank SI Control Set (fictional) / SIC-133 (Data access is mediated by an allowlist generated from the record; any other source is refused.)

Evidence Required

Record every data access attempt with its source and whether it was permitted.

On Violation

block_action + escalate(Chief Data Officer)

Approving Authority

Helena Voss (Chief Data Officer)

Revalidation Watch

trig-regulation-amendment, trig-new-tool-grant, trig-periodic

7/7 record links present

privacy.prompt_output_retention_bounded — data

Prompts, outputs, embeddings and logs of this system must carry an access control and a stated retention period.

Authority

OCC Supervisory Framework on Bank Use of Super Intelligence (Nov. 2026) (US)

Interpretation

Rafael Duarte, 2026-11-09 Demonstration content — a named synthetic reviewer's reading, not a real compliance opinion.

Policy

BNK-POL-141 v1

Declared Control

Example National Bank SI Control Set (fictional) / SIC-141 (Prompt and output stores apply a retention schedule and role-based access from the record.)

Evidence Required
: Record the retention period and access roles for each store.

On Violation
: escalate(Chief Privacy Officer)

Approving Authority
: Rafael Duarte (Chief Privacy Officer)

Revalidation Watch
: trig-regulation-amendment, trig-data-reclassification, trig-periodic

7/7 record links present

privacy.vendor_training_use_restricted — prohibition

A vendor of this system may not use the bank's data to train or improve models offered to other customers unless the record states that it may.

Authority
: OCC Supervisory Framework on Bank Use of Super Intelligence (Nov. 2026) (US)

Interpretation
: Rafael Duarte, 2026-11-09 Demonstration content — a named synthetic reviewer's reading, not a real compliance opinion.

Policy
: BNK-POL-142 v1

Declared Control
: Example National Bank SI Control Set (fictional) / SIC-142 (The vendor contract and the tenant configuration carry a no-training setting; the setting is verified at each review.)

Evidence Required
: Record the vendor training setting and the date it was last verified.

On Violation
: suspend_capability + escalate(Chief Privacy Officer)

Approving Authority
: Rafael Duarte (Chief Privacy Officer)

Revalidation Watch
: trig-regulation-amendment, trig-periodic

7/7 record links present

privacy.cross_border_processing_declared — data

Where this system's data is stored and processed must be recorded, and a change of location must be reviewed.

Authority
: OCC Supervisory Framework on Bank Use of Super Intelligence (Nov. 2026) (US)

Interpretation
: Rafael Duarte, 2026-11-09 Demonstration content — a named synthetic reviewer's reading, not a real compliance opinion.

Policy
: BNK-POL-143 v1

Declared Control
: Example National Bank SI Control Set (fictional) / SIC-143 (Deployment regions are declared environments in the record; a new region needs a privacy review.)

Evidence Required
: Record each processing region and the review that approved it.

On Violation
: escalate(Chief Privacy Officer)

Approving Authority
: Rafael Duarte (Chief Privacy Officer)

Revalidation Watch
: trig-regulation-amendment, trig-data-reclassification, trig-periodic

7/7 record links present

third_party.provider_agent_scope_declared — scope

Each provider agent that interacts with this system's data or tools must be declared with its identity, its authority, the tools it may use, the data it may use and its escalation limit.

Authority
: OCC Supervisory Framework on Bank Use of Super Intelligence (Nov. 2026) (US)

Interpretation
: Corinne Baptiste, 2026-11-09 Demonstration content — a named synthetic reviewer's reading, not a real compliance opinion.

Policy
: BNK-POL-151 v1

Declared Control
: Example National Bank SI Control Set (fictional) / SIC-151 (A provider agent is admitted only with an entry carrying identity, scope, tools, data use and escalation limit.)

Evidence Required
: Record each provider agent interaction against its declared scope.

On Violation
: block_action + escalate(Head of Third-Party Risk)

Approving Authority
: Corinne Baptiste (Head of Third-Party Risk)

Revalidation Watch
: trig-regulation-amendment, trig-model-version, trig-cve, trig-vendor-tos, trig-new-tool-grant, trig-periodic

7/7 record links present

third_party.incident_notification_timeline — control

Where a vendor or this bank's own staff identify an SI incident (hallucination, misfire, drift or manipulation) on this system, it must be recorded and notified within the timeline in the bank's incident policy.

Authority

OCC Supervisory Framework on Bank Use of Super Intelligence (Nov. 2026) (US)

Interpretation

Corinne Baptiste, 2026-11-09 Demonstration content — a named synthetic reviewer's reading, not a real compliance opinion.

Policy

BNK-POL-152 v1

Declared Control

Example National Bank SI Control Set (fictional) / SIC-152 (Incidents are recorded with their kind and timestamps; the incident policy sets the notification hours per kind.)

Evidence Required

Record each incident with its kind, when it was observed, when it was reported and who was notified.

On Violation

escalate(Head of Third-Party Risk)

Approving Authority

Corinne Baptiste (Head of Third-Party Risk)

Revalidation Watch

trig-regulation-amendment, trig-model-version, trig-cve, trig-vendor-tos, trig-periodic

7/7 record links present

third_party.vendor_change_notice — control

A vendor of this system must give notice of new SI functionality or a changed model before it reaches this system.

Authority

OCC Supervisory Framework on Bank Use of Super Intelligence (Nov. 2026) (US)

Interpretation

Corinne Baptiste, 2026-11-09 Demonstration content — a named synthetic reviewer's reading, not a real compliance opinion.

Policy

BNK-POL-153 v1

Declared Control

Example National Bank SI Control Set (fictional) / SIC-153 (The vendor contract carries a change-notice clause; a vendor notice opens a change review.)

Evidence Required

Record each vendor change notice and the review it opened.

On Violation

escalate(Head of Third-Party Risk)

Approving Authority

Corinne Baptiste (Head of Third-Party Risk)

Revalidation Watch

trig-regulation-amendment, trig-model-version, trig-cve, trig-vendor-tos, trig-periodic

7/7 record links present

cyber.prompt_injection_tested — evidence

This system must be tested against prompt injection and jailbreaking, with the result recorded, before use and after a material change.

Authority
: OCC Supervisory Framework on Bank Use of Super Intelligence (Nov. 2026) (US)

Interpretation
: Mei-Lin Tran, 2026-11-09 Demonstration content — a named synthetic reviewer's reading, not a real compliance opinion.

Policy
: BNK-POL-161 v1

Declared Control
: Example National Bank SI Control Set (fictional) / SIC-161 (A release gate requires a prompt-injection test result for the current version.)

Evidence Required
: Record each prompt-injection test with its date, version and result.

On Violation
: block_action + escalate(Chief Information Security Officer)

Approving Authority
: Mei-Lin Tran (Chief Information Security Officer)

Revalidation Watch
: trig-regulation-amendment, trig-cve, trig-periodic

7/7 record links present

cyber.agent_identity_privileged — control

This system's identity and credentials must be governed as a privileged identity, with logged use and an acceptable-use basis.

Authority
: OCC Supervisory Framework on Bank Use of Super Intelligence (Nov. 2026) (US)

Interpretation
: Mei-Lin Tran, 2026-11-09 Demonstration content — a named synthetic reviewer's reading, not a real compliance opinion.

Policy
: BNK-POL-162 v1

Declared Control
: Example National Bank SI Control Set (fictional) / SIC-162 (Agent credentials are issued from the privileged-access vault and every use is logged.)

Evidence Required
: Record each credential issuance and use for the system's identity.

On Violation
: escalate(Chief Information Security Officer)

Approving Authority
: Mei-Lin Tran (Chief Information Security Officer)

Revalidation Watch
: trig-regulation-amendment, trig-cve, trig-periodic

7/7 record links present

cyber.least_privilege_tools — prohibition

This system may not hold a tool or permission its declared purpose does not need.

Authority
: OCC Supervisory Framework on Bank Use of Super Intelligence (Nov. 2026) (US)

Interpretation
: Mei-Lin Tran, 2026-11-09 Demonstration content — a named synthetic reviewer's reading, not a real compliance opinion.

Policy
: BNK-POL-163 v1

Declared Control
: Example National Bank SI Control Set (fictional) / SIC-163 (Tool grants are generated from the record's declared tools; additional grants need a new version.)

Evidence Required
: Record the tools granted to the system and compare them with the declared tools.

On Violation
: suspend_capability + escalate(Chief Information Security Officer)

Approving Authority
: Mei-Lin Tran (Chief Information Security Officer)

Revalidation Watch
: trig-regulation-amendment, trig-cve, trig-periodic

7/7 record links present

monitoring.thresholds_defined — control

Performance metrics, the thresholds that trigger review, and the escalation path must be defined for this system and calibrated to its consequence.

Authority
: OCC Supervisory Framework on Bank Use of Super Intelligence (Nov. 2026) (US)

Interpretation
: Samuel Adeyemi, 2026-11-09 Demonstration content — a named synthetic reviewer's reading, not a real compliance opinion.

Policy
: BNK-POL-171 v1

Declared Control
: Example National Bank SI Control Set (fictional) / SIC-171 (Monitoring configuration carries a metric, a threshold, a review trigger and an escalation target.)

Evidence Required
: Record each metric reading against its threshold and any trigger raised.

On Violation

escalate(Head of Model Risk Management)

Approving Authority

Samuel Adeyemi (Head of Model Risk Management)

Revalidation Watch

trig-regulation-amendment, trig-eval-regression, trig-periodic

7/7 record links present

monitoring.drift_monitored — evidence

Changes in this system's input population, in its model version, and in its prompts or tools must be monitored and reviewed.

Authority

OCC Supervisory Framework on Bank Use of Super Intelligence (Nov. 2026) (US)

Interpretation

Samuel Adeyemi, 2026-11-09 Demonstration content — a named synthetic reviewer's reading, not a real compliance opinion.

Policy

BNK-POL-172 v1

Declared Control

Example National Bank SI Control Set (fictional) / SIC-172 (A drift monitor compares input distributions and version fingerprints with the validated baseline.)

Evidence Required

Record each drift measurement and any review it triggered.

On Violation

escalate(Head of Model Risk Management)

Approving Authority

Samuel Adeyemi (Head of Model Risk Management)

Revalidation Watch

trig-regulation-amendment, trig-eval-regression, trig-periodic

7/7 record links present

testing.adversarial_before_deployment — evidence

This system must undergo adversarial testing with misleading, malicious and edge-case inputs before deployment.

Authority

OCC Supervisory Framework on Bank Use of Super Intelligence (Nov. 2026) (US)

Interpretation

Mei-Lin Tran, 2026-11-09 Demonstration content — a named synthetic reviewer's reading, not a real compliance opinion.

Policy

BNK-POL-181 v1

Declared Control

Example National Bank SI Control Set (fictional) / SIC-181 (The release gate requires an adversarial test report for the current version.)

Evidence Required
: Record each adversarial test with its date, version and findings.

On Violation
: block_action + escalate(Chief Information Security Officer)

Approving Authority
: Mei-Lin Tran (Chief Information Security Officer)

Revalidation Watch
: trig-regulation-amendment, trig-eval-regression, trig-periodic

7/7 record links present

testing.red_team — evidence

This system must be red-teamed, by independent or external expertise where internal capability is limited, covering detection, containment, response and recovery.

Authority
: OCC Supervisory Framework on Bank Use of Super Intelligence (Nov. 2026) (US)

Interpretation
: Mei-Lin Tran, 2026-11-09 Demonstration content — a named synthetic reviewer's reading, not a real compliance opinion.

Policy
: BNK-POL-182 v1

Declared Control
: Example National Bank SI Control Set (fictional) / SIC-182 (A red-team exercise is scheduled before release of any Tier 1 system and repeated after a material change.)

Evidence Required
: Record each red-team exercise with its team, date, scope and findings.

On Violation
: block_action + escalate(Chief Information Security Officer)

Approving Authority
: Mei-Lin Tran (Chief Information Security Officer)

Revalidation Watch
: trig-regulation-amendment, trig-eval-regression, trig-periodic

7/7 record links present

testing.live_hallucination_sampling — evidence

Live outputs of this system must be sampled after deployment and checked for hallucination, with categories requiring human verification defined.

Authority
: OCC Supervisory Framework on Bank Use of Super Intelligence (Nov. 2026) (US)

Interpretation
: Mei-Lin Tran, 2026-11-09 Demonstration content — a named synthetic reviewer's reading, not a real compliance opinion.

Policy

BNK-POL-183 v1

Declared Control

Example National Bank SI Control Set (fictional) / SIC-183 (A sampling job draws live outputs on a schedule and routes them to reviewers.)

Evidence Required

Record each sample with its size, the number of hallucinations found and the follow-up.

On Violation

escalate(Chief Information Security Officer)

Approving Authority

Mei-Lin Tran (Chief Information Security Officer)

Revalidation Watch

trig-regulation-amendment, trig-eval-regression, trig-periodic

7/7 record links present

Provider Agents

Provider agents not declared. The boundary does not address provider agents; that is unknown, not a statement that there are none.

Authorities Pending As Of 2026-11-24 (0)

None. Every authority this system is in scope of was already applying when the boundary was proposed.

Operating Envelope

None declared. This record makes no claim about the variation the system may undergo, so every reported change is judged by the registry's signal table.

Incidents Recorded Against This Version (0)

Each row is a separately signed incident filed against this version of the record. Incidents are not part of this record's signed payload or digest. The recording deadline is computed from the incident policy the incident names and is compared with the instant the incident was recorded in this registry. It measures recording here, not any notification to a supervisor or a customer, which this record does not carry. A deadline that could not be computed is shown as not determined, with the reason.

No incident has been recorded against this version.

Approvals

Concurrences (6)

Mei-Lin Tran as Chief Information Security Officer

2026-11-24T22:02:09.380241+00:00 · Algorithm: Ed25519 · Key ID: mei-lin-tran-demo

Samuel Adeyemi as Head of Model Risk Management

2026-11-24T22:02:09.390894+00:00 · Algorithm: Ed25519 · Key ID: samuel-adeyemi-demo

Corinne Baptiste as Head of Third-Party Risk

2026-11-24T22:02:09.400773+00:00 · Algorithm: Ed25519 · Key ID: corinne-baptiste-demo

Helena Voss as Chief Data Officer

2026-11-24T22:02:09.411289+00:00 · Algorithm: Ed25519 · Key ID: helena-voss-demo

Priya Raman as Chief Risk Officer

2026-11-24T22:02:09.444117+00:00 · Algorithm: Ed25519 · Key ID: priya-raman-demo

Rafael Duarte as Chief Privacy Officer

2026-11-24T22:02:09.454283+00:00 · Algorithm: Ed25519 · Key ID: rafael-duarte-demo

Signature and Record Integrity

Canonical Digest
: sha256:6d839dda670baad4a11a0905e7f45aae1e1229595c0145923a50fd39a80409
Regulatory Corpus Version
: 1.0.0
Regulatory Corpus Digest
: sha256:bf8ba9b863767934d7483bf3b791a87aa0bece3578b762be33943a782c580
Institution Policy Pack Digest
: sha256:ac70974e4bf4c8f75a0212ed53bee247fce510c0ec24097e80439d178d12d3

Check this record offline; cryptographic checks do not establish control effectiveness or legal compliance:

```
alv-verify EXAMPLE-BANK-CREDIT-MEMO.json --jwks institution_jwks.json
```

This memorandum is a rendered projection of the signed contract above; the signed digest is the record of authority.