# Fraud Risk, Big Data, Emerging Compliances (Focus on Retail)



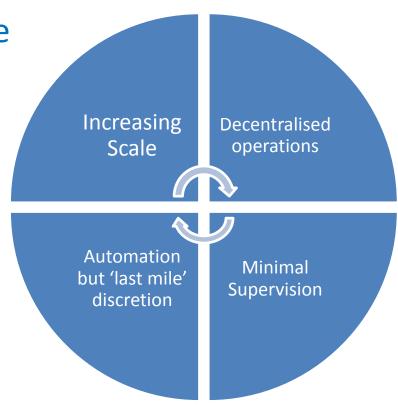
*Natarajan.S* 30.07.2016

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#### Fraud Risk - Overview

Certain Business
 Imperatives increase
 fraud risks



#### Fraud Risks – Overview

# Store Collections

- Cash related
- Credit sales/cheque sales
- Credit Notes/Gift Vouchers

# Inventory

- Shrink/Defectives/Expiry
- Logistics
- Procurement related

# **Loyalty Cards**

- Misuse by store staff
- Redemption frauds

# Billing Related

- Incorrect prices
- Discounts

# Fraud Risks – Overview

Sales & Supply Chain	Logistics & Distribution
Bulk Sales	Transportation inefficiencies
<ul><li>Vendor related frauds</li><li>Loss of Margins</li></ul>	<ul> <li>Distribution/Warehousing-process gaps</li> </ul>

Sales Promotions	Marketing (events/media)
Manipulation of trade promotion	Manipulation of marketing spends
schemes	

Payroll	Bribery/Corruption
<ul> <li>Inclusion of ghost employees in payroll processing documents including salary</li> <li>Ghost employees/Ex-employees</li> </ul>	<ul> <li>Improper payments various approving authorities</li> <li>Appointment of third parties to make payments to obtain licences/permissions/</li> </ul>
included in sales incentive pay- outs/travel allowance/Dearness Allowance payouts	<ul> <li>sales orders</li> <li>Misrepresentation of transactions in accounting records</li> <li>Invoices submitted and paid for goods not received/services never performed</li> </ul>

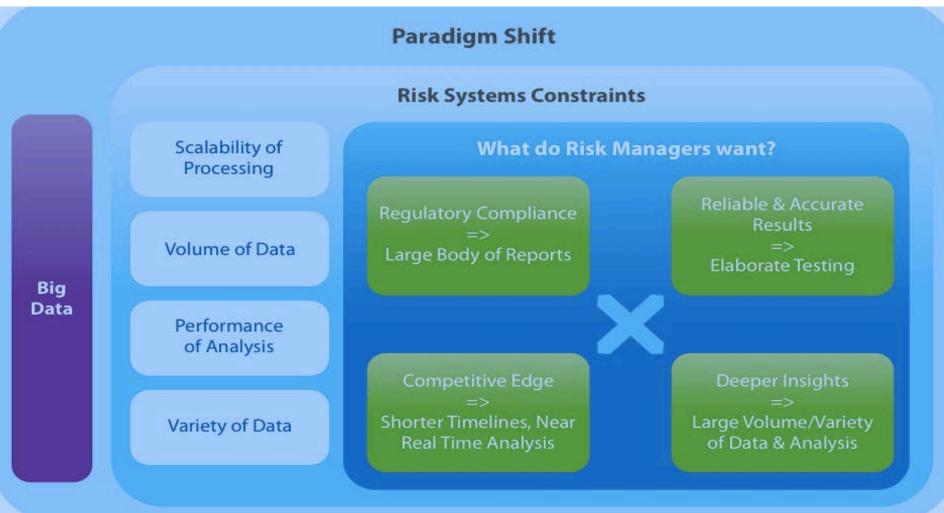
#### Fraud Risk - Overview

Risk Management Cycle



- Faced with disruptive competition, businesses require deeper insight and scalable analytics through near real-time systems to mitigate risks.
- Risk Management is increasingly about deploying Big Data analytics to monitor and control risks.

Risk Management Cycle (contd...)



Relevance of Big Data in Risk Management-extracted from TCS ERM presentation-published online

# Big data analytics - Perspectives

Legacy System Limitations

for workflows, not all are automated

Data Warehousing- Volumes hamper speed

Data Dredging until "confession"

More Relevant for static data

Incapable of processing unstructured data from 'data lakes'

# Big data analytics - Perspectives

How Big Data analytics is different ...

Source data not in a siloed, prescriptive store

All types of data retained in their original formats

Allows users to run ad hoc queries, perform cross-source navigation and make analytical decisions-all based on real-time information.

Volume, Velocity, Variety

# Big data analytics - Perspectives

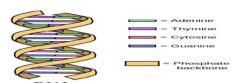
- Examples of Big data analysis...
  - Search Engines on Research journals –to 'trim' contents to answer specific search

Genetic studies- Analyse samples to diagnose based on a database of probable outcomes

'clicks to book'

Online movie tickets – reduce the



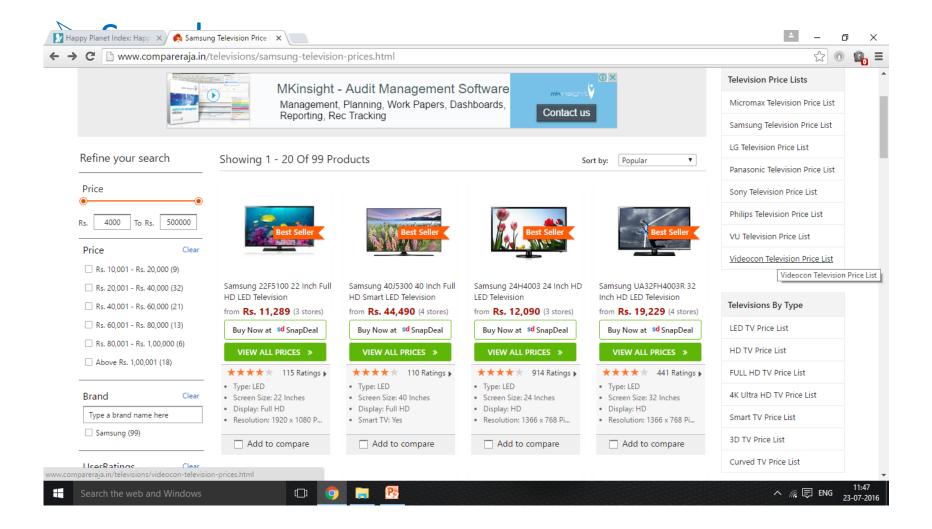






Aadhaar Card –Big Data and more

# Examples of Big data analysis( contd...)



'ticket size' of customer – Basket analysis



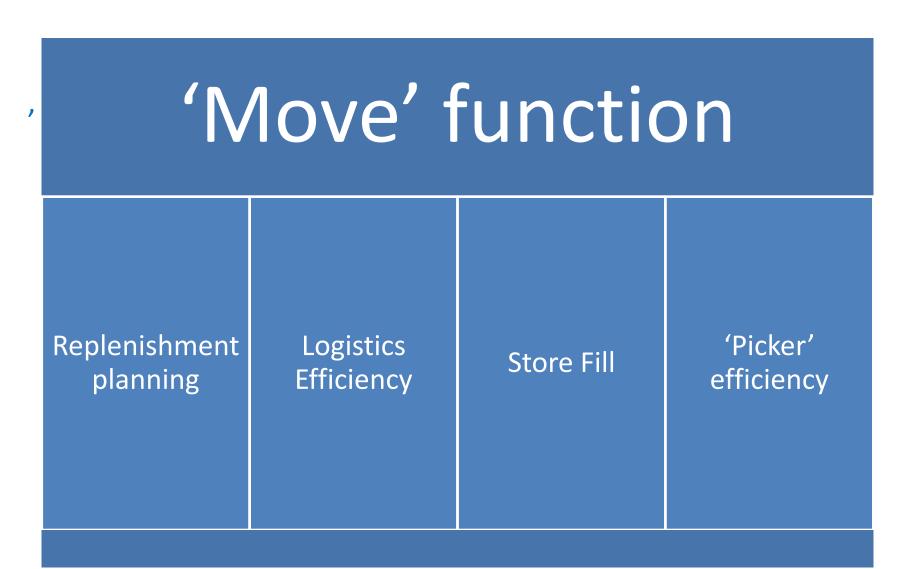
 Drive revenue through suggestive assortments for every 'shopping segment'

 Personalised shopping experience – download customer tastes/preferences at the sales counter





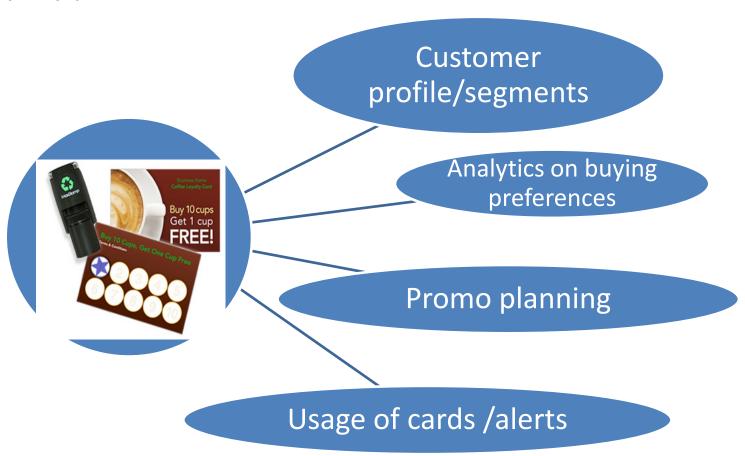
Margin Analysis
Promo Schemes
Inventory
monitoring/seasonal
sales
rate





Stock right products SKUs-better monitoring Pricing Pricing allocations Optimise Space allocations Pricing Stock right SKUs-better monitoring Post traffic Collections / efficiency

Loyalty plans



Audit Challenges

Increasing Digitisation of Audit Evidence

Dynamic IT environment

Need to Establish Reliability / Accuracy in a Digital Ecosystem

Satisfy the mandated standards of Proficiency and due professional care

Audit function has to adopt work plans which have significant emphasis on IT audits and transaction checks are essentially exceptions review through Data analytics.

#### **Audit of Procurement:**

- Margin review
- Analytics on Purchase Order Prices
- VAT implications on Margins
- Incentive Claims/Credit Notes
- Transaction analysis
- Master Data checks

# Audit of Supply Chain function:

- Analytics is the primary tool to check :
  - Replenishment Parameters- DC and Stores
  - Lead time assumptions
  - Logistics efficiency
  - Inventory levels/Cycle count
  - Transaction analysis

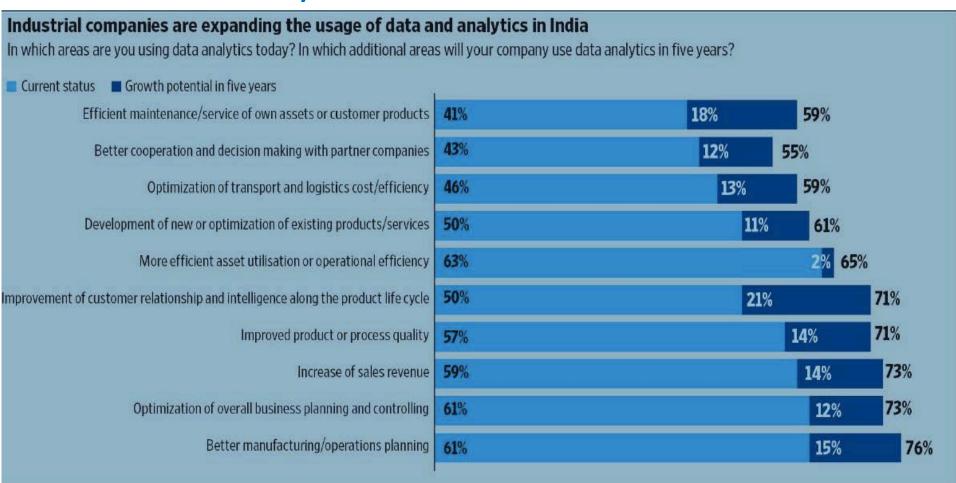
# Audit of Store Operations:

# Reviews are backed by Extensive Data Analytics on :

- Sales to collections timelines, completeness, systemic gaps
- Billing related Master data, data flow to ERP, transaction exceptions
- Markdown process , Scheme sales
- Loyalty Cards and Gift Cards

# Big Data Adoption in India

# PWC Survey



# **Emerging Compliances**

- Section 143 (12) of Companies Act mandates 'Auditors' of a company to report on 'fraud' noticed while performing the duties of auditor-effective for accounting years commencing on or after 1<sup>st</sup> April 2014.
- The meaning of fraud is defined in section-447 of the Act.
- The position 'Auditor' refers to:
- ✓ Statutory Auditors
- ✓ Cost Audit under Section-148
- ✓ Branch Auditors-Section-139
- ✓ Company Secretary Section-204

# **Emerging Compliances**

- As per ICAI guidance note, the following are the prerequisites to reporting under Sec-143(12):
- ✓ Detected in the course of performance of duties as auditor
- ✓ Auditor has sufficient evidence that fraud exists
- ✓ Fraud is committed by officers or employees of the company .
- One more bifurcation in reporting frauds identified by auditor and those already identified by the company or attest reports under other enactments
- Guidance note has also given guidelines on reporting procedure basis the circular issued by Ministry of Corp.Affairs in Dec.'15

# Reporting on fraud identified by Auditor

Fraud involves value => Rs.1 Crore.

# Step1

- Auditor to report to Board/Audit Committee (AC) within 2 days of knowledge of fraud
- Specify nature, description, approx. amount and parties involved

#### Step 2

ACM/Board to reply within 45 days

# Step 3

• Auditor to report to Central Government with Board /ACM response within 15 days thereof.

# Reporting on fraud identified by Auditor

Report such fraud to Board/ Audit Committee (as applicable)

- Within 2 days of knowledge of fraud
- Specify nature, description,approximate amount andparties

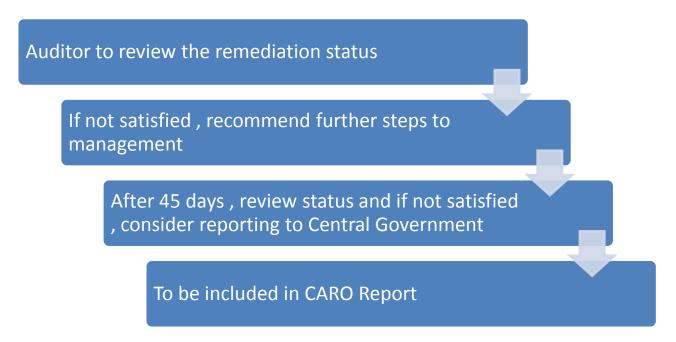
Fraud involves involves value less than Rs. 1 crore

Board Report to disclose:

- nature of fraud,
- approximate amount
- parties involved and
- remedial action taken

# Reporting on fraud detected by management

Fraud involves value = or > Rs.1 Crore



Fraud involves value < Rs.1 Crore → To be included in CARO Report

# ..Other points on reporting

- For frauds pertaining to years earlier than 1<sup>st</sup> April 2014, auditor has to report only if:
- ✓ the fraud is identified in the course of performance of duties for financial year commencing on or after 1<sup>st</sup> April 2014.
- ✓ Report to the extent the same was not dealt with in the financial statement or Audit report of prior years
- For a banking company, the auditor has to report u/s-143(12) to the Reserve Bank apart from the Board and Central Government.

# Reporting under section 143(3) of the Companies Act

- The section mandates Statutory auditors to report to shareholders on adequacy of Internal Controls on financial reporting
- The scope of review covers broadly the following :
- ✓ Listing of risks and controls implemented for all processes impacting financial transactions
- ✓ Evidence to be provided by company process owners that Controls are in place and working effectively as on review date.
- ✓ So the section is a holistic check by auditors that company has adequate controls to prevent/detect fraud risks, if any, by internal staff or suppliers or customers.
- A separate report, similar to CARO, is issued by auditors forming part of Audit report to shareholders.

# Thank You