

# Diagnosing the Gap in Operational Requirements for the Compliance Management System According to the International Standard ISO 37301:2021 In the General Management of Al-Rasheed Bank / An Applied Research

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## Abstract

*The research deals with diagnosing the gap in the 8th requirement (operations) of the Compliance Management System according to the international standard (ISO 37301:2021) at the General Administration of Al-Rashid Bank, which concerns the planning, implementation, and control of processes and procedures designed to address risks and opportunities. The problem of the research lies in the failure to adopt a compliance management system as per the ISO 37301:2021 standard, which has affected the performance of its banking tasks and exposed it to non-compliance risks. Therefore, a compliance management system is required to reduce the likelihood of such risks, which is the main objective of the research. The study compares the current operations of the compliance management system at Al-Rashid Bank with the operational requirements specified in ISO 37301:2021, using audit checklists for this requirement in order to diagnose non-compliance gaps and provide a qualitative analysis of the existing gap. The research relied on percentages and weighted arithmetic means, and found that the application and documentation of the operational requirement at the bank were insufficient, with a gap percentage of 45.84%. Thus, addressing these gaps requires improvements and system reviews to reduce them.*

**Keywords:** Gap, Operational Requirement, Banking Compliance Management System.

## Introduction

Banks operate in an environment that requires awareness and knowledge of an increasing number of laws, regulations, and regulatory guidelines for conducting business across various fields. Compliance is considered one of the most important factors for the stability of banks and the preservation of their reputation and credibility. The international standard for compliance management systems (ISO 37301:2021) has emerged to ensure organizations adhere to the most important international and local compliance standards. Banks, as one of these organizations, face numerous and diverse risks due to their banking operations, which often result from non-compliance with laws and regulations. Thus, implementing these requirements, including operational requirements, is a management system aimed at developing and enhancing the performance of banks. This requirement focuses on the planning of organizations and controlling the operational aspects of their compliance management systems by implementing and monitoring what has been planned, as well as establishing controls and procedures for them. Accordingly, the structure of the research consists of four sections: The first section addresses the research methodology. The second section focuses on the theoretical aspect of the research, whereas the third section presents the practical aspect of the research. Finally, the fourth section emphasizes the conclusions and recommendations.

### *Section One: Research Methodology*

#### *First: Research Problem*

Through field observation by the researchers at the General Administration of Al-Rasheed Bank, it was found that the bank's management demonstrates weaknesses and shortcomings in planning, implementing, and monitoring banking operations. This is despite the presence of a compliance management unit responsible for ensuring the bank's daily operations adhere to legal, regulatory, and procedural

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requirements. Accordingly, the research problem is framed by the following question: What is the extent of the gap between the actual operational reality of compliance management at Al-Rasheed Bank and the requirements for implementing the operational clauses of the international standard (ISO 37301:2021)?

#### *Second: Research Importance*

- The research enriches the knowledge base on the important subject of the international compliance management system standard (ISO 37301:2021), highlighting the need for further studies in this field.
- It aids the General Administration of Al-Rasheed Bank in assessing the level of operational compliance with the standard and diagnosing the gap between the actual situation and the requirements of the standard.
- The study focuses on the banking sector, a vital industry critical to the country's economic development.

#### *Third: Research Objectives*

- To study the level of application of the operational requirements specified in the international standard (ISO 37301:2021) at Al-Rasheed Bank.
- To identify the gap between the actual operational practices and the international standard requirements for implementing and documenting the operational clauses in compliance with ISO 37301:2021.

#### *Fourth: Research Methodology*

The study adopts a descriptive-analytical approach to collect data and information describing the phenomenon using a checklist, along with direct observation and field engagement, aiming for an accurate interpretation of the results.

#### *Fifth: Research Limits*

- Time Limits: The research was conducted from (7/1/2024) to (28/5/2024).
- Spatial Limits: The study was implemented at the General Administration of Al-Rasheed Bank, located in Baghdad.

#### *Sixth: Sources of Data Collection*

*Theoretical Aspect:* The study utilized both Arabic and foreign scientific sources, including books, dissertations, theses, journals, and periodicals. Additionally, it adopted the international standard published by the International Organization for Standardization (ISO) and online resources.

#### *Practical Aspect*

Field Engagement: Direct interaction at the research site.

Personal Interviews were conducted with relevant stakeholders at the bank.

Checklist: A checklist was developed based on the operational requirements of the international standard (ISO 37301:2021). It aimed to diagnose the gap and identify its causes, consisting of four clauses and 18 questions. A 7-point Likert scale was used to measure the actual compliance level with the operational

requirements in comparison to the standard, with specific weights assigned to the checklist responses, as detailed in Table (1).

Table (1) Weights of Matching Extent						
Completely implemented			Partially implemented			
Completely documented	Partially documented	Non-documented	Completely documented	Partially documented	Non-documented	Not implemented and not documented."
6	5	4	3	2	1	0

Source: (Al Mustafa,2008:88) (Al-Khatib,2008:326)

#### *Seventhly, Tools of Data Analysis*

The weighted arithmetic mean is used to measure conformity with specification requirements according to the following equation: (Al-Hakeem & Al-Musawi, 2022:140)

$$A- \text{Weighted arithmetic mean} = \frac{\text{total of repetitions*weights}}{\text{No of questions in the requirement}}$$

$$B- \text{Implementation percentage} = \frac{\text{total of repetitions*weights}}{\text{No of questions in the requirement (highest weight of the scale)}} \times 100$$

C- Percentage. Gap = 100 - Percentage of conformity.

#### *Section Two: Theoretical Framework of the Research*

##### *First: Definition of Banking Compliance Management*

Banking compliance management refers to the regulation of all policies and processes in which a bank is involved, ensuring adherence to laws, regulations, instructions, decisions, codes of conduct, standards, and banking practices issued by local and international regulatory authorities. These authorities provide guidance, monitor and evaluate operations, and report on the bank's performance to its board of directors (Qteishat, 2019:246) (Ibrahim & Ali, 2019:317). (Sultan, 2020:26) and (Al-Abadi, 2021:46) defined it as an independent form of banking oversight aimed at ensuring compliance with laws, regulations, and instructions, reducing non-compliance risks, and preparing reports for the bank's board of directors and the central bank. (Al-Amiri, 2014:73) on the other hand, defined compliance management as a link between the bank and the central bank, monitoring adherence to all applicable laws and rules and ensuring compliance with banking legislation and instructions. Based on these definitions, the researchers propose an operational definition of banking compliance management: A comprehensive administrative process that involves a set of tasks and activities aimed at ensuring the commitment of the investigated bank's management to applicable laws, regulations, and policies. This ensures the safety of operations and personnel while strengthening trust between the bank and its customers.

##### *Second: The Importance of Banking Compliance Management*

The importance of banking compliance management lies in the following points (Benedek, 2012:139) (Yousef, 2013:5) (Sapountzi, 2016:45):

- It strengthens the bank's competitive position and preserves its reputation and the credibility of its financial statements.
- It also plays a crucial role in reinforcing customer confidence by meeting their expectations.
- Moreover, it acts as a positive factor in broadening the scope of work while serving as an effective tool for risk management.
- It enhances operational processes and activities, boosts work efficiency, and improves the quality of services.
- Furthermore, it identifies errors to prevent the bank from incurring penalties due to non-compliance with legal and regulatory frameworks (Abd-Ali & Lafta, 2021:4147).

#### *Third: Objectives of Banking Compliance Management*

According to (Al-Yawar & Sultan, 2021:37) and (Al-Abadi, 2021:47-48), banking compliance management aims to achieve the following objectives:

- **Building and Maintaining Trust:** Establishes and maintains confidence in the financial system.
- **Know Your Customer (KYC) Principle:** Ensures disclosure and identification of funding sources, aiding in the detection of illegal activities such as money laundering, terrorism financing, and financial crimes.
- **Defining Relationships and Responsibilities:** Establishes a general framework clarifying the relationship between compliance management, the board of directors, and senior management, including the responsibilities and impact of each.
- **Risk Assessment Collaboration:** Supports cooperation and coordination with the risk management department to assess and identify internal and external risks.
- **Strategic Guidance:** Provides advice and suggests plans to efficiently and effectively implement the bank's vision and mission (Dawood & Ahmed, 2023:23).

#### *Fourth: Benefits of Banking Compliance Management*

(Kamal & Samira, 2015:120) and (Taybi & Belkhader, 2019:448) outlined the following benefits of implementing banking compliance management:

- **Mitigation of Non-Compliance Risks:** Particularly those related to laws and regulations issued by regulatory authorities.
- **Promotion of Good Governance:** Establishes principles of sound management within banking institutions.
- **Crime Prevention Mechanisms:** Develop frameworks and mechanisms to address crimes such as money laundering and terrorism financing.
- **Preservation of Professional Standards:** Upholds ethical values and professional practices in banking operations.

- **Strengthened Regulatory Relationships:** Enhances relationships with regulatory authorities through effective communication (Abbas & Mahamed, 2021:54).

#### *Fifth: Challenges of Banking Compliance Management*

Banking compliance management faces several challenges that banks must address (Focal, 2024:4) (Cena, 2024:5):

- **Complex Regulations and Legislation:** Compliance officers often find the regulations to be overly complex, requiring comprehensive understanding and interpretation.
- **Frequent Regulatory Changes:** The constant evolution of regulatory requirements adds another layer of complexity, making it difficult for compliance staff to keep pace.
- **Agility in Compliance Strategies:** As compliance rules and laws evolve, compliance teams must not only stay updated but also adapt and adjust strategies accordingly. Flexibility is essential for any compliance department (Ali & Lafta, 2023:433).
- **Resource Challenges:** Insufficient resources, both financial and human, pose a significant obstacle to effective compliance management.
- **Cross-Border Compliance Complexities:** Operating across different countries introduces additional challenges due to varying regulations and legal frameworks, requiring tailored approaches and alignment with international standards.
- **Risk Management in Compliance:** A critical challenge is managing risks proactively, necessitating strategies to identify risks in advance and act accordingly.

#### *Sixth: Risks of Non-Compliance*

Non-compliance risks refer to a bank's failure to adhere to laws, regulations, rules, standards, and systems, which can negatively impact the institution. These risks expose the bank to legal and regulatory sanctions, financial losses, and reputational harm (Misha, 2016:171) (Kattan, 2020:19) defines these risks as arising from employees violating or improperly applying regulatory rules and laws, leading to penalties such as fines or restrictions on certain activities. Specialized literature identifies the following types of non-compliance risks:

##### *Legal Risks*

(Khalil and El-Sayed, 2017:211) defined legal risks as the inability to execute contracts due to the absence of or poor documentation, or the counterparty not possessing all the necessary authority to contract. Similarly, (Al-Sayegh, 2018:121) defined them as risks arising from violations or non-application of laws, regulations, instructions, and controls governing and regulating banking operations, or the lack of a clear definition of legal rights and obligations in banking operations (Hussein & Lafta, 2024:1596).

##### *Reputational Risks*

Reputation is a critical asset for banks, as they are entrusted with safeguarding customers' funds and transactions (Al-Rubaie & Radi, 2011:169). (Ibrahim & Ali, 2019:334) define reputational risks as those stemming from operational failures or negative perceptions of the bank, leading to loss of funding sources and customer attrition to competitors (Salman & Al-Nasir, 2016:201).

*Strategic Risks*

These risks arise from the absence of a well-defined strategy guiding the bank's short- and long-term objectives, considering environmental conditions and competitive factors. Failure to identify and mitigate risks or make incorrect strategic decisions can harm the bank's performance and competitiveness (Habib & Abdulraheem, 2021:236) (Dheeb et al, 2018:38) (Al-Nusairi, 2011:175).

*Financial Risks*

Financial risks involve issues related to core profit-generating activities, such as credit risks, currency risks, liquidity risks, interest rate risks, and market risks (Awad, 2015:39). These risks also reflect potential cash flow deficiencies, which could hinder the bank's ability to meet obligations (Muhammad & Abdul Karim, 2023:82).

*Professional Risks*

These risks stem from the lack of adherence to professional ethics and deficiencies in banking ethical culture. Disregarding for professional ethics can lead to common operational issues in the banking sector, such as negligence, professional errors, or risks tied to legal accountability (Al-Shabib, 2011:20).

*Operational Risks*

Operational risks include errors that occur during operations, such as breaches of the bank's accounting systems, inadequate system design, or misuse by customers (Afana, 2018:141).

*Seventh: Definition of the International Standard ISO 37301:2021*

Before addressing the definition of the international standard specification (ISO 37301:2021), it is essential to clarify the concept and origin of the term ISO, which is an abbreviation for the *International Organization for Standardization*. This organization is dedicated to standardization and control, consisting of national standardization bodies from approximately 165 member countries. It brings together experts from various nations to contribute to the development of voluntary international standards that are consensus-based and aligned with market needs, providing solutions to global issues. The organization began its work in 1947 and is headquartered in Geneva, Switzerland (Boubriha & Qashi, 2022:34) (Alfaihan & Abdul Baqi, 2016:70).

Both (Norimarna, 2021:4) and (Spano & Renna, 2023:2) defined the international standard ISO 37301:2021 as the latest globally recognized standard for compliance management systems. Its requirements are characterized by flexibility, acknowledging that each organization is responsible for determining its specific compliance management system needs and how to implement the recommended practices. Meanwhile, (Arifin, 2024:29) and (Muscad, 2023:1) described it as a benchmark that enables organizations to verify their compliance management systems and obtain certifications from an independent external body.

Based on these perspectives, the researchers developed an operational definition of the international standard: It is an internationally recognized standard prepared by the International Organization for Standardization. It comprises a set of requirements providing guidelines for establishing, developing, implementing, and maintaining a compliance management system. This standard aims to assist banks in achieving their strategic objectives by reducing and detecting non-compliance risks in a timely manner, thereby protecting them from losses resulting from violations.

*Eighth: The Importance of Implementing the International Standard (ISO 37301:2021)*

(Vasilievna, 2021:22), (Sollitto, 2024:5), and (Brun, 2022:12) outlined the significance of implementing the (ISO 37301:2021) standard in banks, highlighting the following points:

- This standard demonstrates that banks have taken all necessary precautions to prevent non-compliance risks.
- It enhances competitive positioning (Hamed & Hanan, 2019:174).
- It emphasizes the importance of addressing the needs and expectations of all stakeholders.
- It provides an accurate measure for assessing workplace ethics and ethical behavior in the bank.
- It serves as a benchmark for judicial authorities in evaluating regulatory compliance obligations.

*Ninth: Objectives of Applying the International Standard (ISO 37301:2021)*

The (ISO 37301:2021) standard aims to achieve several objectives in banks, including: (Coglianese & Nash, 2021:4) (Arifin, 2024:30) (Bleker & Hortensius, 2014:5)

- Assists banks in improving and expanding their current compliance management approach.
- Strives to meet the needs and expectations of a broad range of customers.
- Embeds compliance management into the organizational culture, influencing employees' behaviors and attitudes.
- Creates a work environment characterized by fair competition with both public and private banks.
- Provides a hotline for reporting non-compliance to minimize breach risks and mitigate reputational damage.
- Enhances quality and productivity, boosting external stakeholders' confidence in the bank's ability to achieve sustainable success.

*Tenth: Requirements and Clauses of the International Standard (ISO 37301:2021)*

The (ISO 37301:2021) standard is based on the PDCA cycle (Plan-Do-Check-Act) developed by Deming, which serves as the foundation for most ISO standards in quality management (Jassim & Lafta, 2023:207). The PDCA cycle can be applied to all processes and quality management systems (Sh & Lafta, 2022:6888). The term "quality" is widely recognized and applied by various organizations, with its definitions differing depending on researchers' perspectives, roles, and areas of expertise (Jawad & Al-Obaidi, 2014:264).

The international standard comprises ten main and sub-requirements, which further branch into several sub-clauses. This study focuses on the requirement titled "8- Operation", which emphasizes organizational planning and control over the implementation of compliance management system requirements by executing and monitoring what has been planned. This requirement includes the following clauses:

- 8-1 Operational Planning and Control
- 8-2 Establishing Controls and Procedures
- 8-3 Raising Concerns
- 8-4 Investigation Processes



*Chapter Three: The Applied Aspect of the Research*

This chapter aims to present and evaluate the results of the checklist related to measuring the level of implementation and documentation of the operational requirement according to the provisions of the international standard ISO 37301:2021, in the studied bank. The goal is to understand how well the bank has implemented the clauses of this requirement and to identify the gap for each clause by discussing the following sections:

First: Presentation and Evaluation of the Results of the Checklist for Requirement (8- Operation)

*Operational Planning and Control*

The checklist results are presented in Table 2, which outlines the evaluation of clause (Operation/8-1: Operational Planning and Control), containing 5 questions as follows:

**Table (2). Results of the Checklist for Clause (Operation/8-1: Operational Planning and Control)**

No	8- Operation	Scale						
	8-1 Operational Planning and Control	Completely implemented			Partially implemented			Not implemented & not documented
		Completely documented	Partially documented	Non-documented	Completely documented	Partially documented	Non-documented	
		6	5	4	3	2	1	
1.	The bank's management plans, implements, and monitors the operational needs required to meet the requirements and carry out specified procedures through:							
A-	Setting Standards for Operations	✓						
B-	Implementing process controls according to the established standards.		✓					
2.	Ensuring documented information is sufficiently available as evidence that operations have been executed as planned.					✓		
2.	The bank's management controls planned changes, reviews their unintended consequences, and takes action to mitigate their negative effects.							✓
3.	The bank's senior management ensures that operations or information provided externally, related to	✓						



	the compliance management system, are subject to control.							
	Repetitions	2	1	0	0	1	0	1
	Result	12	5	0	0	2	0	0
	Weighted arithmetic mean	3.8						
	Percentage of conformity	% 63.33						
	Gap	% 36.67						

It can be observed from the results in Table 2 that the level of implementation and documentation for clause (8-1: Operational Planning and Control) in the studied bank achieved a score of **3.8** out of a possible 6 points, with a compliance percentage of 63.33%. This indicates a gap in non-compliance of 36.67%, caused by the following:

- **Partial Implementation and Documentation:** This is due to the weak general management of the bank, where the compliance officer retains only the quarterly and annual reports completed as evidence that operations were carried out as planned.
- **Lack of Implementation and Documentation:** This is due to the bank's failure to control and monitor planned changes and review them as much as possible, along with taking necessary actions to mitigate their negative effects.

#### *Establishing Controls and Procedures*

The checklist results in Table 3 outline the evaluation of clause (Operation/8-2: Establishing of Controls and Procedures), which contains a single question, as follows:

**Table (3). Results of the Checklist for Clause (Operation/8-2: Establishing Controls and Procedures)**

No	8- Operation	Scale						
	8-2 Establishing Controls and Procedures	Completely implemented			Partially implemented			Not implemented & not documented
		Completely documented	Partially documented	Non-documented	Completely documented	Partially documented	Non-documented	
		6	5	4	3	2	1	
1.	The bank's senior management implements controls for managing compliance obligations and the associated compliance risks, and reviews these procedures periodically to ensure their continued effectiveness.	✓						
	Repetitions	1						
	Result	6						
	Weighted arithmetic mean	6						
	Percentage of conformity	100%						
	Gap	0%						

It can be observed from the results in Table 3 that the level of implementation and documentation for clause (8-2: Establishing Controls and Procedures) in the studied bank achieved a score of 6 out of a possible 6 points, with a compliance percentage of 100%. This indicates that the bank has fully implemented and documented the standard, with no non-compliance gap. This is a result of the bank's establishment of controls and procedures for the compliance officer, which are reviewed periodically and annually approved by the Board of Directors.

### *Raising Concerns*

The checklist results in Table 4 outline the evaluation of clause (Operation/8-3: Raising Concerns), which contains 7 questions, as follows:

**Table (4). Results of the Checklist for Clause (Operation/8-3: Raising Concerns)**

No	8- Operation	Scale						
	8-3 Raising Concerns	Completely implemented			Partially implemented			Not implemented & not documented
		Completely documented	Partially documented	Non-documented	Completely documented	Partially documented	Non-documented	
		6	5	4	3	2	1	
1.	The bank's senior management encourages individuals or those associated with it to report attempted, suspected, or actual violations of the compliance policy or compliance obligations.							✓
2-	It should be visible and accessible throughout the bank.							
A-	Handling of confidential reports							✓
B-	Coping with confidential reports							✓
C-	Acceptance of anonymous reports.							✓
D-	Protection of those who report from retaliation.							✓
E-	Enabling employees to seek advice.							✓
3-	The bank's management ensures that all employees are aware of reporting procedures, their rights, and protections, and that they are capable of using them.							✓
	Repetitions	0	0	0	0	0	0	7
	Result	0	0	0	0	0	0	0
	Weighted arithmetic mean	0						
	Percentage of conformity	% 0						

	Gap	% 100
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It can be observed from the results in Table 4 that clause (8-3: Raising Concerns) in the studied bank achieved a score of 0 out of a possible 6 points, with a compliance percentage of 0%. This indicates a 100% non-compliance gap, which is due to the following reasons:

- There is no reporting of financial and administrative corruption or instances of non-compliance with laws and regulations by the employees.
- There is no mechanism for whistleblowers to ensure anonymity or confidentiality, nor is there a clear procedure for handling confidential or anonymous reports.
- Employees in the bank are afraid to report non-compliance issues, fearing for their jobs or facing harm and retaliation, especially when the violation or breach of law originates from higher-level authorities.

#### *Investigation Processes*

The checklist in Table 5 presents the evaluation results for clause (Operation/8-4: Investigation Process), which contains 5 questions, as follows:

**Table (5). Results of the Checklist for Clause (Operation/8-4: Investigation Processes)**

No	8- Operation	Scale						
	8-4 Investigation Processes	Completely implemented			Partially implemented			Not implemen- ted & not document- ed
		Comple- tely docume- nted	Partially docume- nted	Non- docume- nted	Comple- tely docume- nted	Partially docume- nted	Non- docume- nted	
		6	5	4	3	2	1	
1.	The bank's manageent develops, establishes, implements, and maintains processes to assess, investigate, and close reports related to suspected or actual non-compliance cases. These processes ensure that fair and impartial decisions are made.					✓		
2.	Investigations are conducted independently and without conflicts of interest by qualified individuals.	✓						
3.	The bank's management uses the results of investigations to improve the compliance management system, as needed.							✓
4.	The bank's senior management provides regular reports on the number and					✓		

	outcomes of investigations to the board of directors.							
5.	Documented information about the investigation process should be preserved	✓						
	Repetitions	2	0	0	0	2	0	1
	Result	12	0	0	0	4	0	0
	Weighted arithmetic mean	3.2						
	Percentage of conformity	% 53.33						
	Gap	% 46.67						

It can be observed from the results in Table 5 that the level of actual implementation and documentation for clause (8-4: Investigation Processes) in the studied bank achieved a score of 3.2 out of a possible 6 points, with a compliance percentage of 53.33%. This indicates a 46.67% non-compliance gap, which is due to the following reasons:

- The Compliance Monitoring Unit has not conducted investigations into compliance issues because there is no well-functioning mechanism for conducting comprehensive investigations promptly according to the ISO 37301:2021 standard.
- The results of investigations are not used to improve the compliance management system, as there is no specific mechanism or tool for continuous improvement of the banking operations.

#### *Second: Summary of the Operational Requirement*

**Table (6). Summary of the Operational Requirement**

No	Clauses	Weighted arithmetic mean	Percentage of Implementation and documentation	Gap%
A	8-1 Operational Planning and Control	3.8	63.33	36.67
B	8-2 Establishing Controls and Procedures	6	100	0
C	8-3 Raising Concerns	0	0	100
D	8-4 Investigation Processes	3.2	53.33	46.67
E	8- Operational	3.25	54.16	45.84

It can be observed from the results in Table 6 that the actual implementation and documentation of the (8: Operational Requirement) according to the ISO 37301:2021 standard in the studied bank was at a rate of 54.16%. The implementation and documentation score was 3.25 out of a possible 6 points, which indicates a 45.84% non-compliance gap.

#### *Chapter Four: Conclusions and Recommendations*

##### *First: Conclusions*

- The general management of the bank shows a lack of attention and knowledge regarding the core principles and concepts of the compliance management system, and it has not effectively communicated this to employees.
- There is insufficient focus by the bank's general management on educating and encouraging employees to report non-compliance with laws and regulations in a timely manner.

- The research results indicate a non-compliance gap of 45.84% between the actual operational practices and the requirements of the ISO 37301:2021 standard.
- Results from investigations are not being used to improve the compliance management system due to the absence of a defined tool or mechanism for continuous improvement of banking operations.
- The general management of the bank has failed to monitor and control planned changes and review them as much as possible, as well as to take necessary actions to mitigate their negative impacts.

### *Second: Recommendations*

- The research recommends that the bank under study adopt the ISO 37301:2021 compliance management system standard and work on reducing the gap between actual practices and the standard's requirements.
- Employees should be educated about the compliance management system through workshops and training sessions, encouraging them to report non-compliance issues promptly.
- The bank's general management should place greater emphasis on corrective actions for instances of non-compliance, to prevent recurrence and use the results from investigations to improve the compliance management system.
- The bank should adopt continuous improvement processes and tools, plan and monitor changes, and establish a strategic improvement plan, as this will bring both moral and financial benefits to the bank.

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