JEFFERSON WELLS
A Manpower Company

Sarbanes-Oxley for Non-Accelerated Filers Methodology Overview

PHASE 1
PLANNING & SCOPING

Perform Preliminary Assessment
Optional

Establish Sarbanes-Oxley Governance & Compliance Structure

Assess Entity Controls Based on 20 Principles

Scope Significant Accounts, Disclosures, Locations & Systems

Identify Financial Statement Assertions & Map to Business Processes

PHASE 2
DOCUMENTATION

Establish Documentation Methodology/Parameters

Establish Documentation Schedule

Interview Business Process Owners to Understand In-Scope Business Processes

Create Documentation

Map Identified Controls to FSA's (Key Control Identification)

Confirm Design Effectiveness of Controls

Document Control Landscape

PHASE 3
TESTING

Establish Testing Methodology/Parameters

Establish Testing Schedule

Perform Walkthroughs of Key Controls

Create Test Plans for Operational Effectiveness

Test Operational Effectiveness & Confirm Results

Document Test Results & Controls Needing Remediation

Issue Report of All Work Performed

PHASE 4
REMEDIATION & FINAL ASSESSMENT

Establish Remediation Procedures

Remediate Failed Controls

Re-test Remediated Controls

Issue Report of Remediation Activities

Evaluate Control Deficiencies & Weaknesses*

Prepare Management's Assessment of ICOFR*

External Auditor Opines on Management's Assessment & ICOFR

* Management's Responsibilities