Stated control (binder extract, last signed 3 Mar 2026)

HL-CC-PRIV-MFA-01: Privileged production access requires MFA.

Control owner: Security Operations (tbd). Frequency: quarterly sample.

Procedure: GRC requests evidence from Engineering. Engineering provides a screenshot or export showing MFA is enabled for privileged users.

Pass: screenshot or export indicates MFA enabled.

Fail: screenshot shows MFA off.

The footer still lists a former CISO. SOX mapping: “IT general controls, logical access (see RCM v4).”