

DORA / NIS2 Positioning Memo

DORA Positioning (EU 2022/2554)

- Execution Layer classified as ICT third-party supporting operational resilience.
- Fail-closed execution reduces systemic operational risk.
- Structured audit logs support incident reporting.
- No interference with payment or accounting systems.

NIS2 Positioning (EU 2022/2555)

- Supports risk management via controlled execution authority.
- Traceability for security incident investigations.
- Kill-switch enables rapid containment of automation.

Enterprise Boundary Statement

- Client remains responsible for ICT governance and compliance programs.