

Continuous Assurance for DORA Article 30 ICT Third-Party Risk

Client

The client is one of Europe's largest member-services organizations, serving millions of members through roadside assistance, mobility, travel, insurance, and emergency services. As a highly regulated enterprise operating under Europe's digital resilience framework, the organization must continuously demonstrate that its governance processes and supplier relationships meet evolving regulatory obligations — including the EU Digital Operational Resilience Act (DORA).

The Challenge

DORA Article 30 raised the bar on ICT third-party risk governance, requiring that contracts with critical ICT providers contain specific mandatory provisions — covering security responsibilities, business continuity, audit rights, subcontracting, incident reporting, data handling, termination rights, and regulatory oversight.

For the client, compliance was no longer a matter of simply locating contracts. Teams needed to confirm that every obligation under Article 30 was actually present, backed by internal governance processes, and supported by evidence.

The existing process relied on legal, procurement, risk, and compliance specialists manually reviewing contracts, supplier policies, and operational evidence — specialized, slow-to-scale work that grew harder to repeat consistently as contracts and regulations evolved. The result: operational overhead, slower supplier onboarding and reviews, and limited ability to continuously assess ICT third-party assurance.

The Konfer Approach

The client engaged Konfer to test whether agentic AI could turn DORA Article 30 assurance from a manual legal exercise into a continuous, evidence-driven process. Konfer's agents:

- Decomposed Article 30 into discrete, testable obligations
- Analyzed contracts, policies, standards, and supporting evidence in parallel
- Generated an AI-assisted recommendation on whether each obligation appeared to be satisfied, with supporting evidence and a confidence score, for legal and compliance review
- Produced audit-ready assessments for legal, procurement, risk, and governance teams

Rather than searching documents, Konfer's agents evaluated whether regulatory intent had actually been implemented and evidenced across the organization.

Implementation

The engagement structured DORA Article 30 into individual contractual and governance obligations, then ingested supplier contracts, ICT policies, procurement standards, governance procedures, and supporting operational documentation. Agents mapped each obligation to relevant contractual clauses and evidence, flagging what was fully satisfied, partially satisfied, or unsupported — surfacing missing language and governance gaps and absent evidence along the way. Every assessment included document references, rationale, and a confidence score, with legal and compliance teams able to validate or override agent recommendations while preserving a complete audit trail.

Results

Instead of manually reviewing the relevant contracts and policies, the client's compliance specialists received an obligation-by-obligation Article 30 assessment, direct links to supporting clauses and evidence, and a clear picture of missing contractual provisions and controls — all explainable and ready for legal validation. Because the process is repeatable, it can be rerun whenever regulations, contracts, or policies change, establishing a foundation for continuous ICT third-party assurance rather than periodic compliance exercises.

Key Advantages

- Automated verification of DORA Article 30 contractual obligations against enterprise documentation
- Faster ICT third-party assurance assessments with substantially less manual effort
- Explainable regulatory reasoning backed by complete evidence traceability
- Continuous assurance that keeps pace as contracts, suppliers, and regulations evolve