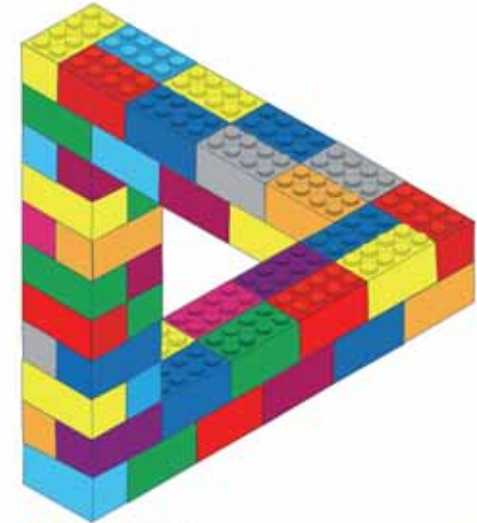


MITRE's System of Trust: Supply Chain Assessment Synergy Consistency and Evidence-Based

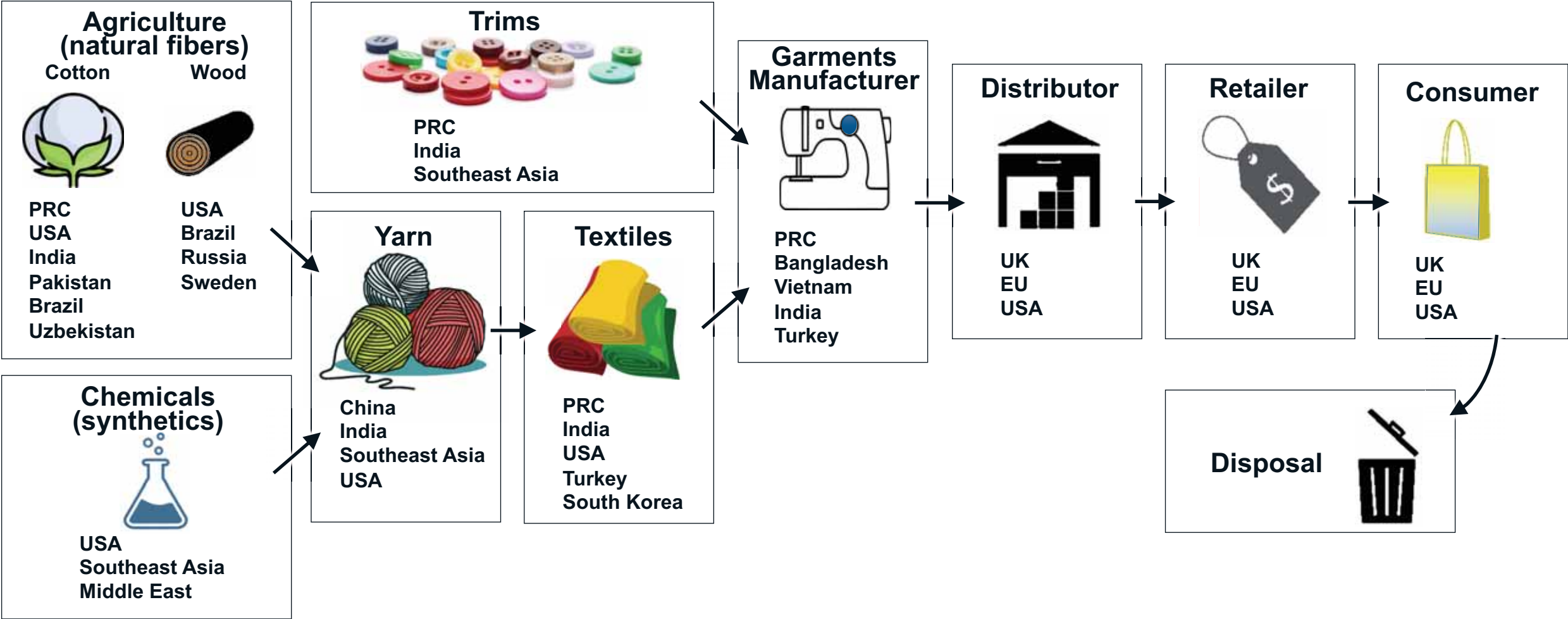


MITRE | System of Trust™

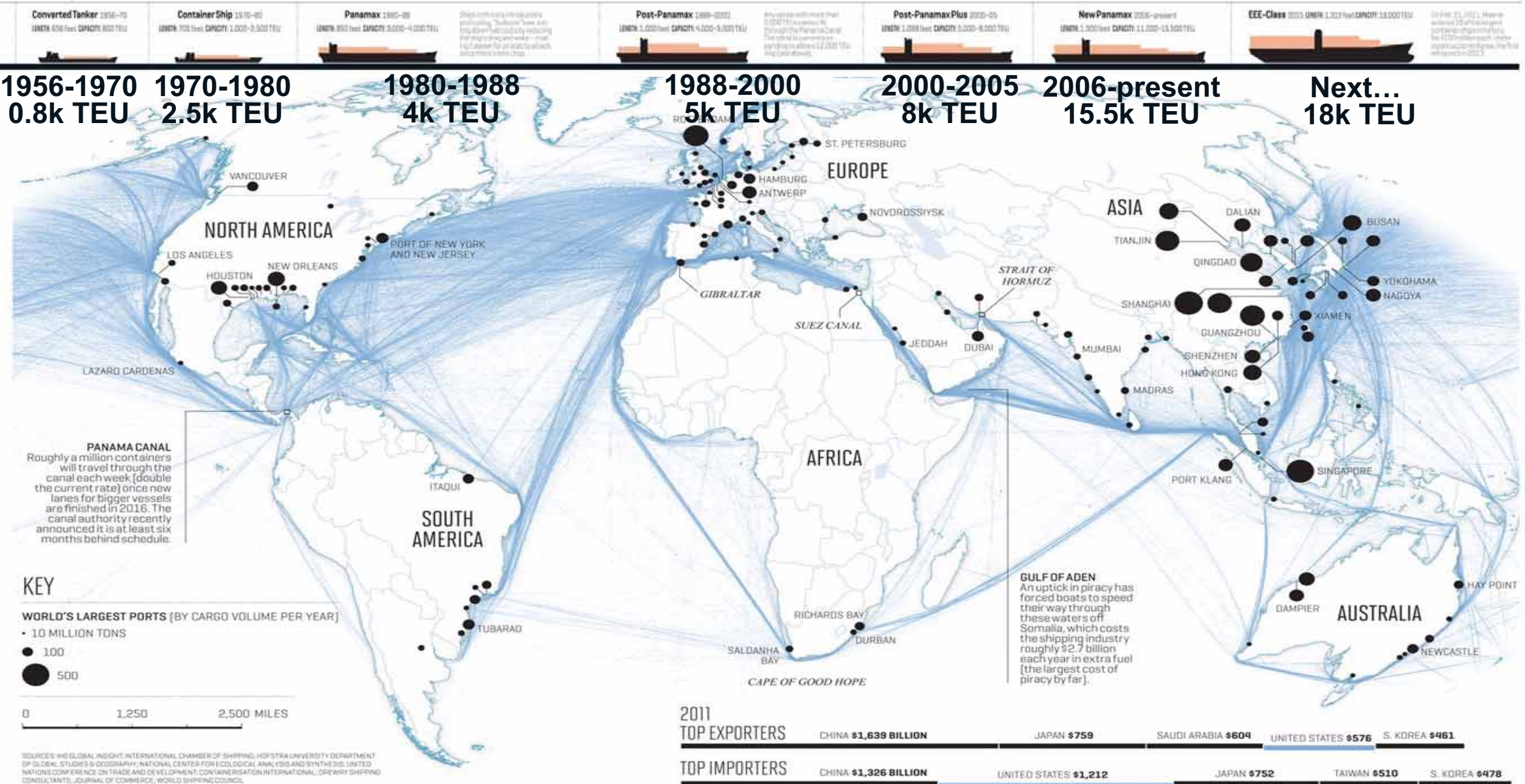
Robert Martin
Sr. Software and Supply Chain Assurance Prin. Eng.
Cross Cutting Solutions and Innovation Dept.
Cyber Solutions Innovation Center
MITRE Labs

MITRE | SOLVING PROBLEMS
FOR A SAFER WORLD™

Supply Chain Example – Consumer Clothing



https://imgs.mongabay.com/wp-content/uploads/sites/20/2020/04/23100736/FF_Supplychain.png



Supply Chains

Generic Supply Chain

Materials



Design



Production



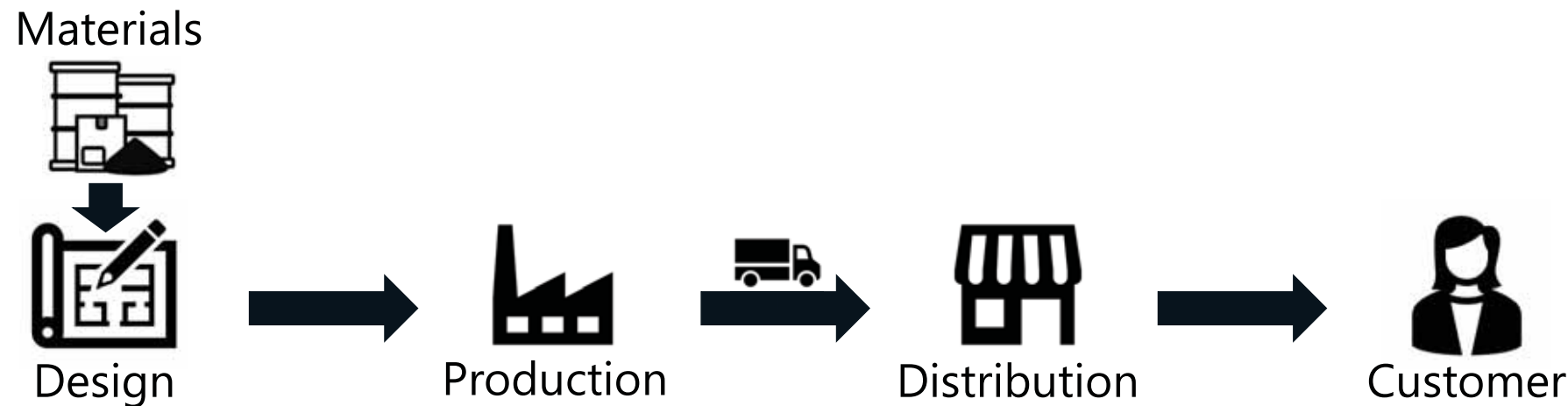
Distribution



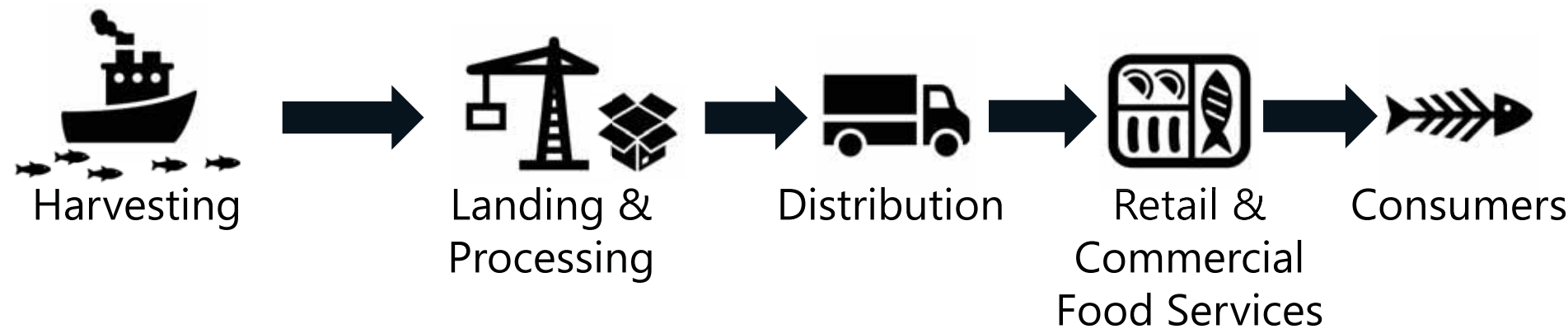
Customer

Supply Chains

Generic Supply Chain

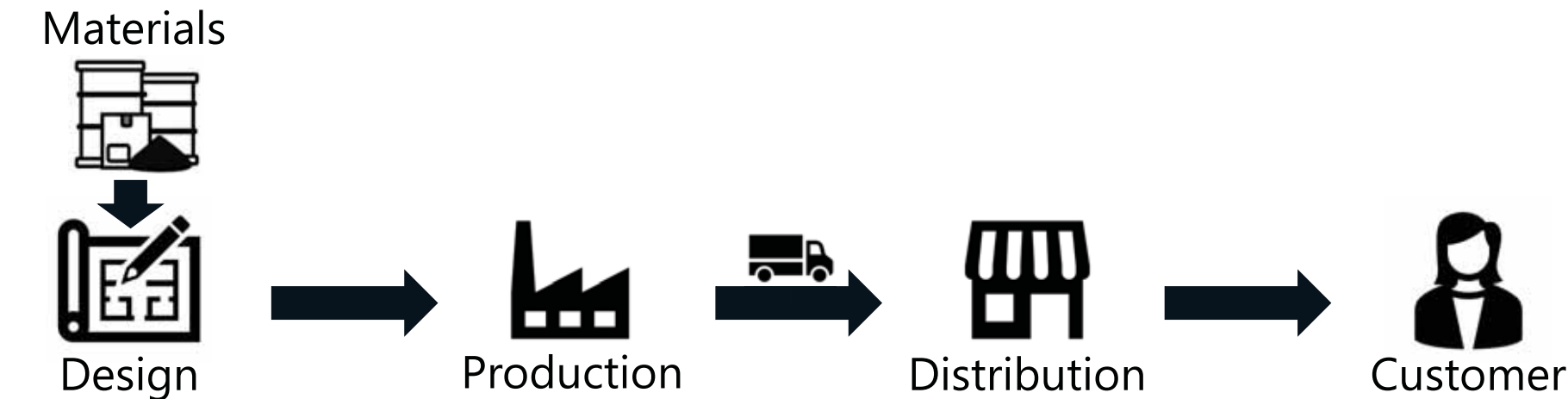


Seafood Supply Chain

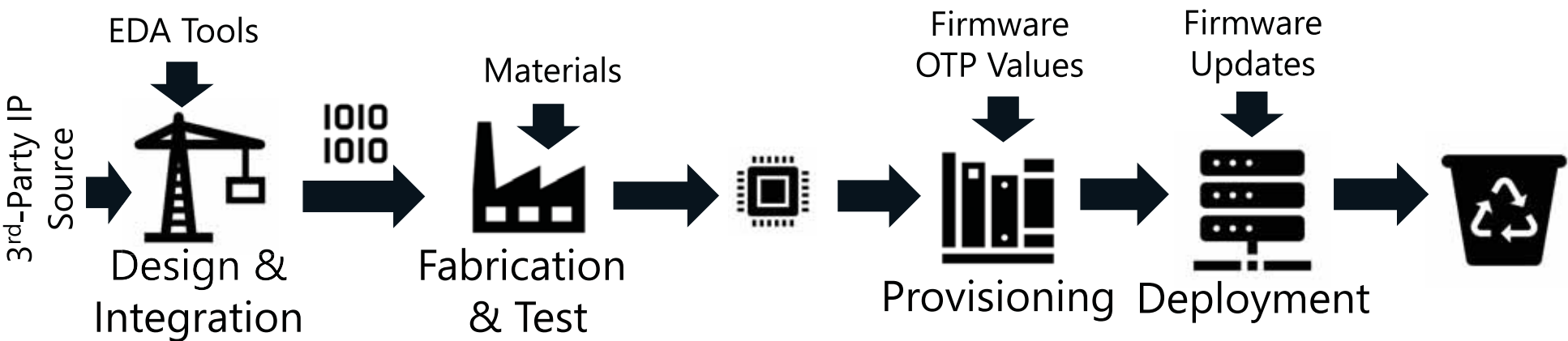


Supply Chains

Generic Supply Chain

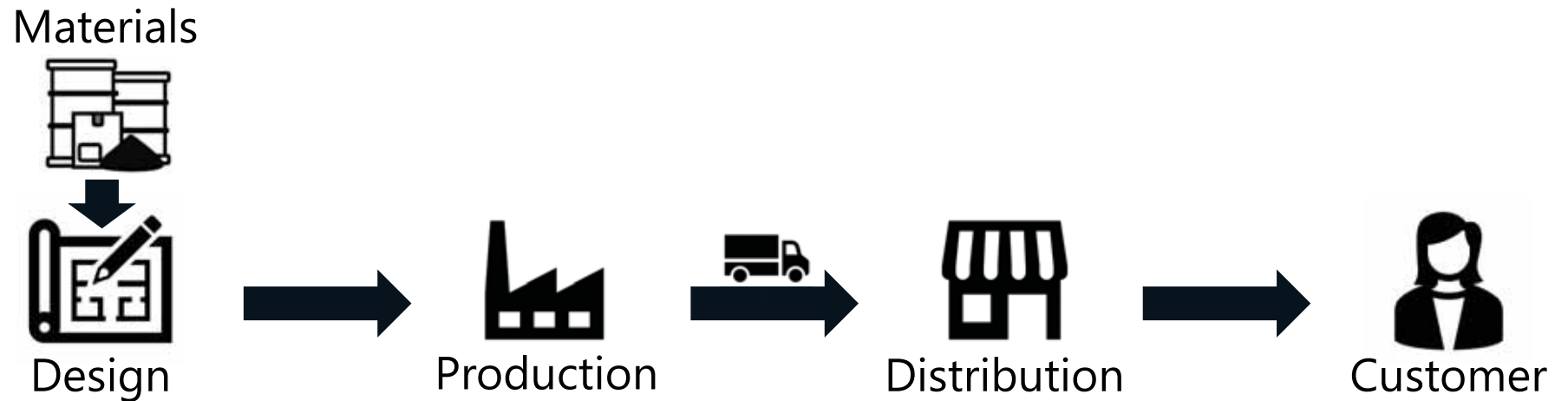


Micro-electronics Supply Chain

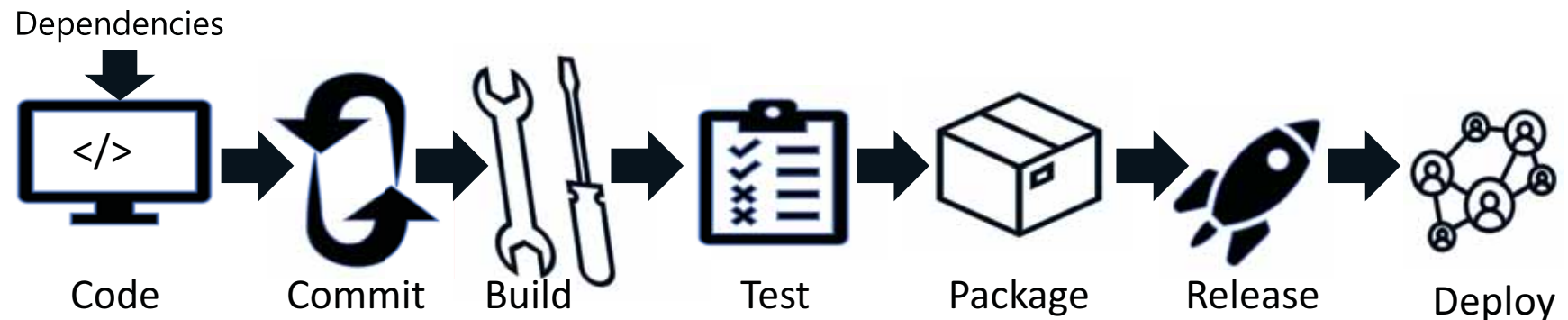


Supply Chains

Generic Supply Chain

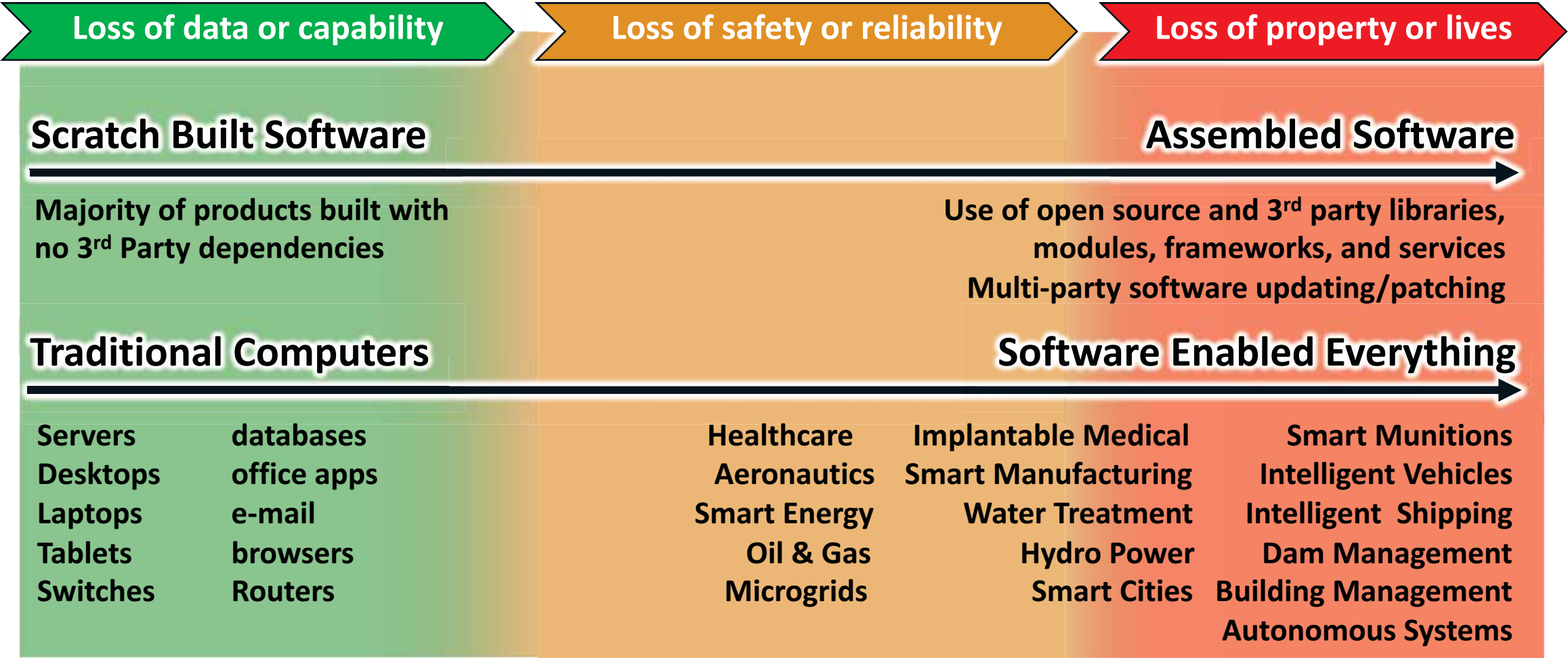


Software Supply Chain



Software is Ubiquitous, Assembled, and Critical

IT Risk **Operational Risk**



Software Enabled Critical Infrastructure and Mission Capabilities...

Medical



Buildings



Aeronautics



Manufacturing



Energy



Shipping

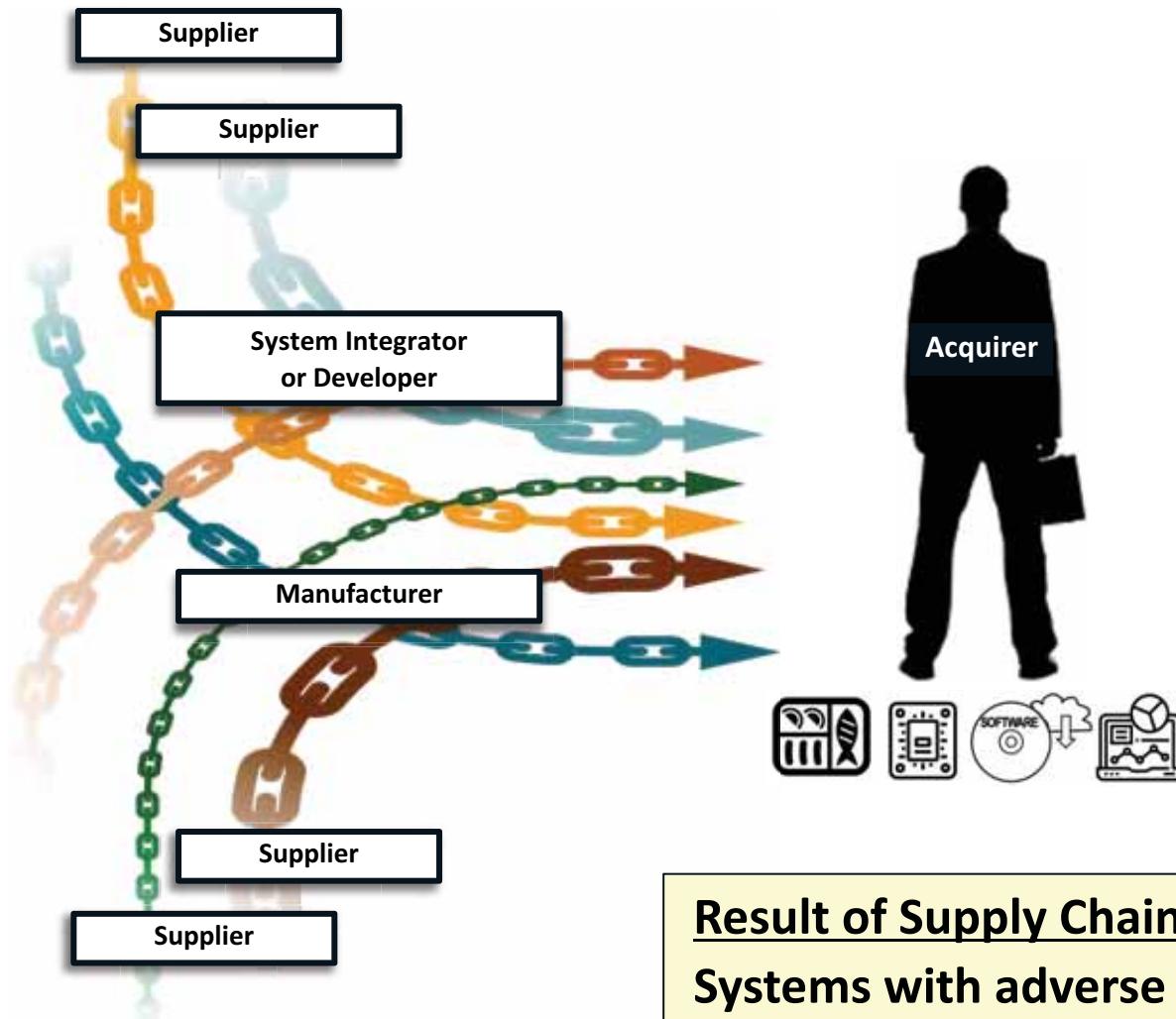


Vehicles



Whether for Fish, Chips, or Software

Supply Chain Trustworthiness: Intentional and Unintentional Acts



Based on SEI/CMU materials

Intentional acts

- Counterfeit products
- Disruption, hijacking, theft, civil unrest,...
- Malicious taint or insertion

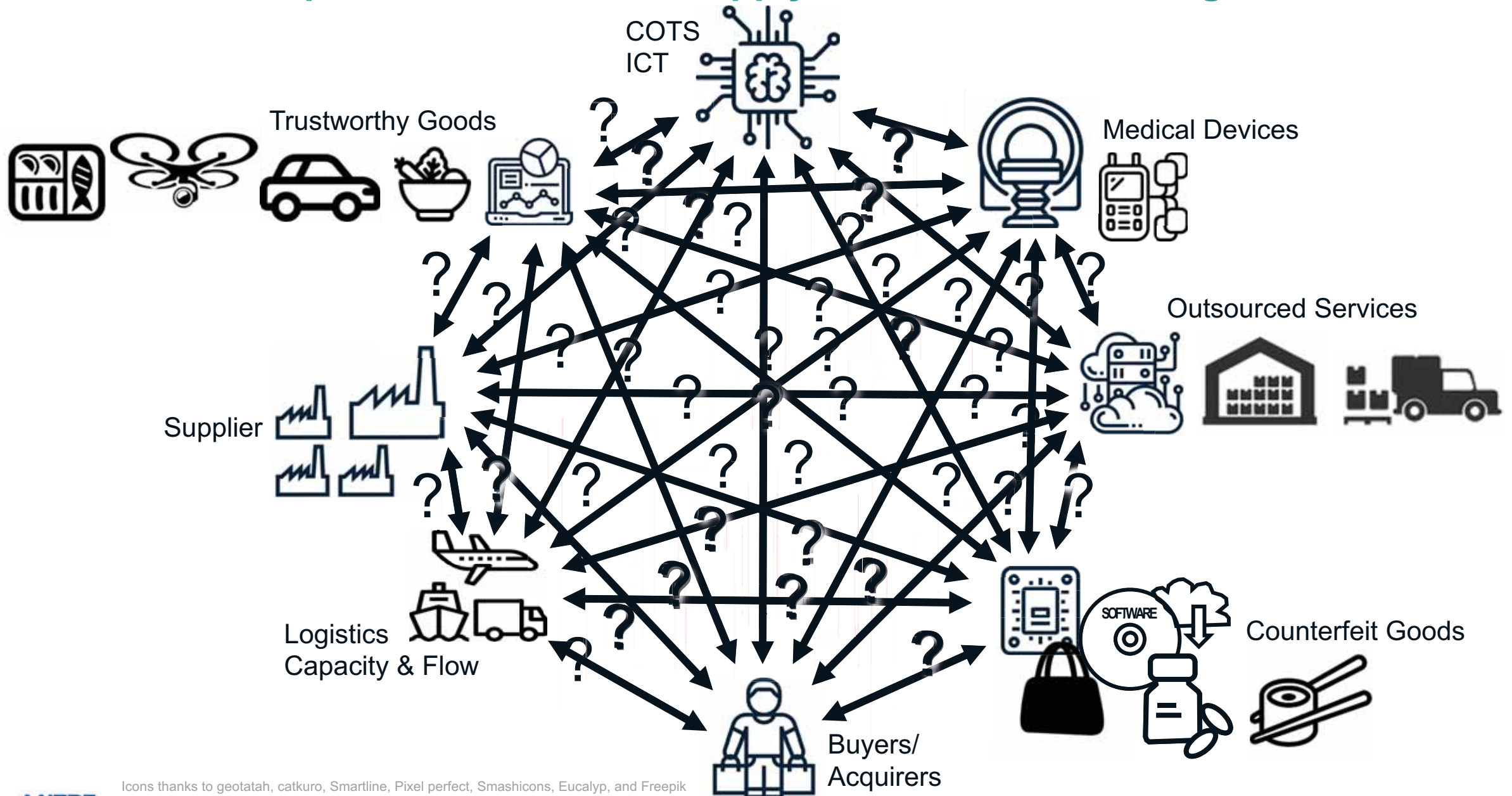
Unintentional acts

- Poor quality/tainted goods/shortages/weather disruptions
- Vulnerable software/hardware inserted unintentionally (components/modules w/weaknesses and/or known vulnerabilities)

Result of Supply Chain Attacks:

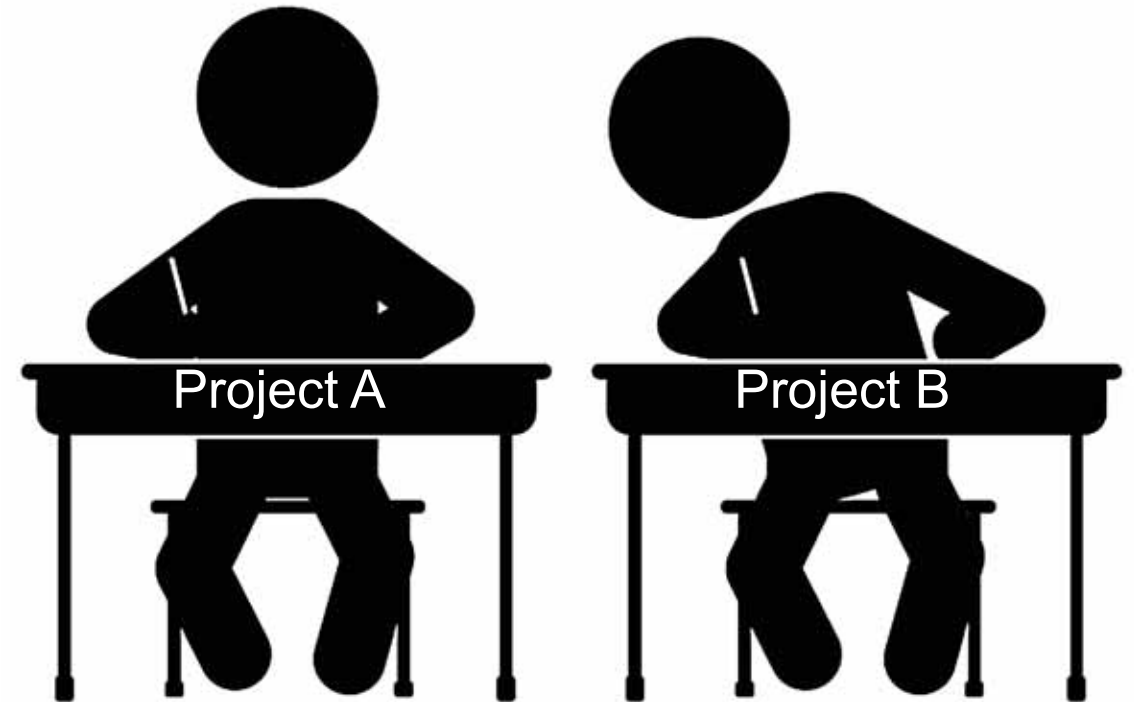
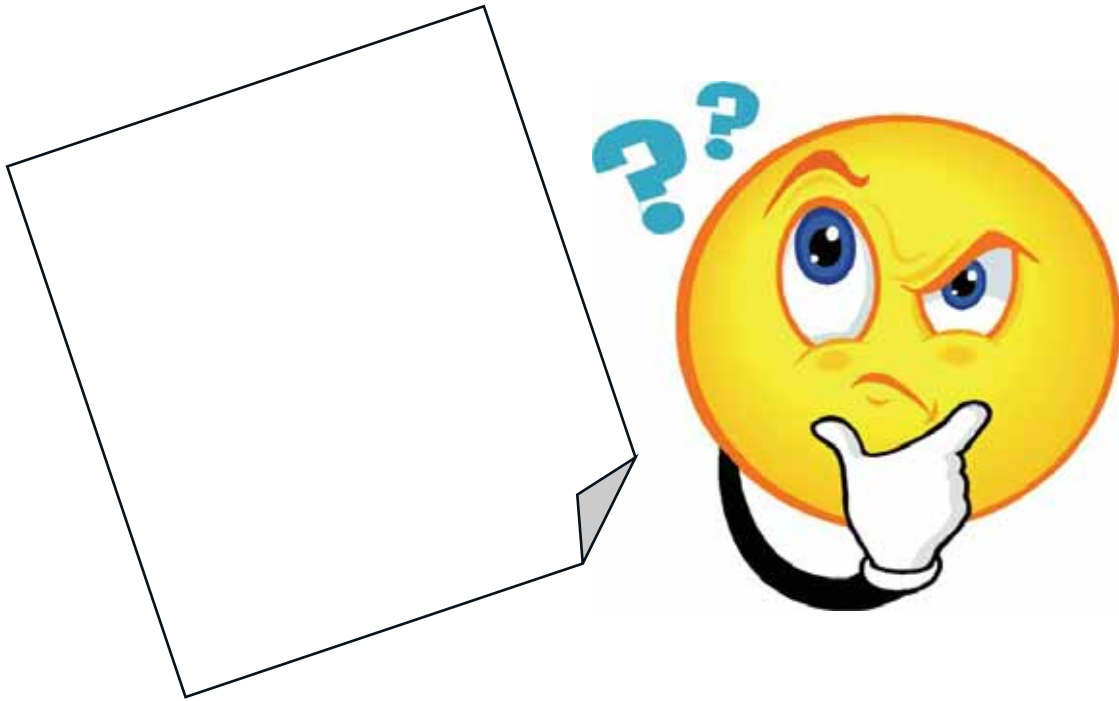
Systems with adverse behaviors including functional degradation, data exfiltration, espionage, adversarial control and disruption.

Open Question: What Supply Chain Risks to Manage?



Icons thanks to geotatah, catkuro, Smartline, Pixel perfect, Smashicons, Eucalyp, and Freepik

Open Question: What Supply Chain Risks to Manage?



Supply Chain Risk Areas

Quality Culture of the Supplier

Natural Disasters and Hazards



Icons thanks to freepik

Floods
Avalanche
Drought
Winds
Heavy Rains
Pandemics
Earthquake
Volcanoes
Tornadoes
Forest Fires
Snow
Thunderstorms
Tsunamis

External Influences of the Supplier

3RD PARTY
RISK
MANAGEMENT

Financial Stability of the Supplier

Organizational Stature of the Supplier

Susceptibility of the Supplier

Maliciousness of the Supplier
Organizational Security

Attackers & Counterfeits

Human Hazards



Hijacking



Corporate Corruption



Traffic Congestion



Civil Disruption



Interdependent
Supply Chains

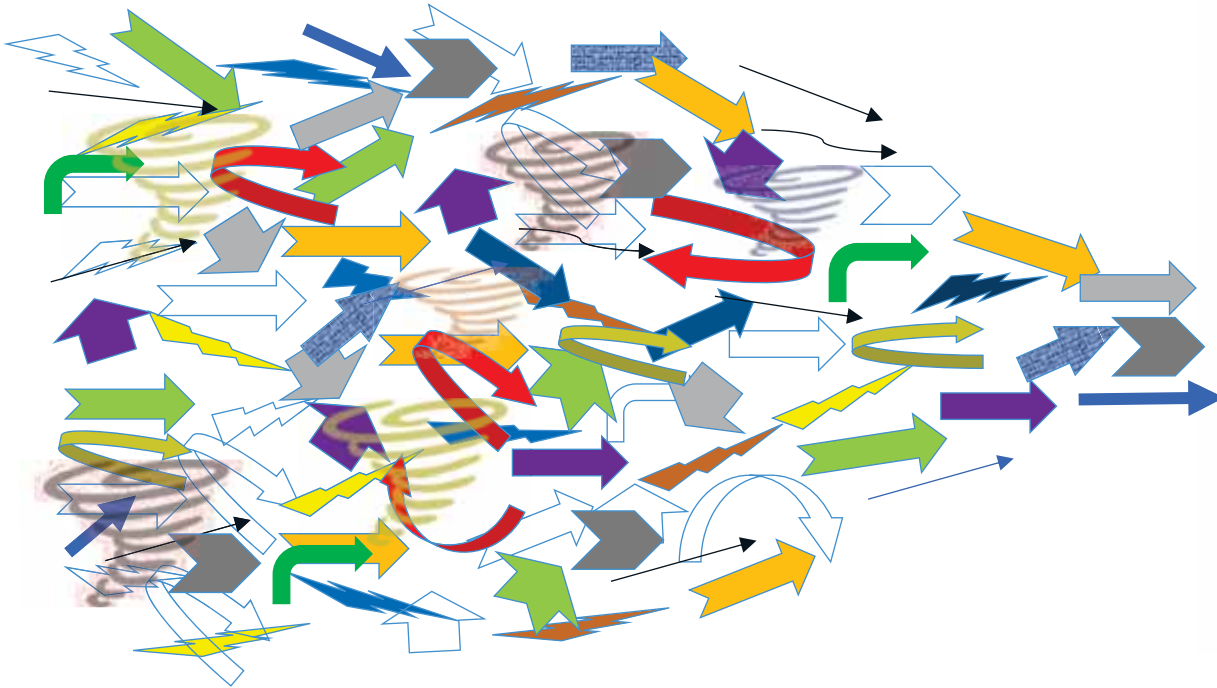


National Corruption

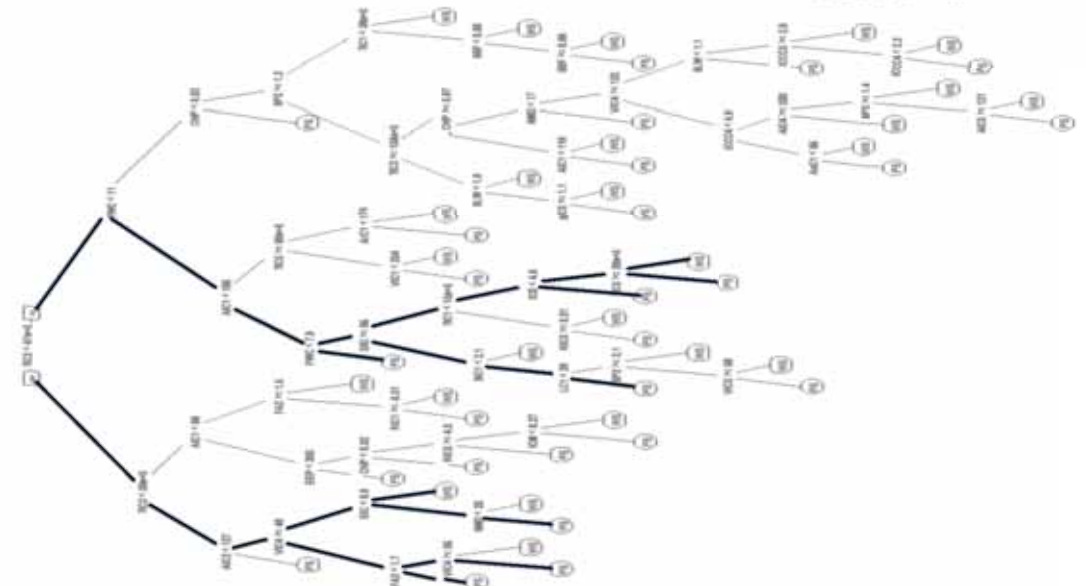
Supply Chain Security (SCS) System of Trust (SoT)

“What Supply Chain Risks to Manage?”

SoT - a strategic, widely-adoptable, holistic, data-driven analysis platform to assess supply chain security risks

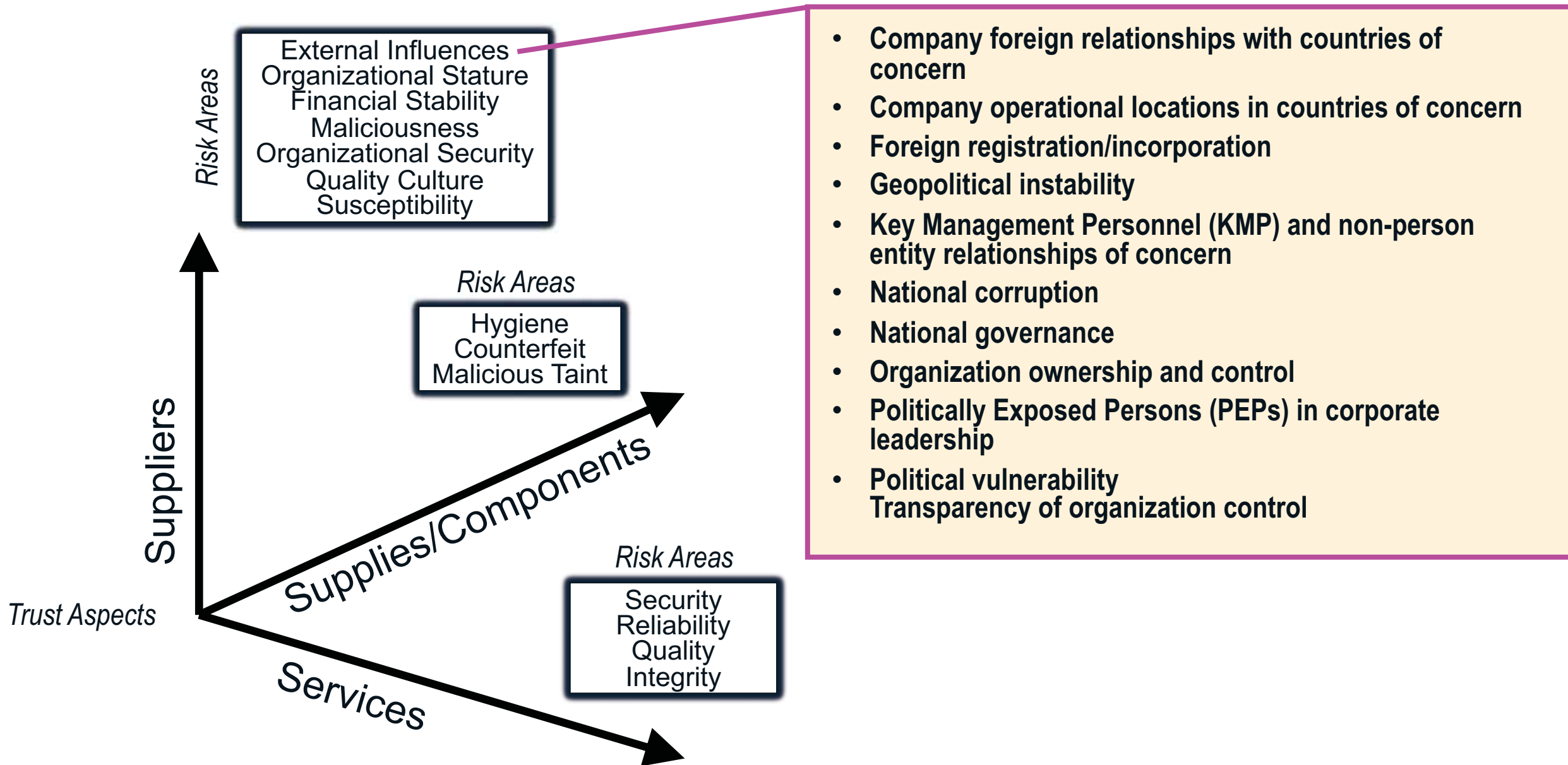


Address Chaos, Align & Organize

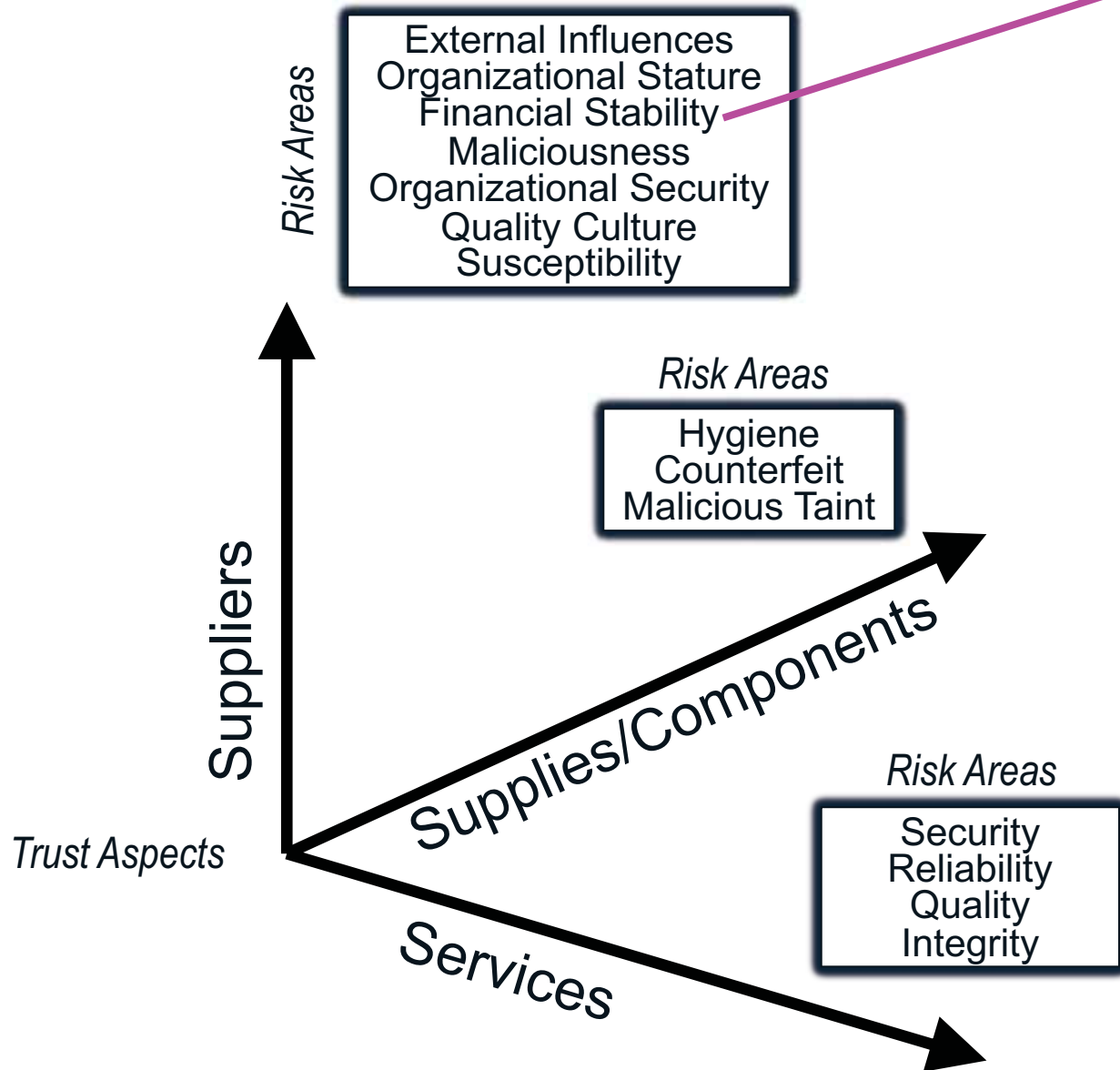


Simplify, Tailor & Use

Basis of Trust

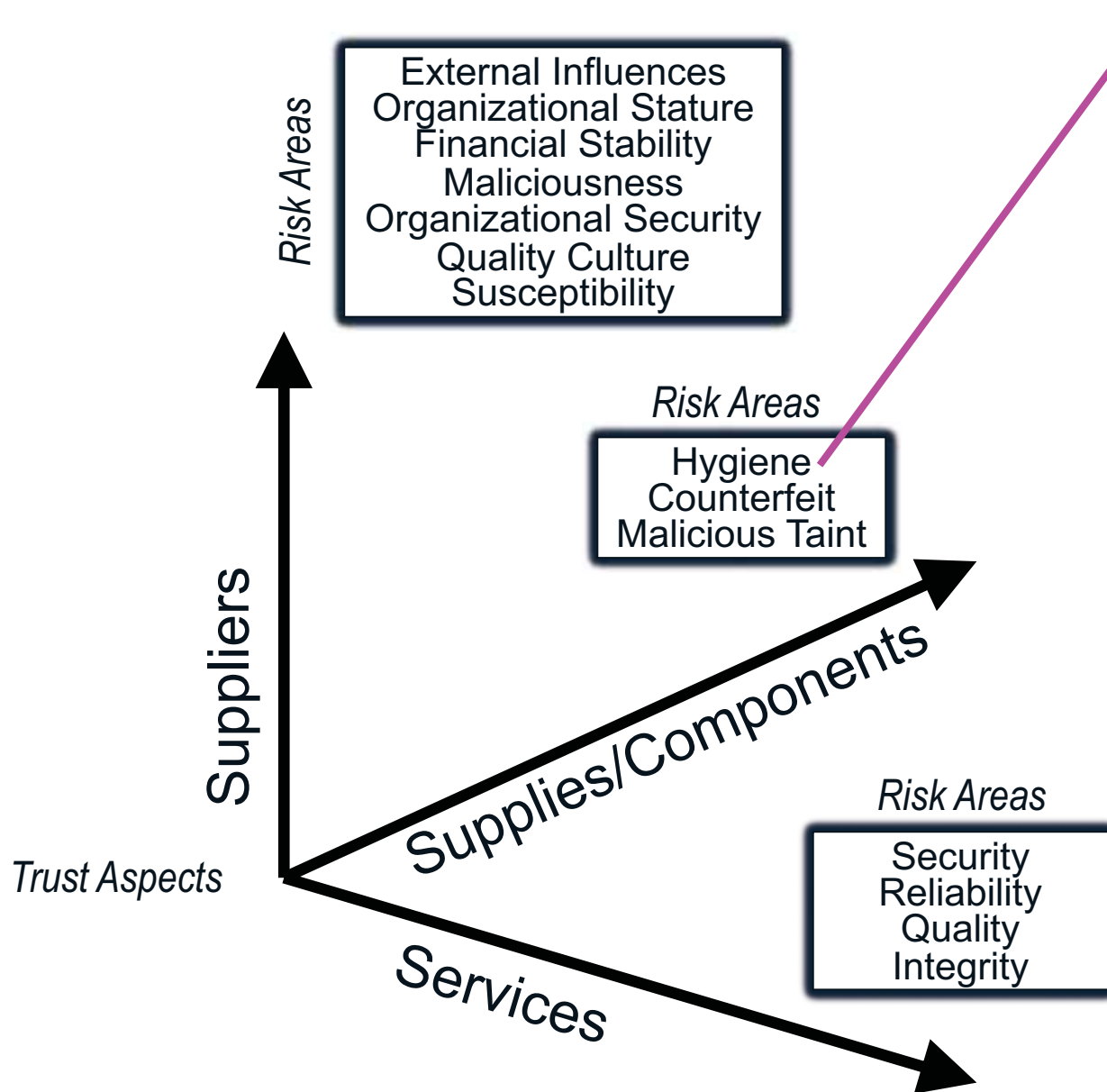


Basis of Trust



- **Questionable debt management**
 - Organization has concerning level of liquidity and cash flow
 - Organization has concerning ability to pay its debts based on level of debt, assets and equity
- **Questionable financial stewardship**
 - Organization has history of bankruptcy or liens
 - Organization has history of being target of lawsuits
 - Organization has history of explicit findings/ratings of financial instability due to stewardship issue
 - Organization has history of late payments
 - Organization has history of SEC (or foreign counterpart) investigations
 - Organization lack of currency in public filings
- **Questionable future outlook**
 - Company has concerning R&D investment level
 - Organization has concerning inventory turnover rate
- **Questionable profitability**
 - Gross profit margin is of concern
 - Organization is not showing a profit
- **Vulnerability of financial stability to foreign influence**
 - ...
- **Vulnerability of financial stability to market factors**
 - ...
- **Vulnerability to takeover**
 - ...

Basis of Trust



• Product Quality

- ICT Hardware Product Quality
- Product Quality Requirements
- Software Product Quality
 - Software Anomaly Control
 - Software Consistency
 - Software Design Simplicity
 - Software Provenance & Pedigree
 - ...

• Product Resilience

- ICT Hardware Product Resilience
- Software Product Resilience

• Product Security

- ICT Hardware Product Security
- Inadequate protection for controlled unclassified information
- Information on product manufacturer information systems not backed up regularly
- Misconfigured access controls on product manufacturer information systems
- Sensitive information in digital form not encrypted while in physical transit either to or from product manufacturer
- Users of product manufacturer information systems do not receive cybersecurity training
- Weak identification and authentication controls on product manufacturer information systems
- ...

MITRE Supply Chain Security System of Trust Risk Areas* **

Supply Chain Risks													
Supplier Risks							Supply Risks			Services Risks			
External Influences	Financial Stability	Organizational Stature	Susceptibility	Quality Culture	Maliciousness	Organizational Security	Hygiene	Malicious Taint	Counterfeit	Integrity of Service Delivered	Quality of Service Delivered	Reliability of Service Delivered	Security of Service Delivered
Company foreign relationships with countries of concern	Questionable debt management	Corporate ownership reputation	Customers	Company has a low CMMI rating	Foreign Intelligence Service (FIS) influence	Concerns regarding facility access	Product quality	Facilities integrity	Copycat manufacturing	Service infrastructure pedigree	Service infrastructure pedigree	Service infrastructure pedigree	Service infrastructure pedigree
Company operational locations in countries of concern	Questionable financial stewardship	Diversity and inclusion	Industry sector	Internal company QC, SCRM policy & practice	Fraud and corruption	Concerns regarding software access	Product resilience	Functional integrity	Mislabeling	Service Infrastructure provenance	Service infrastructure provenance	Service infrastructure provenance	Service infrastructure provenance
Foreign registration/incorporation	Questionable future outlook	Geographic concentration	Location	Subcontractor supply chain health / risk	Legal/law issues	Concerns regarding hardware access	Product security	Geopolitical integrity	Packaging integrity	Service specific integrity	Service specific quality	Service specific reliability	Service specific security
Geopolitical instability	Questionable profitability	Mergers & acquisitions frequency	Personnel	Technical susceptibility	Sanction list status	Cyber threat activity	Logistics / transportation integrity	Technical authenticity	Manufacturing process integrity	Susceptibility to manipulation of service infrastructure via physical access/touch			Susceptibility to manipulation of service infrastructure via physical access/touch
Key Management Personnel (KMP) and non-person entity relationships of concern	Vulnerability of financial stability to foreign influence	Natural disasters				Data security status		Unsanctioned manufacturing					Susceptibility to manipulation of service infrastructure via remote/virtual access/touch
National corruption	Vulnerability of financial stability to market factors	Operational volatility				Type/ level /frequency of security training							
National governance	Vulnerability to takeover	Sustainability				Vulnerabilities							
Organization ownership and control													
Politically Exposed Person (PEPs) in corporate leadership													
Political vulnerability													
Transparency of organization control													

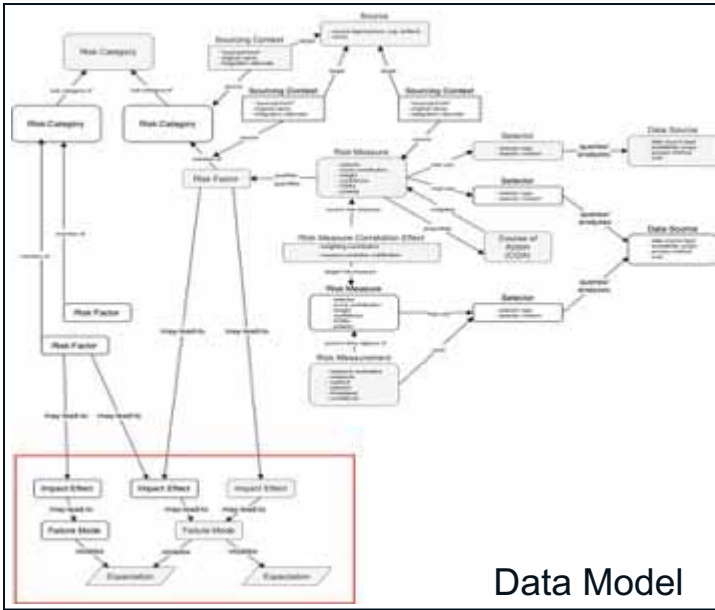
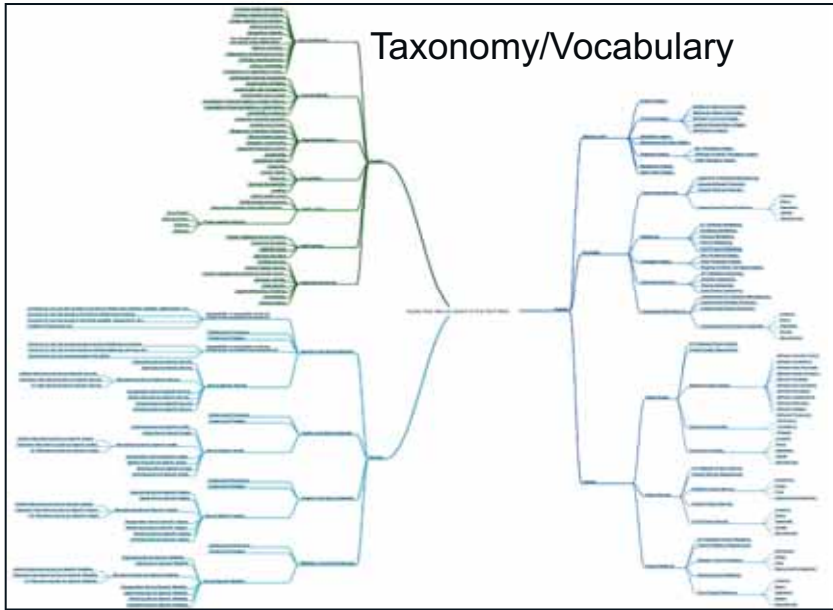


MITRE | System of Trust™

MITRE's Supply Chain Security System of Trust™
<https://www.mitre.org/publications/technical-papers/trusting-our-supply-chains-a-comprehensive-data-driven-approach>

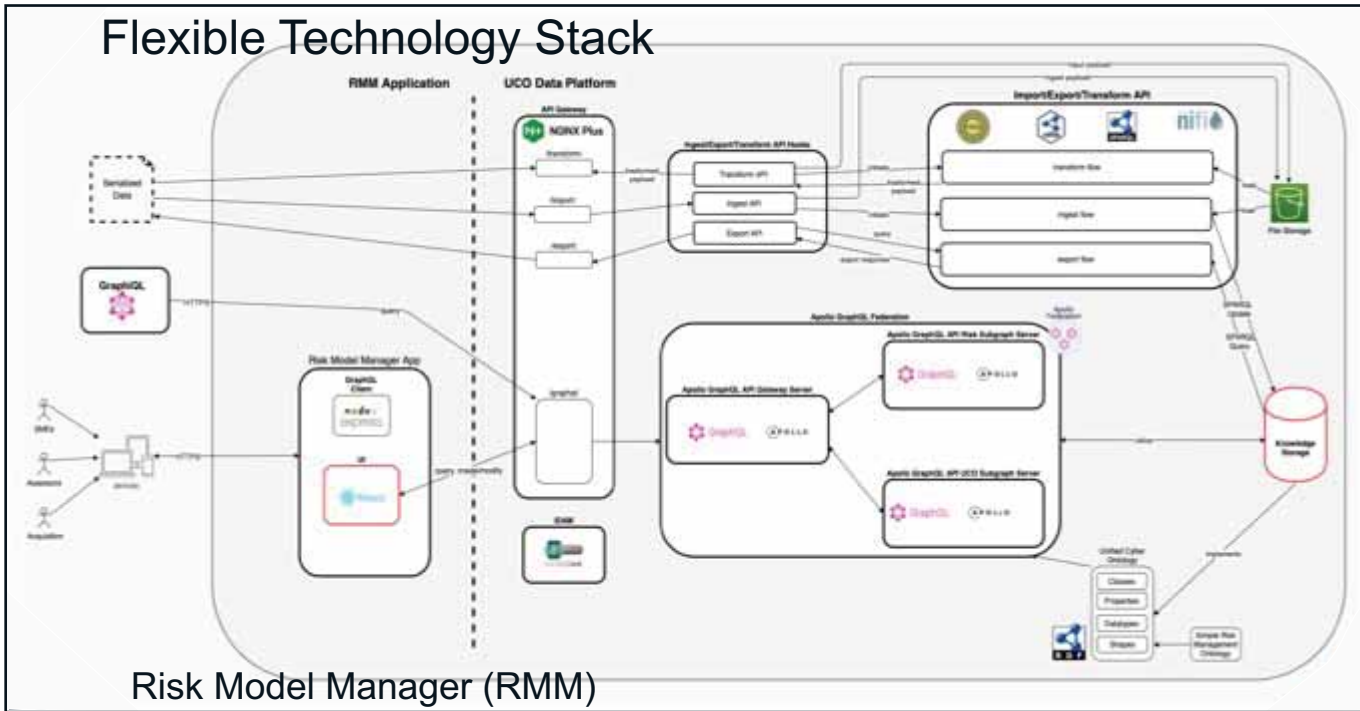
* Supply Chain Security Top 75 Risk Areas Levels 1-4

** System of Trust Expanding to Pharma, Food, and other types of Products



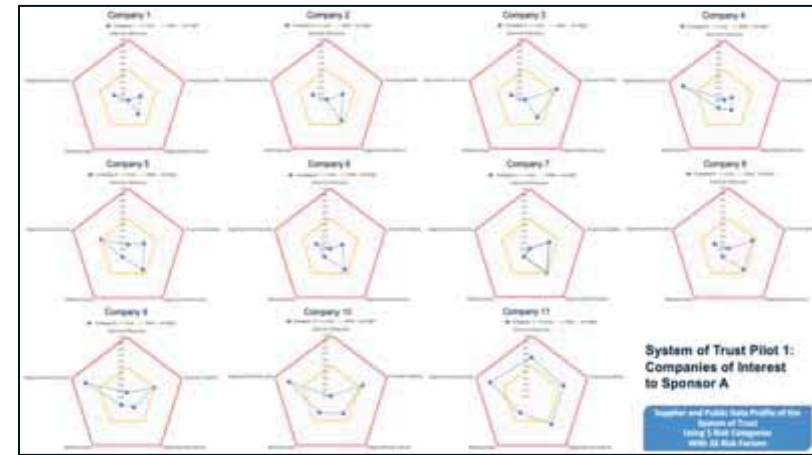
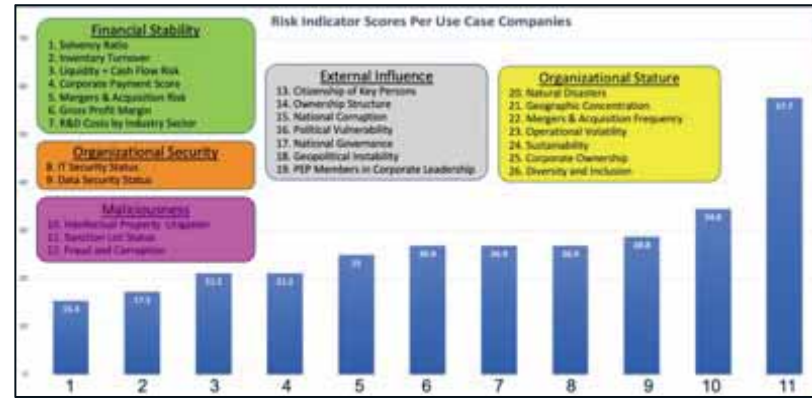
Analytic Methods

Security Risk	Risk Category	Sub Factor & Score	Risk Measure	Score	Maximum Possible Score	Total Score	Risk Factor Score	No Threshold
Software Vulnerability	Software Vulnerability	Software Vulnerability	Software Vulnerability	10	10	10	10	10
		Software Vulnerability	Software Vulnerability	10	10	10	10	10
		Software Vulnerability	Software Vulnerability	10	10	10	10	10
		Software Vulnerability	Software Vulnerability	10	10	10	10	10
		Software Vulnerability	Software Vulnerability	10	10	10	10	10
		Software Vulnerability	Software Vulnerability	10	10	10	10	10
		Software Vulnerability	Software Vulnerability	10	10	10	10	10
		Software Vulnerability	Software Vulnerability	10	10	10	10	10
		Software Vulnerability	Software Vulnerability	10	10	10	10	10
		Software Vulnerability	Software Vulnerability	10	10	10	10	10



Piloting
11, 3, 1, 6,
22, 12, ...

Export to Spreadsheet for "Offline" Assessment



Tying together SoT and RMM

SoT Profiling [optional screen]

Type of Acquisition Issues

- ☐ COTS ICT
- ☒ Trustworthy SW/HW
- ☒ Supplier
- ☐ High Value & High Unit cost COTS
- ☐ Outsourced Services
- ☐ Counterfeit ICT HW/SW

Assessing Organization

- ☒ US Federal Government
- ☐ US Military
- ☐ State/Local
- ☐ Tribal
- ☐ US Critical Infrastructure
- ☐ US DHS
- ☐ Commercial
- ☐ Small Business

Assessment Scope, Skills & Means

- ☒ Open Source Information
- ☒ Purchased Data Sources
- ☐ Written Questions
- ☐ Oral Discussions
- ☐ Sampling of Components
- ☒ Software Analysis
- ☐ Intelligence Service Investigation

Assessment Constraints

- ☒ Time Period
 - ☐ Weeks
 - ☐ Days
 - ☐ Hours
- ☐ Monies for Data Purchase
- ☒ Investigative Staff Available

SoT Profiling [optional screen]

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Assessing Organization

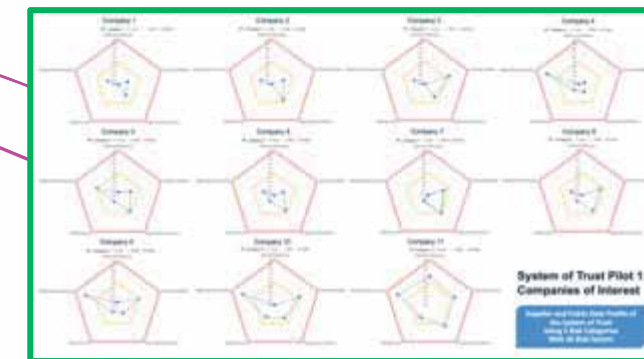
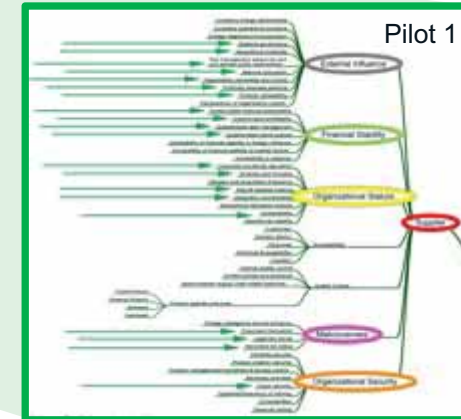
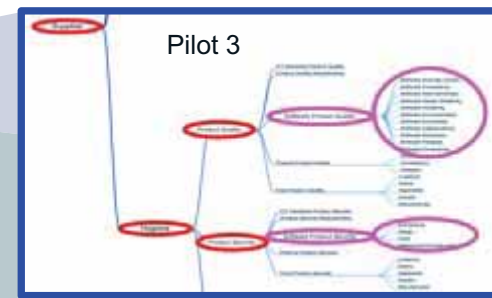
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- ☐ US Critical Infrastructure
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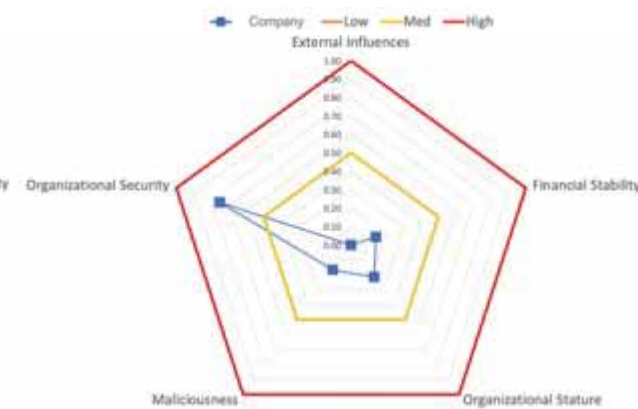
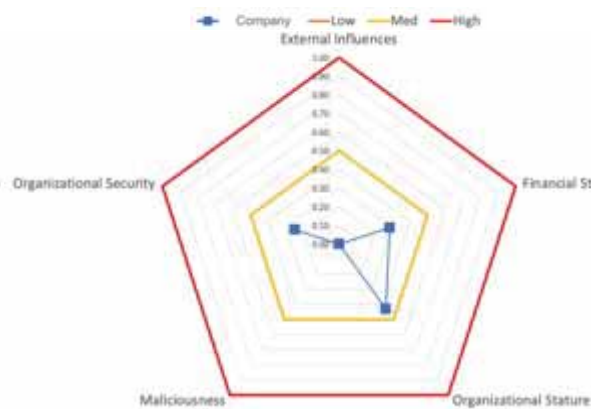
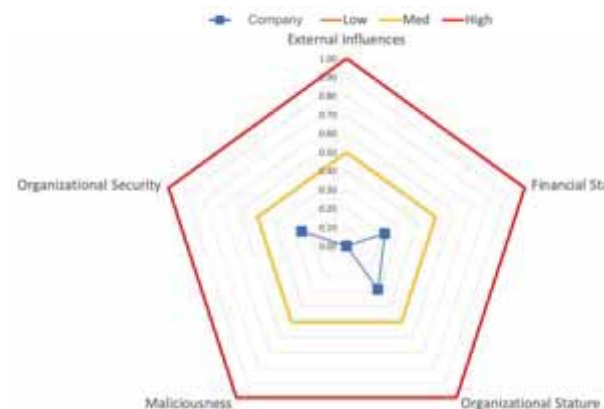


Company 1

Company 2

Company 3

Company 4

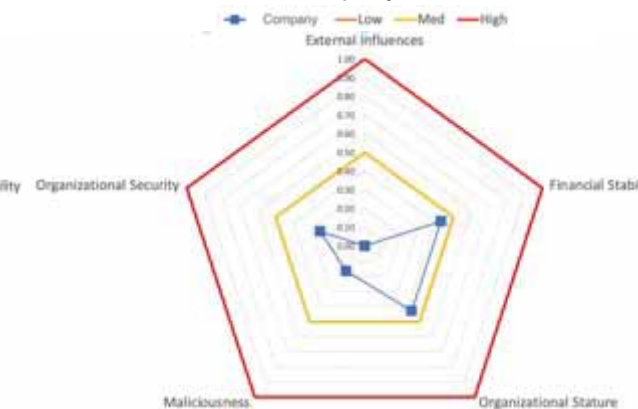
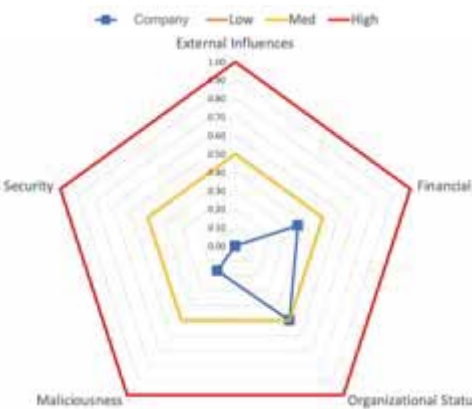
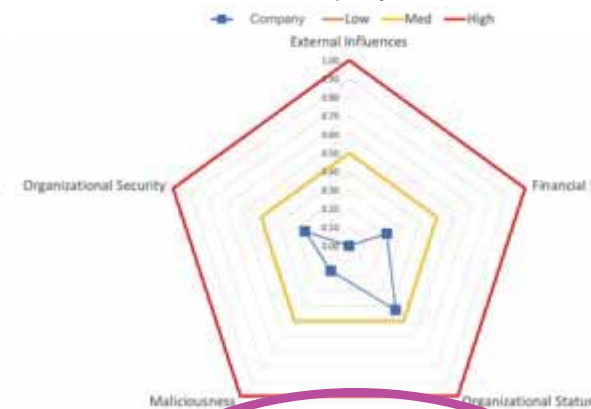
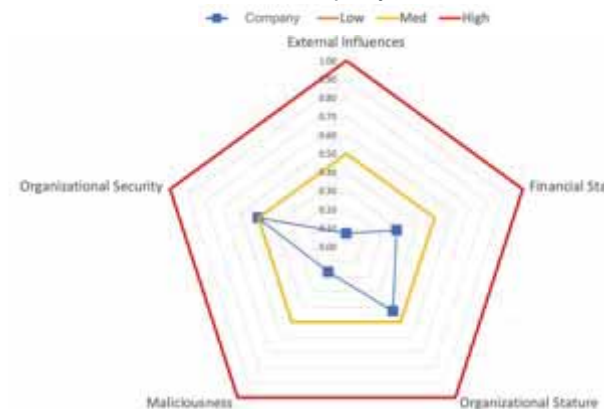


Company 5

Company 6

Company 7

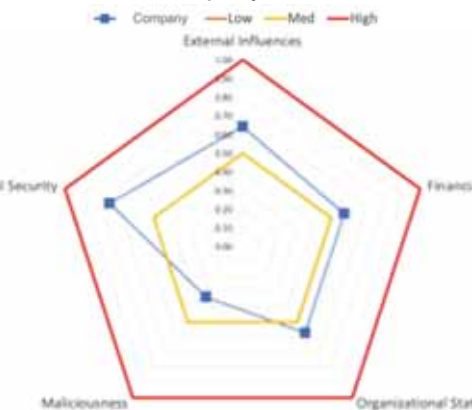
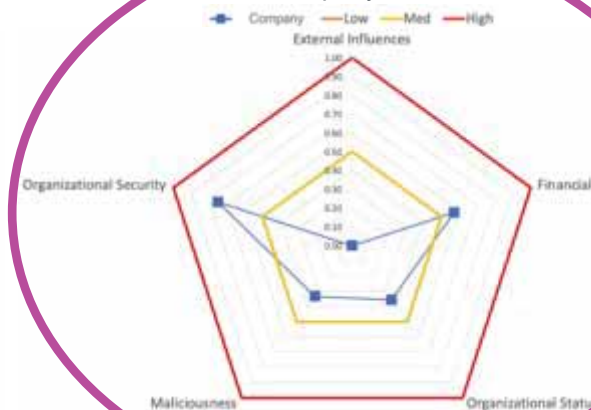
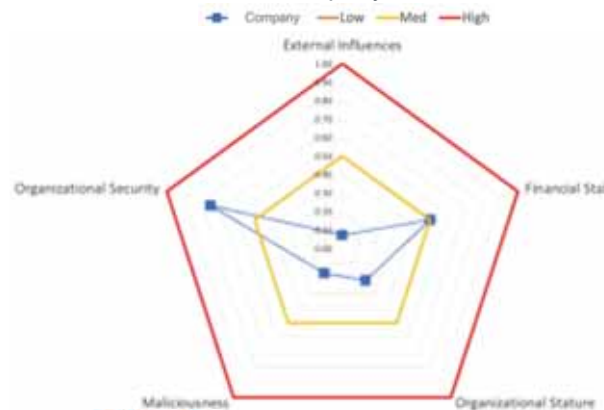
Company 8



Company 9

Company 10

Company 11



Applying

System of Trust Pilot 1: Companies of Interest

Supplier and Public Data Profile of
the System of Trust
Using 5 Risk Categories
With 26 Risk Factors

Company 10

Company Low Med High

External Influences

1.00

0.90

0.80

0.70

0.60

0.50

0.40

0.30

0.20

0.10

0.00

Organizational Security

Financial Stability

Maliciousness

Organizational Stature

Pilots 1, 2, 4 & 5

Supplier and Public Data Profile of the
System of Trust
Using 5 Risk Categories
With 26 Risk Factors

- 13. Citizenship of Key Persons
- 14. Ownership Structure
- 15. National Corruption
- 16. Political Vulnerability
- 17. National Governance
- 18. Geopolitical Instability
- 19. PEP Members in Corporate Leadership



- 1. Solvency Ratio
- 2. Inventory Turnover
- 3. Liquidity + Cash Flow Risk
- 4. Corporate Payment Score
- 5. Mergers & Acquisition Risk
- 6. Gross Profit Margin
- 7. R&D Costs by Industry Sector



- 8. IT Security Status
- 9. Data Security Status



- 10. Intellectual Property Litigation
- 11. Sanction List Status
- 12. Fraud and Corruption



- 20. Natural Disasters
- 21. Geographic Concentration
- 22. Mergers & Acquisition Frequency
- 23. Operational Volatility
- 24. Sustainability
- 25. Corporate Ownership
- 26. Diversity and Inclusion



Building up Sources of Insight about Supply Chain Risks

Risk Model Manager

ramartin

ExportViewEditTailorAssessments

Selectors

Sort By: by Name

Name

SL-7 General research

SL-15 Manual BIS (Department of Commerce) search

SL-11 Manual Bloomberg search

SL-13 Manual Edgar search

SL-23 Manual ERAI search

SL-22 Manual GIDEP search

SL-25 Manual IAPP (Department of State) search

SL-8 Manual LexisNexis search

SL-16 Manual OFAC (Department of Treasury) search

SL-9 Manual Orbis - Current Directors and Managers search

SL-9 Manual Orbis search

SL-26 Manual Privacy Rights Clearinghouse Data Breach List search

SL-14 Manual SAM.gov search

SL-10 Manual Thomson Reuters Refinitiv Company Datasets search

SL-24 Manual Wikipedia data breach list search

SL-20 Manual World Risk Report search

Risk Model Manager

ramartin

ExportViewEditTailorAssessments

Data Sources

Sort By: by Name

Name

DS-14 Bloomberg Datasets

DS-17 Bureau of Industry and Security (Department of Commerce)

Association International (ERAI)

Exchange Program

Details

Name: SAM.gov

Description: empty

Status: draft

Type: Website

Location: https://sam.gov/content/home

Availability: Public

Scope: empty

Access Method: Manual; API

Risk Model Manager

ramartin

ExportViewEditTailorAssessments

Active Assessment

Name: Demo Assessment1

Contributors: jdoe

Objective: empty

Scope: empty

Target: empty

Profile: "SoT Pilot - Supplier Quick Check" (as of 2022-02-28T19:24:05.018Z)

Last updated: 2022-03-04T21:44:09.692Z

Description: empty

Tags: empty

Progress: 84 risk measures in this profile: unanswered: 81 yes: 2 no: 1 151 other entries in this profile. Score: 70 to 100 (70 to 100)

Edit Assessment Metadata

Assessment Item

Score

Does this company have key stakeholder nationality of >= 15% from country/ies of concern? 0 to 75

Organization acquisition by or merger with stakeholders from a foreign nation 0 to 85

Has the company recently been acquired, restructured, merged, or acquired by stakeholders from a non-adversary nation? 0 to 60

Has the company recently been acquired, restructured, merged, or acquired by stakeholders from an adversary nation? 0 to 85

Has the company recently taken steps to be acquired, 0 to 85

Potential Selectors for this Risk Measure

Name: Manual Bloomberg search Type: manual query

Description: Manual search entry and results review on Bloomberg

Data Source: Bloomberg Datasets

Execution Vector: empty

Name: General research Type: manual query

Description: Human assessor conducts open research

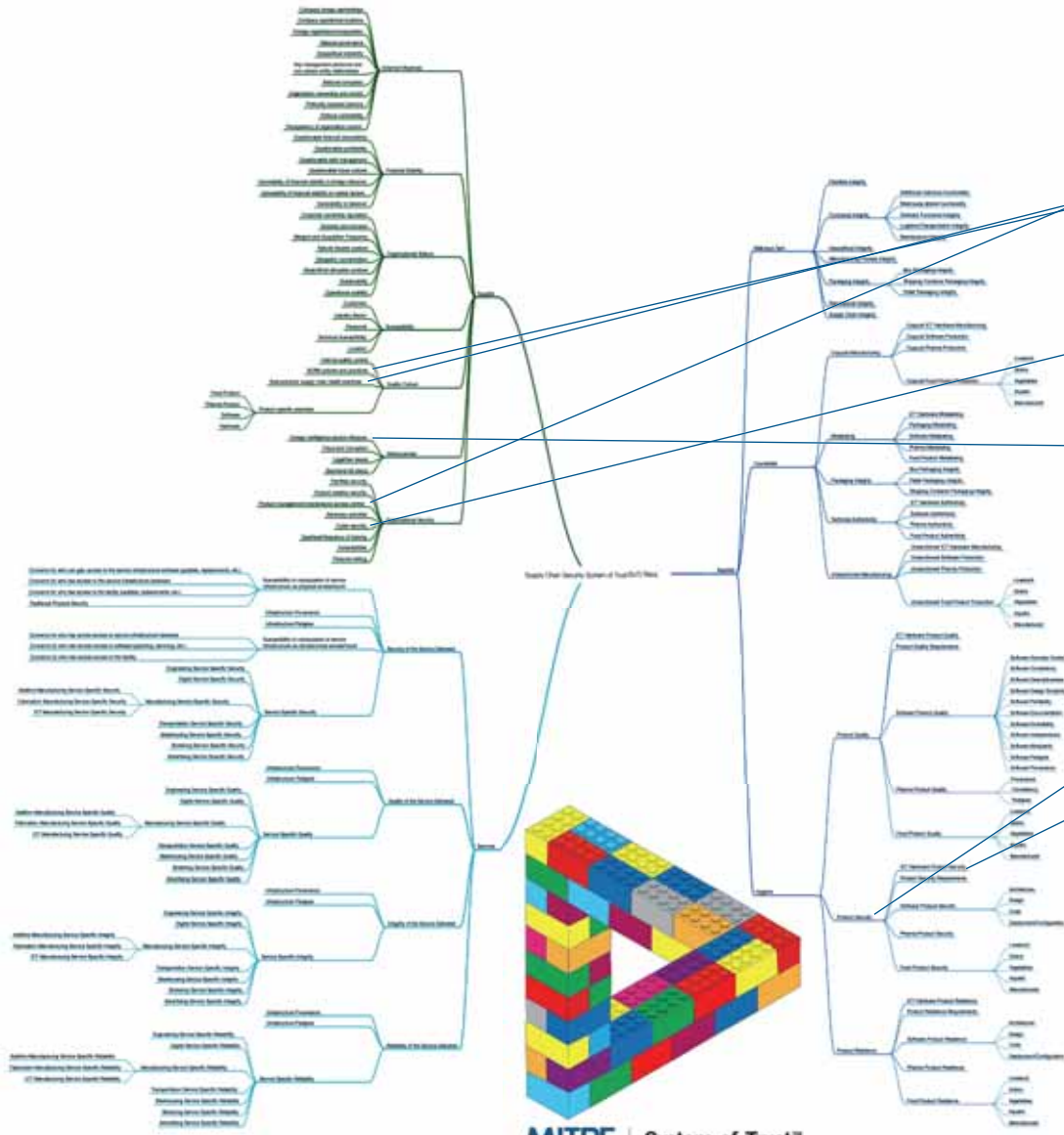
Data Source: Undefined

Execution Vector: empty

Measurements made as part of this assessment

Add a measurement by clicking the "Use" button next to a selector above

Mapping SoT Risks to Assessment Information Sources / Standards

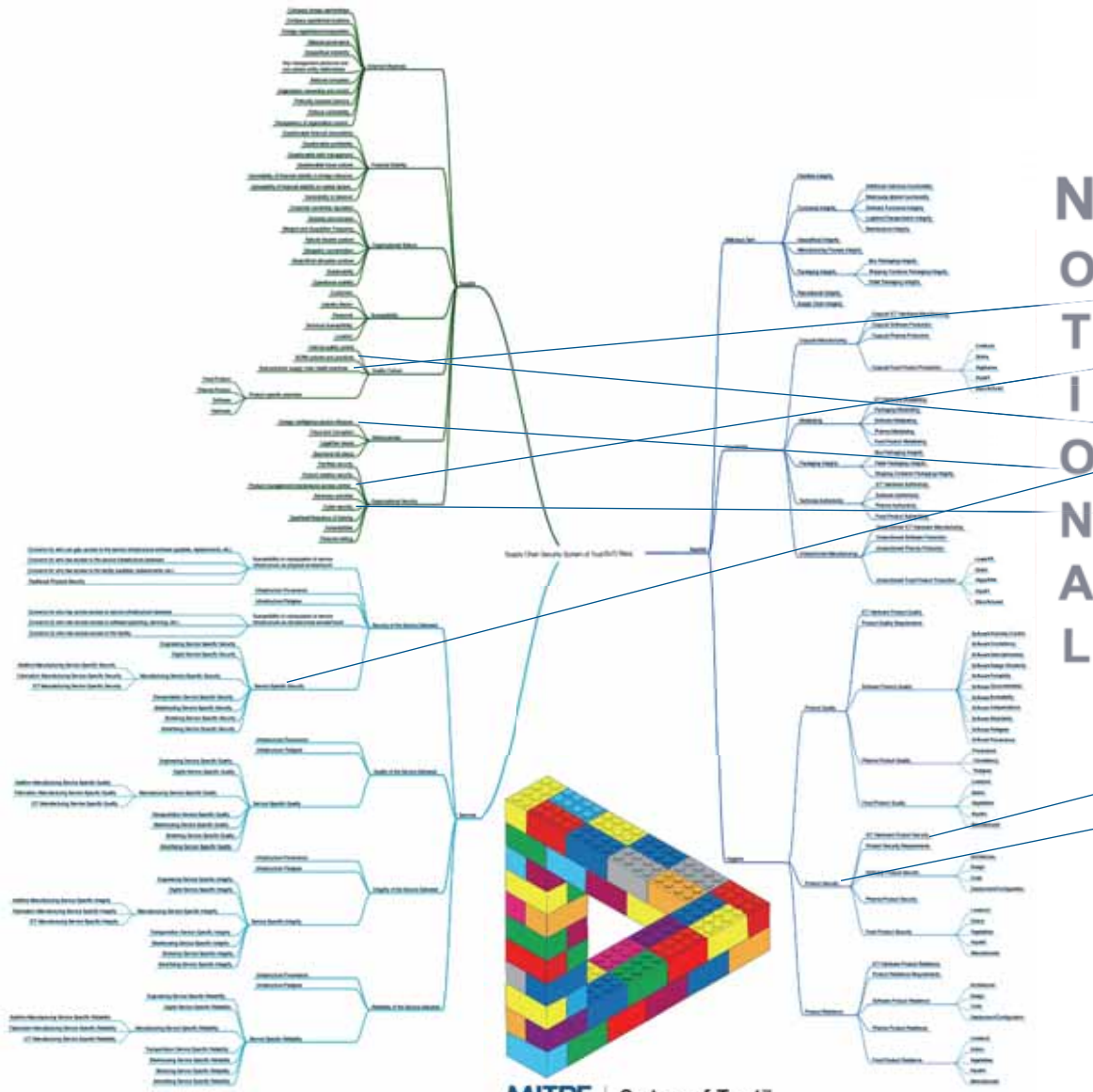


NOTIONAL

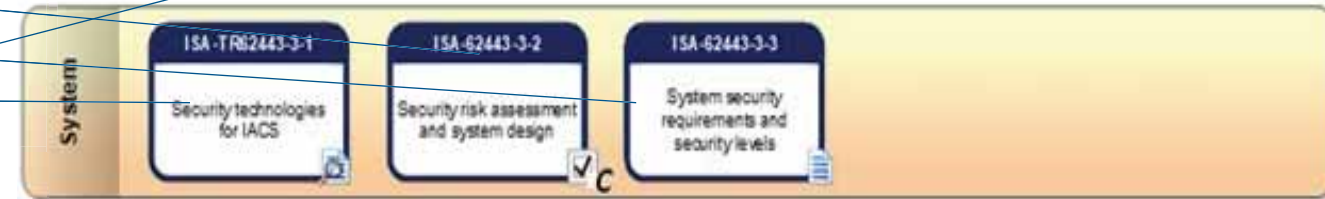
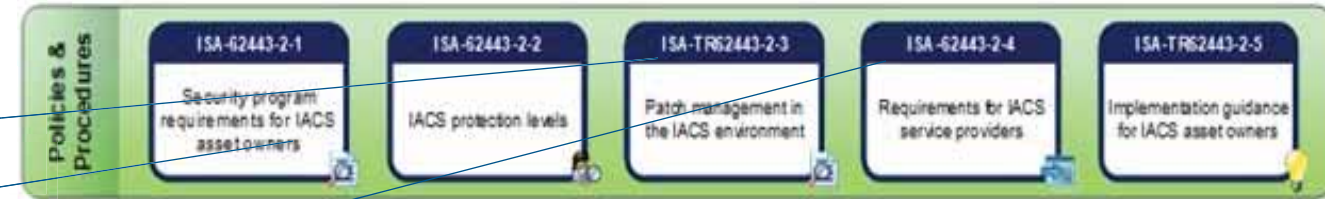


Mapping SoT Risks to Assessment Information Sources / Standards

ISA/IEC 62443

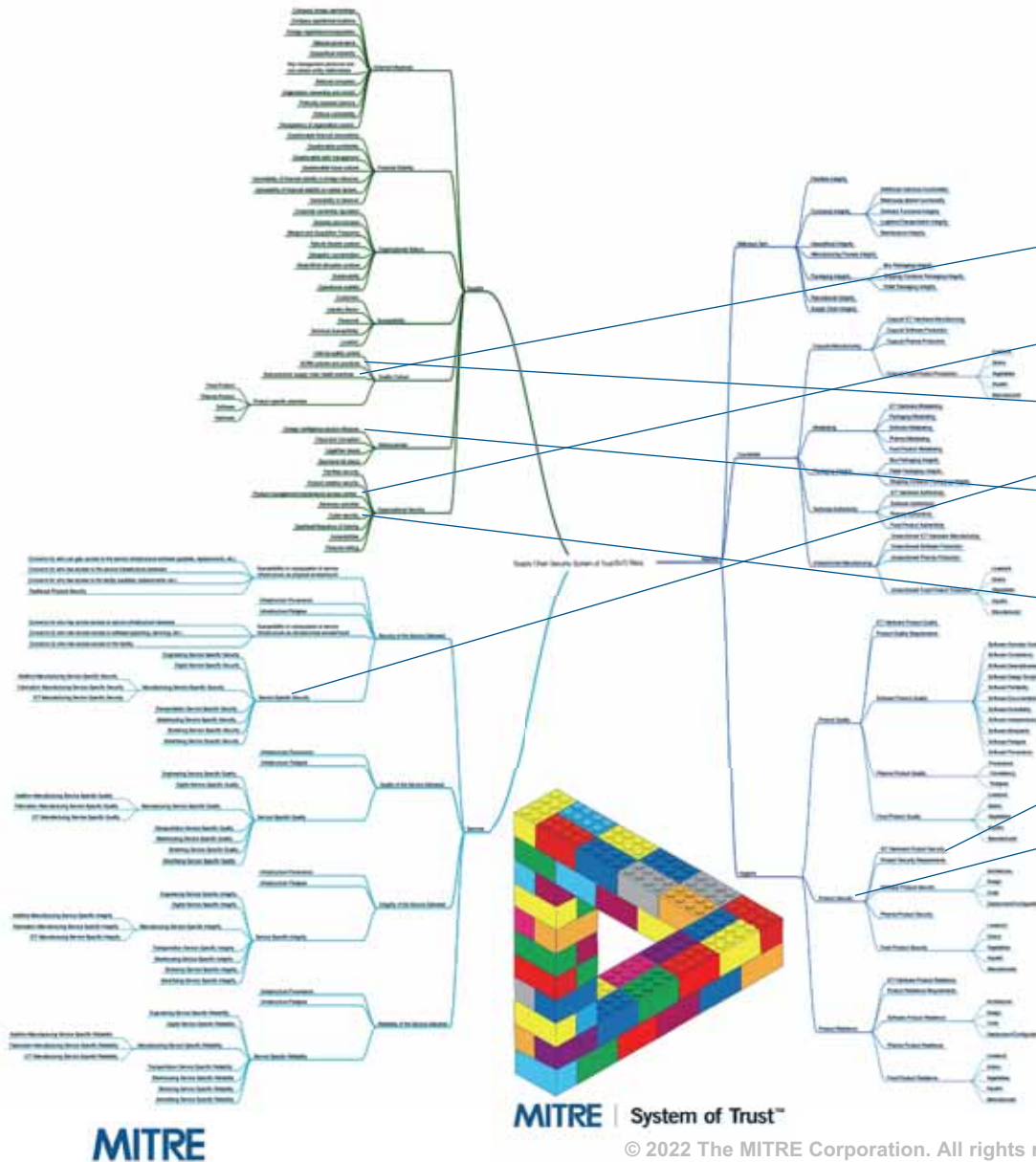


NOTIONAL



Mapping SoT Risks to Assessment Information Sources / Standards

ISO/IEC 20243



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4	O-TTPS – Requirements for Addressing the Risks of Tainted and Counterfeit Products.....	15
4.1	Technology Development.....	16
4.1.1	PD: Product Development/Engineering Method.....	16
4.1.1.1	PD_DES: Software/Firmware/Device Design Process.....	
4.1.1.2	PD_CFM: Configuration Management.....	
4.1.1.3	PD_MPP: Well-defined Development/Engineering Methods and Practices.....	
4.1.1.4	PD_QAT: Quality and Test Management.....	
4.1.1.5	PD_PSM: Product Sustainment.....	
4.1.2	SE: Secure Development/Engineering Method.....	
4.1.2.1	SE_TAM: Threat Analysis and Mitigation.....	
4.1.2.2	SE_RTP: Run-time Protection and Detection.....	
4.1.2.3	SE_VAR: Vulnerability Analysis and Response.....	
4.1.2.4	SE_PPR: Product Patching and Remediation.....	
4.1.2.5	SE_SEP: Secure Engineering Process.....	
4.1.2.6	SE_MTL: Monitor and Assess Changes in the Threat Landscape.....	
4.2	Supply Chain Security.....	
4.2.1	SC: Supply Chain Security.....	
4.2.1.1	SC_RSM: Risk Management.....	
4.2.1.2	SC_PHS: Physical Security.....	
4.2.1.3	SC_ACC: Access Controls.....	
4.2.1.4	SC_ESS: Employee and Supplier and Integrity.....	
4.2.1.5	SC_BPS: Business Partner Security.....	
4.2.1.6	SC_STR: Supply Chain Security.....	
4.2.1.7	SC_ISS: Information Systems Security.....	
4.2.1.8	SC_TTC: Trusted Technology.....	
4.2.1.9	SC_STH: Secure Transmission.....	
4.2.1.10	SC_OSH: Open Source Handling.....	
4.2.1.11	SC_CTM: Counterfeit Mitigation.....	
4.2.1.12	SC_MAL: Malware Detection.....	

The Open Group Standard

Open Trusted Technology Provider™ Standard (O-TTPS) – Mitigating Maliciously Tainted and Counterfeit Products

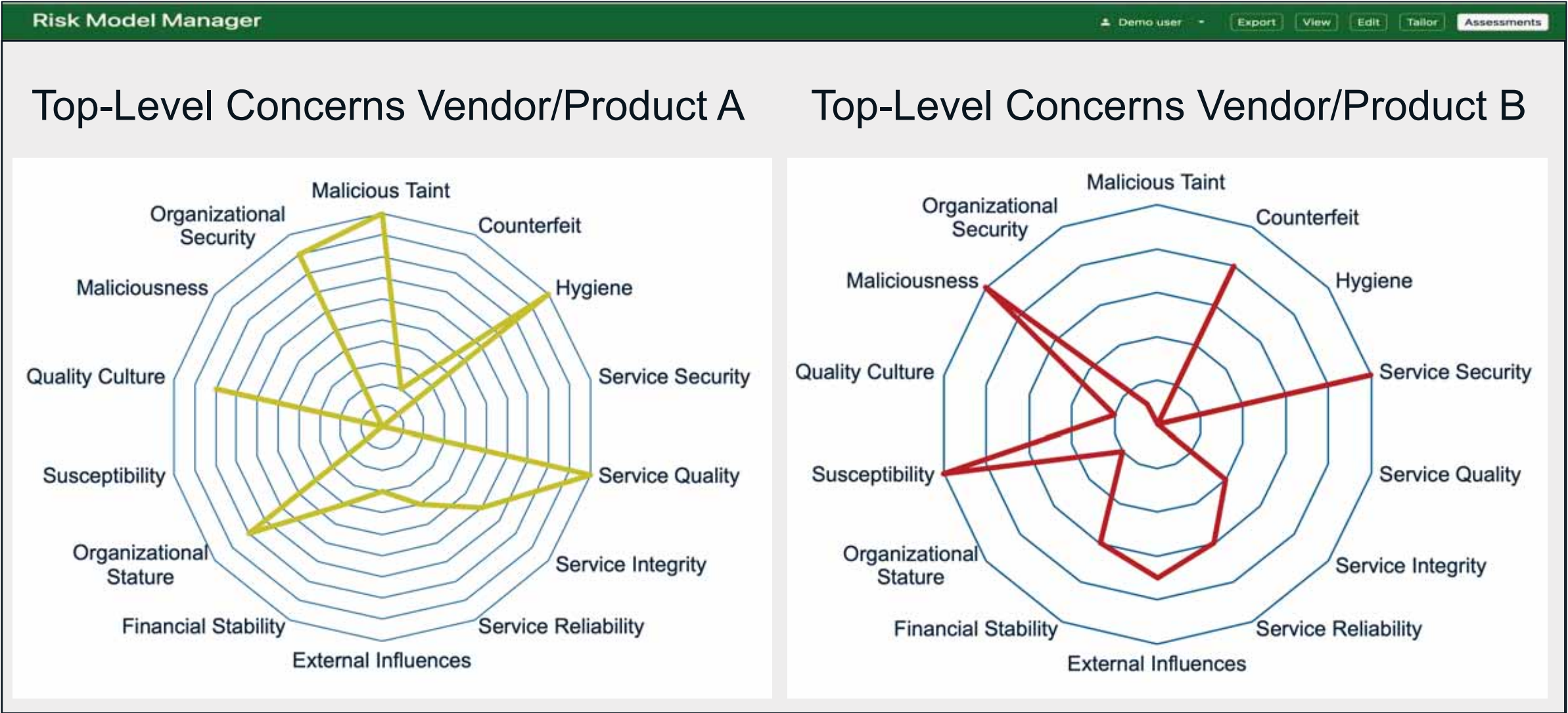
Part 1: Requirements and Recommendations

Version 1.1.1

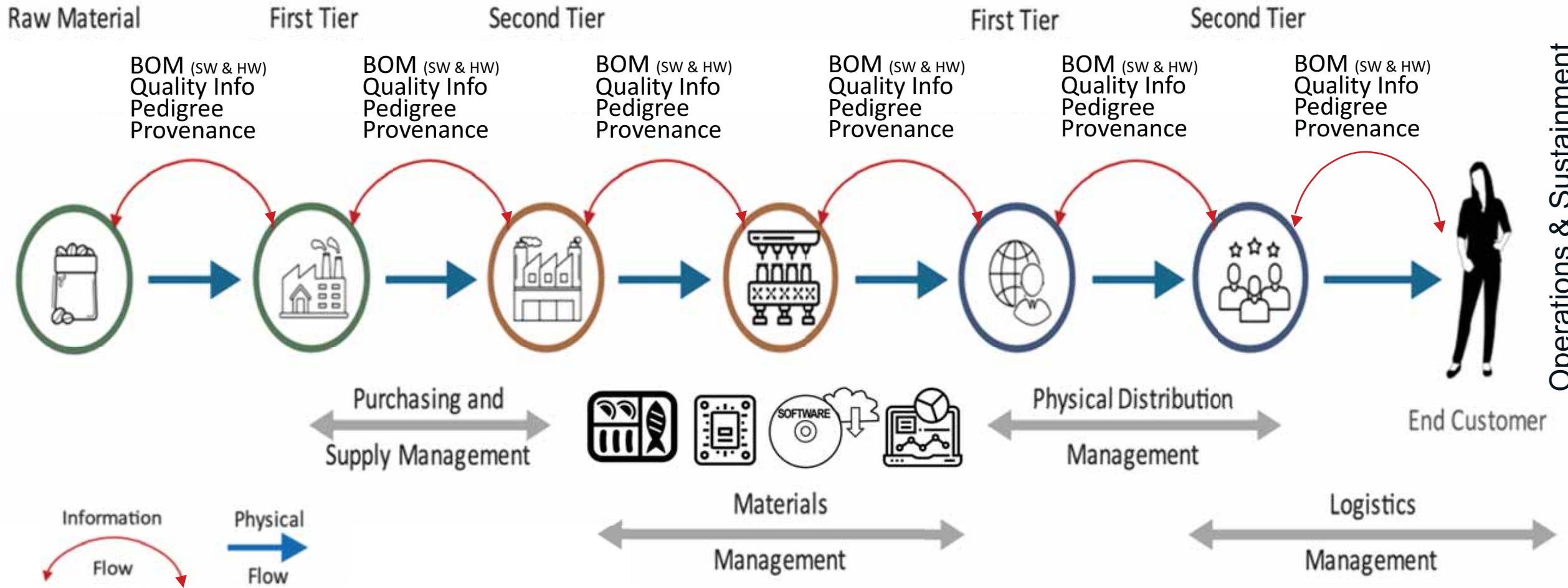


Along with DHS ICT SCRM Task Force Vendor Template, and others, ...

GOAL for use of SoT in Industry and Government...

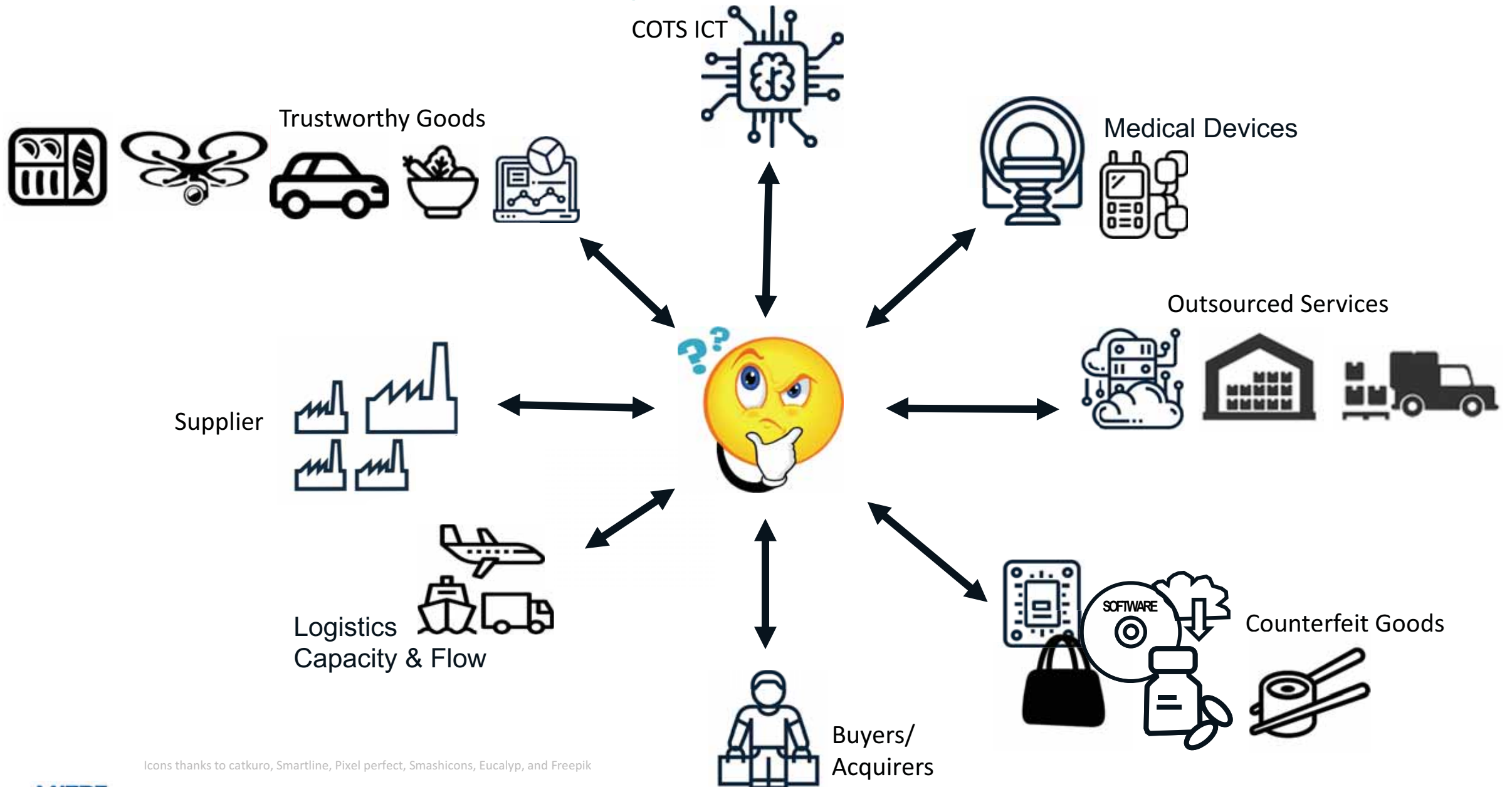


Supply Chains – As multi-Stakeholder Network



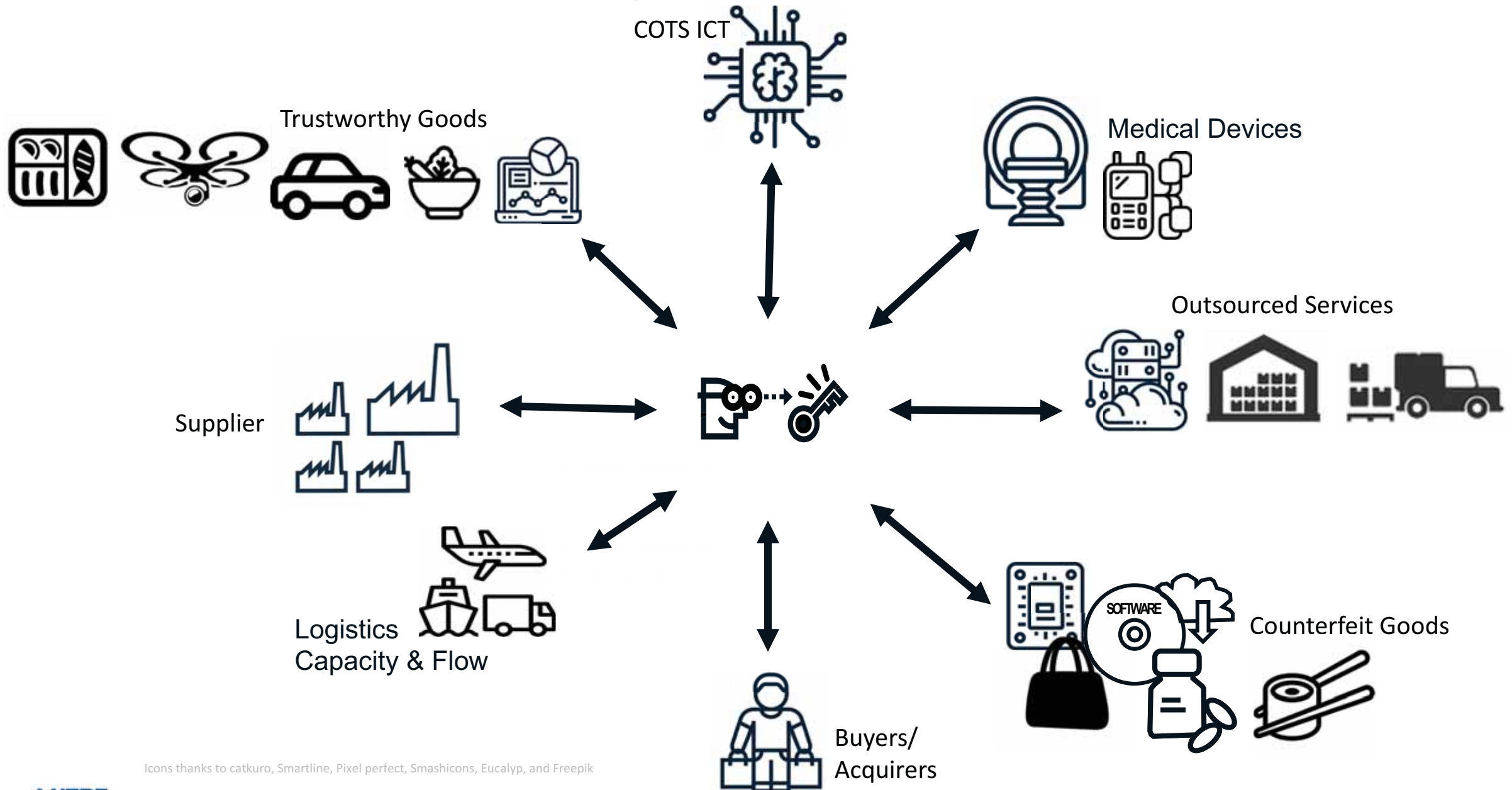
https://www.iiconsortium.org/pdf/Trustworthiness_Framework_Foundations.pdf

Effective Supply Chain Trust Interactions



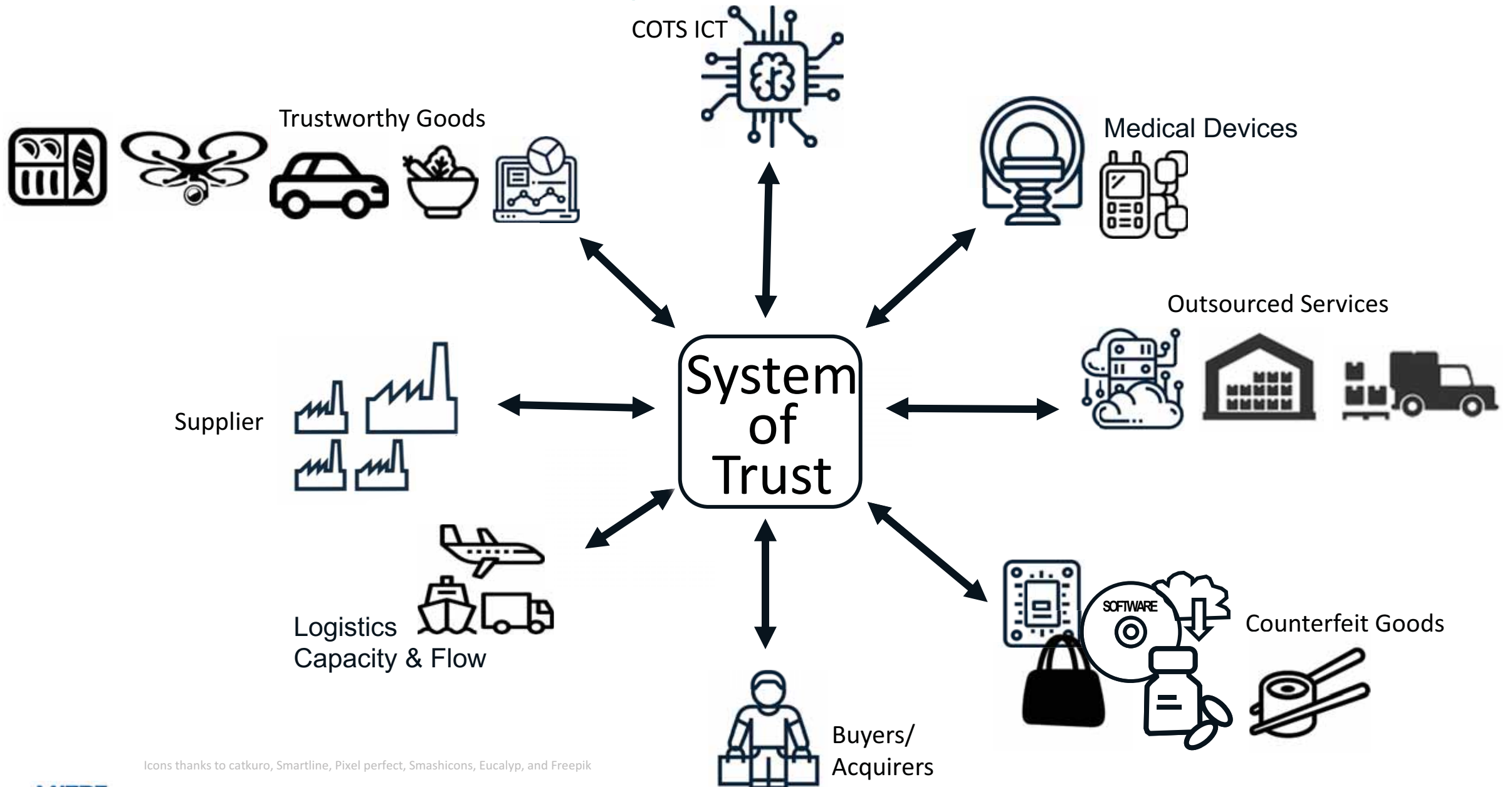
Icons thanks to catkuro, Smartline, Pixel perfect, Smashicons, Eucalyp, and Freepik

Effective Supply Chain Trust Interactions



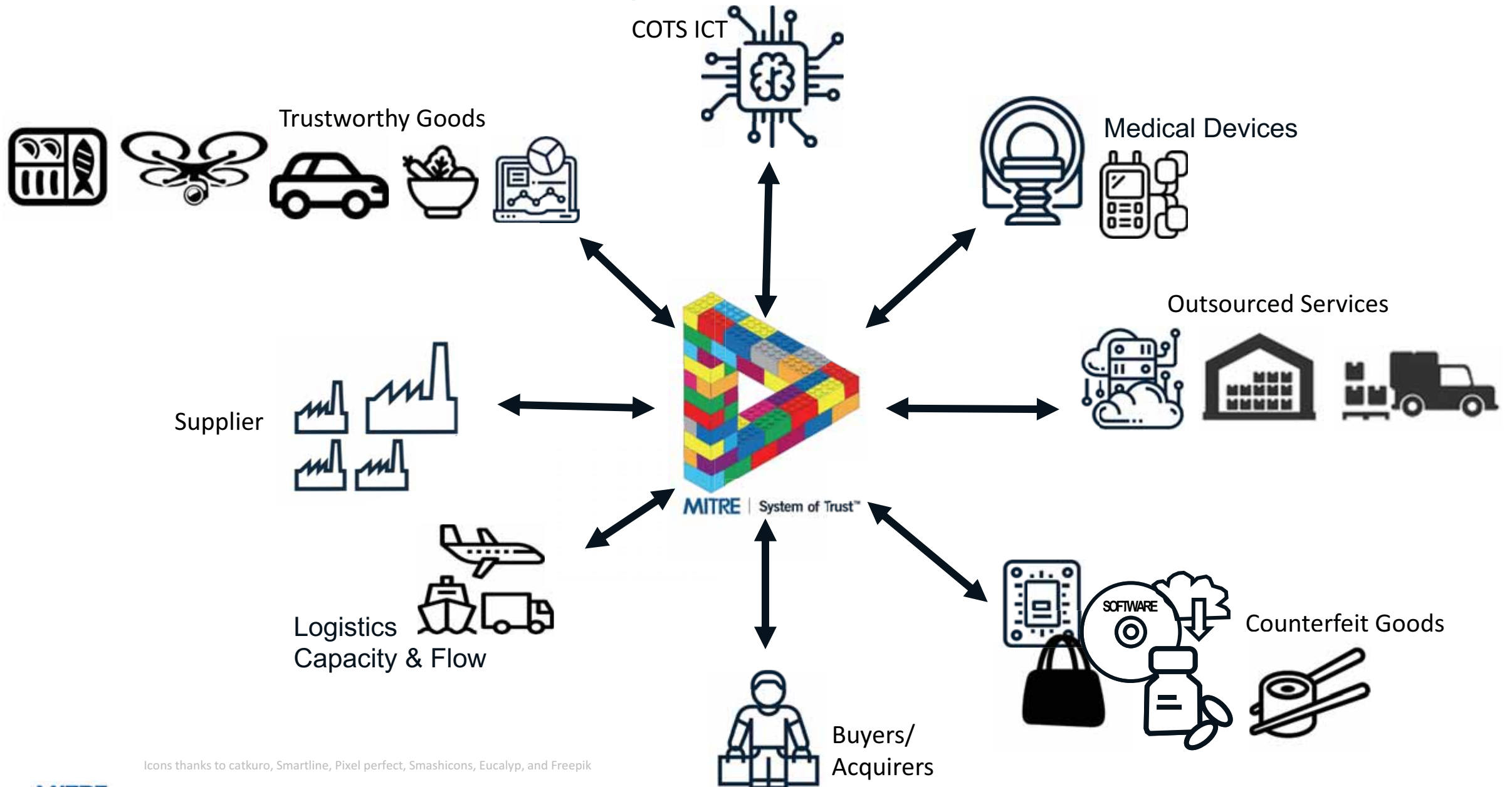
Icons thanks to catkuro, Smartline, Pixel perfect, Smashicons, Eucalyp, and Freepik

Effective Supply Chain Trust Interactions



Icons thanks to catkuro, Smartline, Pixel perfect, Smashicons, Eucalyp, and Freepik

Effective Supply Chain Trust Interactions



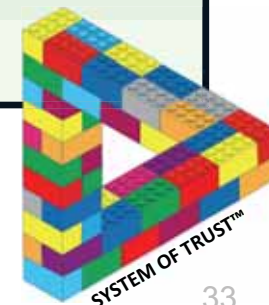
Icons thanks to catkuro, Smartline, Pixel perfect, Smashicons, Eucalyp, and Freepik

Examples of System of Trust Engagements

- DHS S&T Program Office
- American Bar Association (ABA) Technology Meeting
- Industry Technology & Innovation Roundtable
- Open Group July Member Meeting Plenary
- ABA IoT National Institutes Panel
- DoD/DoE NNSA Software Assurance Community of Practice
- DHS S&T FVEYES Supply Chain Workshop
- EOP/OMB – Maria Roat (Dep Fed CIO at OMB)/ Camilo Sandoval (Fed CISO)
- EOP/OMB w/Lesley Field / Mathew Blum / Jeremy McCrary – OFPP Team
- Raytheon Technologies Product Cybersecurity Tech Exchange
- Senate Homeland Security and Governmental Affairs Committee staff
- IIC Winter 2020 Quarterly Member Meeting
- House Homeland Security Committee staff
- ABA SciTech Lawyer article – Winter 2021 Issue
- GAO Supply Chain Report Authoring Team
- ATIS 5G/SC Working Group
- House Armed Services Committee staff
- Senate Armed Services Committee staff
- House Oversight Committee staff
- Chris DeRusha (Fed CISO)
- Soraya Correa (DHS OCPO)
- DHS CSWG Supply Chain Subgroup
- USEA Energy Technology and Governance Program UCSI Working Group
- ABA IoT National Institute
- IIC Summer Meeting
- Manufacturing Industry Leadership Council meeting
- Global Industry Organizations' Smart Manufacturing Workshop
- SAE G-32 Hardware WG meeting
- New England Council event
- NSTAC Software Assurance Sub-Committee

- Aerospace Industries Association
- TIA | QuEST Forum Supply Chain Security 9001 Webinar
- Staff of Rep. Elissa Slotkin
- HASC critical defense supply chain TF report Staff
- ADM Mauger US Coast Guard Assistant Commandant for Prevention Policy (CG-5P)
- Navv Research, Development & Acquisition (ASN/RD&A)
- House Committee on Oversight and Reform
- Q3 IIC Information Day - Fuel Your Digital Transformation Journey
- CISA NRMCC Supply Chain Trustworthiness Framework IPT
- CISA Standards Area Lead for C-SCRM
- MDA Ground Missile Defense PM
- DoE CESER Cybersecurity Senior Advisor
- House Permanent Select Committee on Intelligence
- Electric Power Research Institute (EPRI)
- Common Attack Pattern Enumeration (CAPEC) Workshop
- HHS ASPR RISC 2.0 Leadership Team
- DoC SCRM Team
- IIC March 2022 Event
- SW Supply Chain Integrity and SoT to ESF Team
- CMS CIO
- ELISA Workshop
- CISQ Webinar
- Software Supply Chain Security Webinar
- System of Trust with VA SCRM Team
- SW Supply Chain Integrity and SoT to RKVST Team
- SW Supply Chain Integrity and SoT to Dell Team
- American Bar Association (ABA) Technology Meeting
- RSA Conference 2022
- Open Group July Member Meeting Plenary
- Hacks In Taiwan Conference 2022
- Hot Topics in Supply Chain Security 2022 Summit
- CISQ Resilience Summit

- Executive Acquisition
- Congressional Committees



System of Trust Plans with Sponsors and Industry



Assessment Capabilities for Sponsors, Industry and Academia



Training Sponsors & Industry on the SoT methodology, content, and platform



Standards and best practices oriented around SoT



Evolving SoT BoK with Domain SMEs to enhance Risk Factors



Mapping SoT to Industry and Government standards and assessment mechanisms



Active Feedback with communities on enhancements to SoT



No-Cost* Licensing RMM tool & SoT content to Industry for integration in their own assessment practices and offerings



MITRE | System of Trust™

Publications to date...

TheSciTechLawyer WINTER 2021



CUTTER Business Technology Journal

Management, Innovation, Transformation

Vol. 33, No. 5 2020 • REPRINT

"A system of trust needs to have a pervasive, holistic approach to everything that can be of concern and needs to be truly effective in supporting our management of all items of concern."

The Supply Chain Security System of Trust:

A Framework for the Concerns Blocking Trust in Supplies, Suppliers, and Services

by Robert A. Martin

In this article, Robert A. Martin addresses the complete ecosystem involved in the procurement of products and services. What does it mean to trust that what you buy, and the organizations that sell to you, meet all the conditions required to merit your trust? Martin describes the elements of a system of trust for supply chain security that is currently under development and is based on collecting information from a wide community of procurement departments and standards organizations.

<https://www.cutter.com/offer/supply-chain-security-system-trust>



<https://www.mitre.org/sites/default/files/publications/pr-21-0278-deliver-uncompromised-securing-critical-software-supply-chains.pdf>



<https://www.mitre.org/publications/technical-papers/trusting-our-supply-chains-a-comprehensive-data-driven-approach>



<https://www.mitre.org/publications/technical-papers/supply-chain-security-it's-everyone's-business>



Supply Chain Security



Industry, government, and academia are putting increased focus on the need for trustworthy supply chains, trustworthy partners, and trusted systems globally. A reliable path to an actionable understanding of the risks that can impact the trustworthiness of supplies, suppliers, and services is essential.

The [System of Trust Framework](#) aims to provide a comprehensive, consistent, and repeatable supply chain security [risk assessment](#) process that is customizable, evidence-based, and scalable, and will enable all organizations within the supply chain to have confidence in each other, service offerings, and the supplies being delivered.

SoT@MITRE.ORG

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Growing Engagement about System of Trust

	<u>Organization</u>	<u>Role</u>
<div>Signed NDA</div>	<ul style="list-style-type: none">Company 1Company 2Company 3Company 4	Microelectronics SMEs Supply Chain Illumination SMEs Critical Infrastructure SMEs Supply Chain Illumination SMEs
<div>Drafting NDA</div>	<ul style="list-style-type: none">Company 5Company 6Company 7Company 8Company 9	Organization with Supply Chains Organization with Supply Chains Cybersecurity Illumination SMEs Cybersecurity Illumination SMEs Supply Chain Illumination SMEs
<div>Discussing SoT</div>	<ul style="list-style-type: none">Company 10Company 11Company 12Company 13Company 14Company 15Company 16Company 17Company 18Company 19	Organization with Supply Chains Community Engagement SMEs Organization with Supply Chains Organization with Supply Chains Organization with Supply Chains Supply Chain Illumination SMEs Organization with Supply Chains Retail Banking SMEs Third Party Risk Management SMEs Sustainability SMEs

Working
on
mechanisms
to
scale
our
engagements
beyond
NDAs