CyFun® 2025 as an Objective and Maturity based Evaluation Framework for NIS2 Compliance Assessments

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NIS2's Implicit Question

NIS2 does not ask:

Do you have controls?

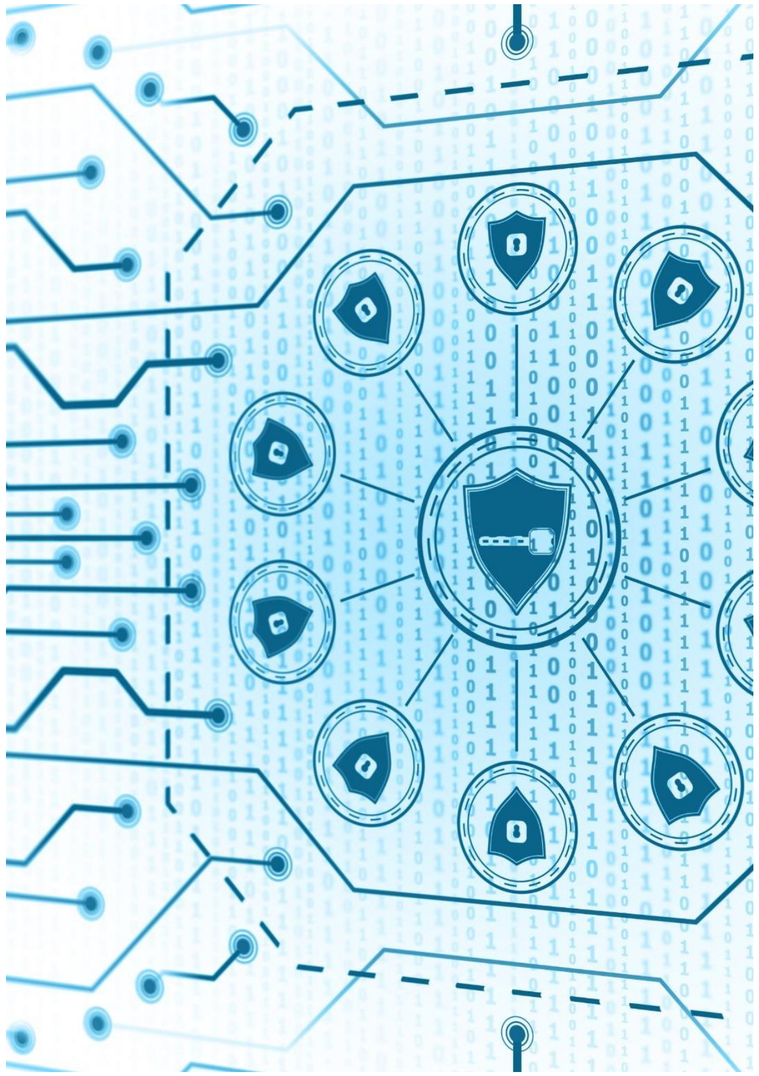
NIS2 asks:

Can you manage cyber risk, sustainabl
and under governance?

This is a **capability** question,

not a **checklist** question.

Why Controls Are Not Enough



Controls tell us:

That something exists

They do not tell us:

- If it works
- If it is governed
- If it will still work tomorrow
- If management is accountable

Controls alone ≠ cyber resilience (NIS2 intent)

Introducing “Capability”

In CyFun®, a capability is:

The demonstrable ability of an organization to manage a specific cyber risk in a sustainable, governed, and repeatable way.

Key aspects:

- Organisational
- Lifecycle-based
- Outcome-driven

What Makes a Capability

A capability only exists when several elements come together:

1. Governance and ownership
2. Risk-based decision-making
3. Operational execution
4. Monitoring and feedback
5. Continuous improvement

Without all five:

- No capability
- Only isolated controls

Why Capability Is Central to NIS2

NIS2 explicitly requires:

- Risk-based security (Art. 21)
- Management responsibility (Art. 20)
  - *Effectiveness over time*
  - *Proportionality*

These requirements:

- Cannot be validated via controls alone
- **Can** be evaluated via capability maturity

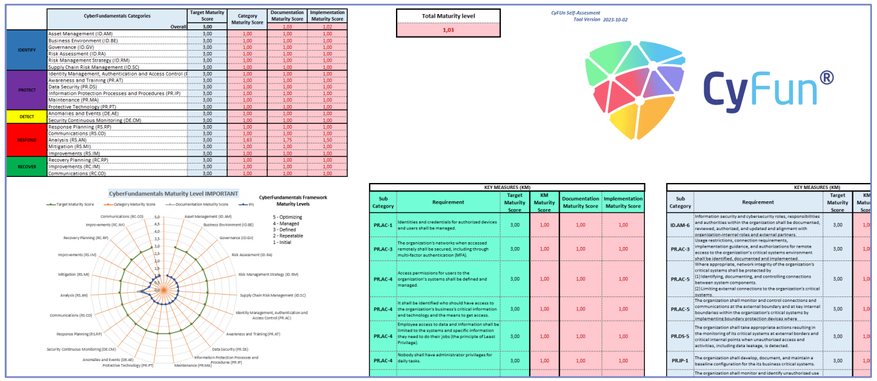
Capability Needs a Measure: Maturity

Capability alone is not enough.

Supervision also needs to answer:

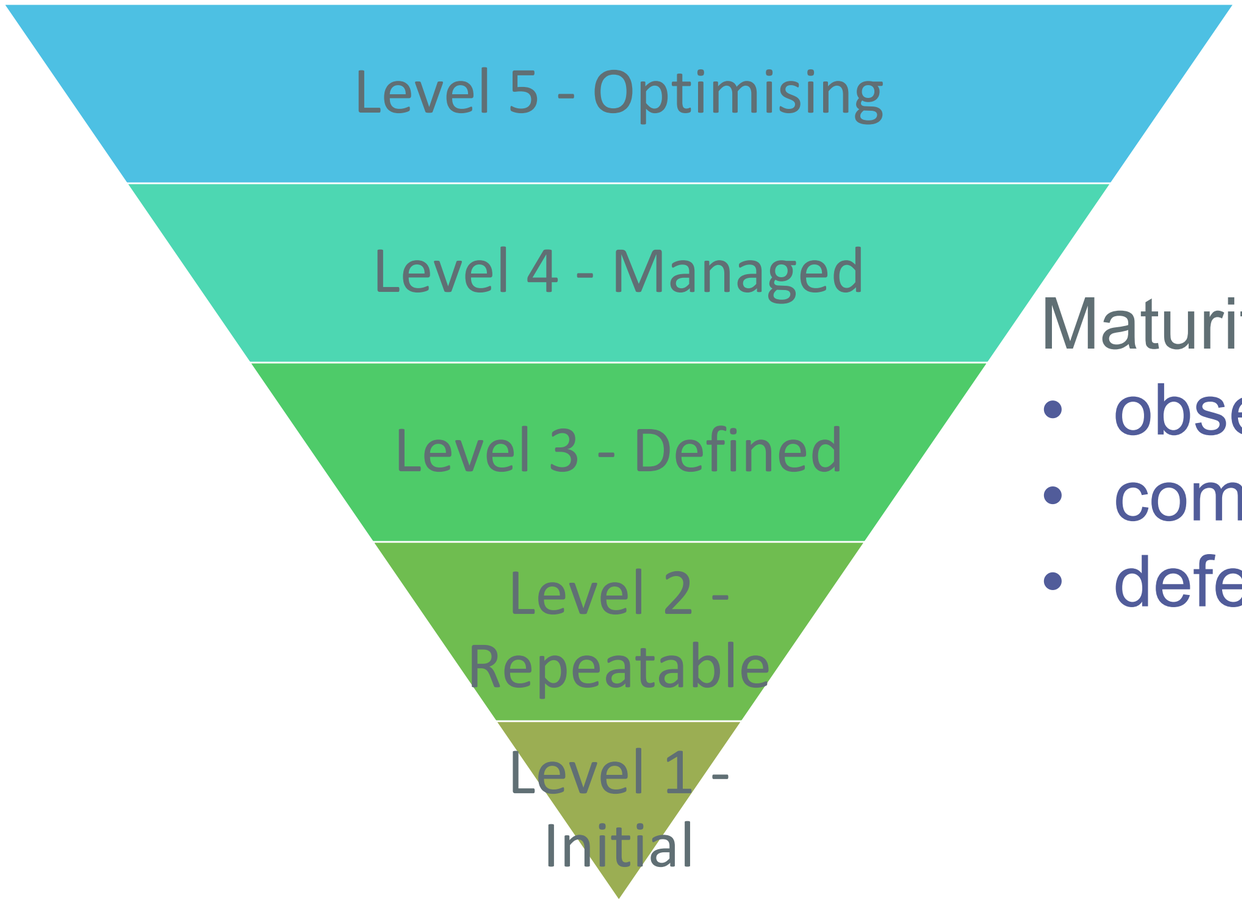
- *How robust is this capability?*
- *How well is it embedded?*
- *How dependent is it on individuals?*

This is where
maturity assessment
comes in.



Maturity in CyFun®

The CyFun® CAS uses a **uniform maturity scale**:



Maturity makes cyber resilience:

- observable
- comparable
- defensible in supervision

What CyFun® CAS Actually Assesses

CyFun® CAS does **not** assess:

- Tools
- Technologies
- Vendors

It assesses:

- How capabilities are organised
- How decisions are made
- How risk is controlled
- How improvement is driven

Organisational behaviour, not artifacts.

Example: Incident Response Plan

RS.MA-01.1 An incident response plan, including defined roles, responsibilities, and authorities, shall be executed during or after a cybersecurity event affecting the organisation's critical systems (CyFun® BASIC)

Low maturity:

- Incident response plan exists
- Roles and authorities unclear in practice
- Execution is ad hoc and reactive
- Response depends on individuals

Higher maturity:

- Clear ownership and decision authority
- Management involved according to defined escalation rules
- Incident response regularly tested and exercised
- Lessons learned drive updates to the plan and execution

Same “control”, different **capability maturity**

Why This Enables Objectivity

CyFun® CAS relies on:

- Observable practices
- Decision structures
- Evidence of consistency
- Management interaction

Result:

- Reduced assessor subjectivity
- Comparable outcomes
- Defensible assessments

From Capability Maturity to NIS2 Compliance

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CyFun® provides a structured link between:

- NIS2 obligations (Art. 20 & 21)
- Observable organisational capabilities
- Maturity-based evidence of effectiveness

This enables:

- Consistent interpretation of NIS2 requirements
- Risk- and maturity-based supervision
- Defensible supervisory conclusions

What Regulators Gain

With CyFun®, authorities can:

- Compare entities fairly and consistently
- Supervise proportionally, based on risk and maturity
- Identify and prioritise weakest capabilities
- Track measurable improvement over time

Supervision shifts from:

“**Is this compliant?**”

to

“**Is this organisation cyber-resilient?**”

What Organisations Gain

Organisations gain:

- Clear expectations
- Structured improvement paths
- Management-level insight
- Defensible compliance position

Compliance becomes:

- Operational
- Measurable
- Strategic meaningful

Closing: The Core Message

- NIS2 compliance is not binary
- It is **capability-based**
- And must be evaluated through **maturity**

Cyber resilience is not about having controls.

It is about having mature capabilities.

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What does TLP Green mean?

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TRAFFIC LIGHT PROTOCOL (TLP)

Green (TLP GREEN)

Limited disclosure, recipients can spread this within their community.

Sources may use **TLP:GREEN** when information is useful to increase awareness within their wider community.

Recipients may share **TLP:GREEN** information with peers and partner organizations within their community, but not via publicly accessible channels (e.g. websites, LinkedIn…). **TLP:GREEN** information may not be shared outside of the community. Note: when “community” is not defined, assume the cybersecurity/defense community.