



THIRD PARTY DUE DILIGENCE POLICY

Version Number	Creation/ Revision Date	Prepared /Updated By	Reviewed By	Approved By	Change Description
1.0	01.06.2021	Compliance & Risk Committee	RiskPro	Group CEO	No Changes
1.1	17.11.2021	Compliance & Risk Committee	RiskPro	Group CEO	Updated Conflict Check, CRC responsibilities
1.2	18.05.2022	Compliance & Risk Committee	RiskPro	Group CEO	Added Acronyms and changed the Business Partner Due Diligence Questionnaire to what is being used currently. As well, added Appendix V

TECHNO BRAIN THIRD PARTY DUE DILIGENCE POLICY

Introduction

All transactions by Company with third parties are made based on quality, service, competitive price. This guidance document provides a framework to ensure appropriate rationale, risk categorization, due diligence¹, contracting, training and monitoring of third parties until the end of a business relationship.

Scope

This framework applies to all entities under Techno Brain Group (each entity shall be referred to as “Company” for the purpose of this document), employees, AND the third parties which includes Partners, Subcontractors, Consultants, Suppliers for Service Provider and Vendors.

Management Process

The following types of third parties are either in scope or out of scope of this

In Scope	Out of Scope
<p>-Any party supplying goods to Company, and/or performing services for or on behalf of the Company.</p>	<p>-Low risk entities engaged for administrative transactions e.g. Courier, housekeeping, caterers, photographers etc. -Suppliers of Hardware, Software, Devices and Equipment -Standard Service Providers like Auditors, Law Firms, Company Secretary firm. -All out-of-scope suppliers will be reviewed annually by CO from a risk based approach to check if they pose any integrity risk on Techno Brain. If yes, then we have to bring those suppliers under 'in scope'. CO will inform to CRC and respective Function heads to initiate DD process. - Samples of Third-Party Due Diligence Forms that have been filed for “Low Risk” third parties are reviewed annually to ensure that the designation of “Low Risk” is being applied appropriately and to evaluate whether changes are needed, and that such review is recorded in an auditable fashion; - Document the reasoning and archive those moved from Out of scope to in scope suppliers.</p>

¹ Due diligence is a thorough assessment of a potential or existing third party with the objective of having all the relevant information at hand to take an informed, risk-based decision on whether and how Company should enter into a contractual relationship or modify/ terminate an existing relationship.

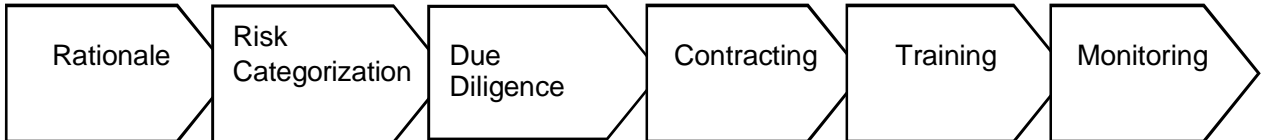
	- Document rationale for the rest of the out of scope suppliers for not bringing them under 'in scope'
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Responsibilities

Roles	Responsibilities
Business Function	<ul style="list-style-type: none"> -Ensure staff involved are adequately trained on this framework -Ensure business need for engaging a third party -Perform risk categorization and appropriate due diligence -Resolve red flags in consultation with relevant functions -Use legally approved agreement template/ agreement drafted by legal with appropriate covenants surrounding Anti-Bribery provisions -Ensure review and sign off of third party due diligence form -Rollout /conduct third party trainings if required -Conduct routine monitoring -Ensure Archive of all records
Compliance & CRC	<ul style="list-style-type: none"> - Provide necessary support and guidance to resolve red flags -Monitor adherence to this framework - Review of the Due diligence records and get required documents from vendors through business functions - After reviewing the DD outcome if red flags are noticed then approval is based after thorough deliberations with the BU team following a risk based approach. Further document the rationale of approving the vendor. - CO and/or CRC review and sign the Third Party Due Diligence Form prior to engaging any third parties for whom “red flags” have been identified or who are categorized as “High Risk” under the policy; - CO and/or CRC review and approve any request to modify the standard integrity/anti-corruption language in contracts with third parties;
Legal	<ul style="list-style-type: none"> -Provide necessary support and guidance to resolve red flags -Provide appropriate agreement template/draft agreement - Provide appropriate representations and warranties

Shared Services	Track the validity of third party due diligence forms – timely reinitiating, intermittent on-line fact checks etc.
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Procedure



Rationale

The Strategic Business Unit needs to ensure a strong business rationale for engaging a third party.

Risk Categorization

The Strategic Business Unit needs to perform a risk categorization on third parties to classify them as “low risk” or “high risk” third parties.

The following risk assessment questionnaire needs to be used for the risk categorization:

Risk Assessment Questionnaire ²	Yes	No
Will the third party be working on the Company’s projects with End Customers (especially Government Customers) and providing Services in the capacity of Technology Partners, Sub Contractors, Consultants, etc. For example: Sales Consultants, Services for the Project,	High Risk	Low Risk
Will the third party be handling Company’s Solutions and IP? For example: External consultants working on our IP, Partner development	High Risk	Low Risk
Will the third party be interacting with any Government agency or Government Official? For example: Customs House Agents; OEM Technical Services and Support,	High Risk	Low Risk
Will the goods and/ or services to be provided by the third party considered critical for the continuation of operations? For example: Sole service vendors where we do not have a BCP option	High Risk	Low Risk
Will the third party have access to sensitive confidential information? For example: IP Development Consultant, Sub Contractor working on Projects, Reseller,	High Risk	Low Risk

Due Diligence

Depending on the third party risk categorization, the following due diligence activities needs to be completed for a third party under consideration.

² A third party will be considered as a “High Risk third party’ if the response to any of the questions above is ‘Yes’.

The “Questionnaire for Third Party” stating that the third party must submit relevant documents in support of its responses (e.g., in response to the question regarding whether the third party has a compliance program);

The Compliance Officer & CRC team to conduct the “Definitive” and “red flag” reviews.

Level of due diligence	Scope	Available Tools	Risk Category	
			Low Risk	High Risk
Basic due diligence	Legal entity/ Owner structure; Detailed invoicing/site address; Banking details, contact details; Anti-Corruption Compliance; Business Overview (Type/ Key Services/ Key Representatives); Conflict & Integrity checks	<ol style="list-style-type: none"> 1. Vendor master form 2. Questionnaire for third party 3. Assurance confirmation for anti-corruption compliance 4. Third party due diligence form 5. Company's supplier code of Conduct ³ 	✓	✓
In-depth due diligence	Risk Assessment (Financial Risk; Supply Risk; Quality and Safety Risk; Legal Risk; Reputation/ SHE/ Social/ Ethics/ Human Rights Risk); Site visit	<ol style="list-style-type: none"> 1. Independent assessment ⁴(In-depth due diligence results) 2. Third party due diligence form 		✓

The due diligence process may identify Red Flags ⁵that need to be fully investigated and satisfactorily resolved in consultation with relevant functions before entering into the engagement.

Examples of Red Flags include but are not limited to:

- Adverse Media
- Conflict of Interest
- Refusal to disclose information
- Legal, Reputational, Financial issues/risks

The Strategic Business Unit needs to document the outcome of the due diligence review in the ‘Third Party Due Diligence Form’ (see Appendix III). In case a red flag(s) is identified, the

³ Company Supplier code of conduct can be download from Company's website.

⁴ This assessment can be internalized depending on the scope and level of internal expertise. In such case the Strategic Business Unit needs to maintain appropriate documents as evidence of in-depth due diligence performed. CO and/or CRC direct and oversee any “independent assessment”

⁵ A Red Flag is information that indicates an increased risk of corruption or another potential issue with a third party, such as any undesirable characteristic that pertain to a company's ownership, business structure or relationships and/or compliance with laws.

SBU shall document them along with actions to resolve red flags (if any) in the 'High Risk or Red Flag Third Party Engagement Approval Form' (see Appendix V)

CO/CRC to discuss in a meeting and approve or disapprove the third party when there is a red flag or with high risk. The approval has to be documented in the 'High Risk or Red Flag Third Party Engagement Approval Form' (see Appendix V).

The 'High Risk or Red Flag Third Party Engagement Approval Form' needs to be signed by the Strategic Business Unit Head and CO to document the decision of third party selection and approve any third party designated as "High Risk" or with red flags.

Contracting

Before a third party can be engaged, or receive any payment from the Company, agreement templates approved or drafted by Legal needs to be used for engagement. Any amendment to the signed Contract, shall have to undergo the set process of approval for the type of Contract.

Training

The appointed third party may require relevant training to fulfil the contractually agreed obligations according to Company's standards and expectations. The Strategic Business Unit in consultation with the Compliance and Risk Committee shall decide the content, approach and extent of such training.

Monitoring

The level of risk that a third party poses may change over time. Therefore, Strategic Business Unit needs to monitor the relationship with the third parties.

It is recommended that the Strategic Business Unit monitors the third party at regular intervals to look for the following indicators:

- Changes in ownership /entity structure
- Newly identified Red Flags
- Non-compliance with terms & conditions of the agreement
- Unmet or poorly met business Key Performance Indicators
- Samples of monitoring records are reviewed annually to ensure that monitoring is being conducted and recorded appropriately.

In absence of a standard template, the Strategic Business Unit may use the template suggested in this framework to document the evidence/outcome of the monitoring (see Appendix IV). Techno Brain will monitor the low-risk vendors by sending a form "Third Party Annual Undertaking Document" annually to ensure there are no risks. If any risks found we will have to move them in scope and do Due diligence check as per the process.

Tracking & Archival

All documents providing evidence of due diligence, contracting, training (if any) and monitoring needs to be archived by the respective Strategic Business Unit on a Company specifies

archival folder (Example: One Drive). This will include but not limited to the questionnaires, third party due diligence form, in-depth due diligence results, agreement, training records (if any) & monitoring reports.

Any due diligence that has been completed may later be used by the same or other Strategic Business Units, provided that (i) the due diligence is not older than 2 years, and (ii) there are no changes in ownership or entity structure of the third party (iii) no Red Flags have been identified since due diligence was last completed.

Policy Review

This policy shall be reviewed once every two years or when business needs arise.

Acronyms

CRC	Compliance and Risk Committee
CO	Compliance Officer
BU	Business Unit
DD	Due Diligence
SBU	Strategic Business Unit

List of Appendices

Appendix I Assurance confirmation for Anti-corruption compliance (To be filled by the third party)

Appendix II Business Partner Due Diligence Questionnaire for third party
(To be filled by the third party)

Appendix III Third party due diligence form
(To be filled by the Business Function)

Appendix IV Suggested template for monitoring
(To be filled by the Business Function)

Appendix V High Risk or Red Flag Third Party Engagement Approval Form
(To be filled by the Business Function)

APPENDIX I - ASSURANCE CONFIRMATION FOR ANTI-CORRUPTION COMPLIANCE

(To be filled by the third party)

Third parties are requested to provide a confirmation on the ‘anti-corruption compliance requirements’ by signing this form.

Note: Do not leave any section Blank. Do not mention Not Applicable ‘NA’.

Third party		Contact Person	
Name:		Name:	
Phone:		Designation:	
Email:		Phone:	
Registered Address:		Email:	

We are aware that Techno Brain does a risk based local corruption risk assessment of its external business

We herewith confirm the following:

1. We are committed to compliance and integrity in all business dealings. We comply with all applicable laws, regulations and industry codes, as well as the Techno Brain’s integrity standards as set forth in the Techno Brain Group Code of Conduct and Techno Brain Supplier Code of Conduct (if applicable). Especially we will desist from any form of corrupt behavior (e.g. offer, give, solicit or accept bribes or improper advantages; fraud;
2. We do not create any false documents. All documents we create are true and reflect in a transparent way the services we have provided.
3. We require our own Business Partners with whom we are doing business on Techno Brain behalf to also comply with all applicable laws, regulations and industry codes, as well as Techno Brain Group integrity standards. Therefore, we conduct an adequate due diligence before entering into a Definitive Agreement.
4. To the best of our knowledge, there are no past or current allegations, investigations, convictions or prosecutions relating to corruption involving (i) us, or (ii) as far as we are aware our Business Partners with whom we are doing business on Techno Brain’s behalf.
5. We will immediately inform appropriate Techno Brain contact and/or Company Compliance and Risk Committee, if we or any of our own Business Partners: have/has a compliance concern or question;
6. In case of a reasonable suspicion of a non-compliance behavior of us, we will fully collaborate with any requests for information, documents or assistance arising out of an audit by Techno Brain or an independent third party.
7. In case Techno Brain is the subject of an investigation of authorities, we will fully cooperate with the Investigator.
8. We understand Techno Brain’s integrity standards and commit to adhere to those. We realize that Techno Brain does not tolerate non-compliant behavior and that it reserves the right to take appropriate action.

Authorized Representative

Signature

Name:

Title

Date:

Place

Stamp:

APPENDIX II – BUSINESS PARTNER DUE DILIGENCE QUESTIONNAIRE FOR THIRD PARTY

(To be filled by the third party)

Techno Brain Global FZ-LLC fka Techno Brain Global FZE, (“Techno Brain”) or (“the Company”) is a free zone establishment incorporated on 17 march 2010 in RAKEZ Free Trade Zone in the Emirates of Ras Al Khaimah, United Arab Emirates (“UAE”).

It is the Company’ policy to operate to the highest standards of compliance, integrity and legality. The Company is committed to conducting business with Partners, Suppliers, Vendors, Consultants and other entities who intends to work with Techno Brain, that share same approach and adhere to these or similar standards. In order to gain a better understanding of the organizations we work with, we invite them to complete a DDQ.

The Company would be grateful if you could answer all the questions in English and as fully as possible. Please submit the relevant documentation along with the completed questionnaire.

SECTION 1: ORGANISATION DETAILS

1.1) Organization contact details

Organization Name	
Registered and physical address of Company	
Telephone No	
Website	

1.2) Please attach copies the following certificates to confirm your registration and tax status in your organization’s country of domicile:

- a) A certificate of incorporation (or equivalent)
- b) A VAT and/or tax registration certificate (or equivalent)
- c) Copy of Memorandum of Association (MOA) and Articles of Association (AOA) of the Company

If you cannot provide any of the above certificates, please give an explanatory statement:

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1.3) Please attach copies the following certificates to confirm your legal, regulatory and tax compliance status of your organization’s in the country of domicile:

- a) Annual Return to Registrar of Companies
- b) Business license
- c) Tax Clearance certificate
- d) Good standing letter from main Banker

If you cannot provide any of the above certificates, please give an explanatory statement:

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1.4) Organizational Status

	Tick box or leave comment
Public Limited Company	

Private Limited Company	
Public or State Organisation	
Other (please detail)	

1.5) Financial Performance

Please provide last three years of audited financial Statement and latest available Management Accounts (if any).

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1.6) Please provide a list of all your Organisation’s directors, Key Management Personal, shareholders or owners.

Individual’s full name (including middle name, if any)	Employee, Director or Owner / Shareholder	PEP* YES / NO	Relationship with PEP YES / NO

**A Politically Exposed Person (PEP) is someone who holds or has held a senior position in any state, national body or international body including government, civil service, judiciary, armed forces or public organization such as the UN or World Bank or is a family member of a known close associate of a PEP.*

1.7) Staff numbers

Number of permanent (full time) employees:	
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1.8) Customer Testimonials

Customer Testimonials of the projects completed or services provided of similar size and nature.

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1.9) Supplier Reference

Please provide 3 key supplier references.

1.10) Authorized signatory

Please provide detail list of authorized signatory to act on behalf of the Company for the proposed projects and key contracts.

SECTION 2: PARENT ORGANISATIONS, SUBSIDIARIES AND AFFILIATES

Please provide details of any parent organization, subsidiaries or affiliates of your organization along with registered office and physical address of the Company.

As per list attached

Please provide details of ultimate beneficiary

As per list attached

SECTION 3: LITIGATION AND INVESTIGATIONS

Is there in your home country or elsewhere currently any pending or threatened material litigation or other proceedings connected with your Company, its directors, officers or 10% shareholders?

Yes No

If you have answered “Yes” to question, please give an explanatory statement:

SECTION 4: ETHICAL HISTORY

4.1) In the last ten years has your organization or have any directors, 10%+ shareholders or owners of your organization;

4.1a) ever been bankrupt, insolvent and/or unable to pay his or its debts, sought protection from his or its creditors, been wound-up or compulsorily dissolved by any court or tribunal or been involved in any proceedings?

Yes No

4.1b) ever been convicted of a criminal offence in any country related to fraud, theft, bribery, corruption, money laundering, human rights violations (including anything related to the abuse of children), modern slavery, anti-competitive or other unlawful or unethical behavior?

Yes No

4.1c) entered into any deferred prosecution agreement, settlement, resolution agreement or similar arrangement with any law enforcement, prosecutorial or regulatory agency or body relating to investigations or allegations of fraud, theft, bribery, corruption, money laundering, human rights violations, modern slavery, anti-competitive or other unlawful or unethical behavior?

Yes No

4.1d) ever failed to pay taxes that were due?

Yes No

4.1e) ever been listed by any country or organization as being involved in terrorist or money-laundering activities?

Yes No

4.1f) ever received or been the subject of allegations or press/media reports of misconduct including fraud, theft, bribery, corruption, money laundering, human rights violations, modern slavery, anti-competitive

behavior (including bid-rigging, cartels, collusion or coercion), damage to the environment, health or safety of employees or abuse of children?

Yes No

4.1g) ever voluntarily disclosed to any regulatory and/or law enforcement agency any activity that may constitute bribery, money-laundering, fraud, or another criminal offence involving fraud, corruption, modern slavery or unethical behavior?

Yes No

4.1h) ever had cancelled, revoked or failed to hold a license or membership of an organization required by law?

Yes No

4.2) Are any directors, officers or 10%+ shareholders of your Company, or any of its associated companies, an employee or official in any state owned entity or public international organization?

Yes No

4.3) Is your organization or any director, officer or 10%+ shareholder of your organization, or any of its associated organizations, currently sanctioned by, barred or suspended from doing business with any government, national or public international organization including any multilateral development bank?

Yes No

If you have answered "Yes" to any of questions 5.1 to 5.3 please give an explanatory statement:

SECTION 5: ETHICAL POLICIES

5.1) Does your Organisation currently hold policies or guidelines on the following?

Anti-Fraud, Bribery & Corruption (or equivalent)

Yes No

Conflicts of Interest (or equivalent)

Yes No

Ethical Code of Conduct (or equivalent)

Yes No

5.2) If you have answered yes to any of 5.1, are those policies or guidelines proactively flowed down within your organisation?

Yes No N/A

5.3) Does your organization undertake due diligence on the organizations with which it deals, including joint-venture partners, contractors, consultants, sub-contractors, suppliers, representatives and agents?

Yes No

5.4) Does your organization agree to adopt, comply with and implement the Company' Ethical Code for Business Partners when working with Techno Brain?

Yes No

SECTION 6: DECLARATION

TECHNO BRAIN ANTI-FRAUD, BRIBERY AND CORRUPTION POLICY STATEMENT

“Techno Brain operates a zero tolerance approach towards all forms of fraud, bribery and corruption. It does not give or accept bribes (including so called "facilitation payments") or any other illegal inducements, and will not condone any such action by its employees, agents, representatives, contractors, suppliers or consultants in compliance with Techno Brain Anti-Corruption Anti Bribery Policy”.

I confirm that the information I have supplied in this BPQ is correct, complete and not misleading. On behalf of my organization I acknowledge, understand and fully agree with Techno Brain’ Anti-Fraud, Bribery and Corruption Policy Statement above. I understand that the Company may carry out independent validation checks to verify the information contained within this questionnaire.

Title	
Name	
Position	
Signature	
Date	

ANNEXURE-1: TECHNO BRAIN'S ANTI-BRIBERY AND ANTI-CORRUPTION POLICY



ANNEXURE-2: TECHNICAL AND FINANCIAL SECTION

Technology Partner Name		Date of Evaluation	
Name of the Evaluator		SBU Name	
Partner Country Name		Solution Offered	

DESCRIPTON OF THE SOLUTION OFFERED BY THE PARTNER

- (Functionality)
- (Target Market)
- (Any other relevant Details)

CLIENT PORTFOLIO

- (Number of Successful deployments) – Provide the number for Africa and Rest of the World
- (Number of current operational sites) - Provide the number for Africa and Rest of the World
- (List of top 10 Customers with approximate project value for each of these)
- (Client Portfolio breakdown between Private and Public Sector)
- (Distribution of Clients across various verticals)

TECHNICAL DESCRIPTION

- (Technology Platform)
- (Solution Architecture)
- (Integration Capabilities)
- (Product Features)

TECHNICAL STRENGTH

- (Total number of technical resources)
- (Level of Customization needed)
- (Stability of the Product/Technology)

LEGAL EXPOSURE

- (Is the Solution directly linked to the Revenue Generating ability of the Client) If yes, describe how?
- (Will a downtime severely constrain the normal business operations of the Client) If yes, describe how?
- (Is a lot of third party data exposed to the Solution)

PROPOSED PARTNERSHIP

- (Describe the proposed Partnership Model For eg. Opportunity specific of overall engagement, JV or Prime Sub relation etc.
- (Does the Partner have a specific licensing policy for end users) If yes, is the policy easily enforceable?
- (Knowledge transfer plan including approximate costs involved, if any)
- (Access to Source)
- (Restrictions on end user pricing)
- (Are there any minimum targets set by the Partner)

(Are there any restrictions on the Geographies to be covered by us)

ANY OTHER INFORMATION THAT CAN HELP WITH THE EVALUATION

[Achievements, accomplishments, and responsibilities]

[Achievements, accomplishments, and responsibilities]

[Achievements, accomplishments, and responsibilities]

FINANCIAL STABILITY OF THE PARTNER (TO BE COMPLETED BY FINANCE)

APPENDIX III - THIRD PARTY DUE DILIGENCE FORM

(To be filled by the Business Function)

This 'third party due diligence form' ⁷ needs to be filled by the Strategic Business Unit for all third parties. The Strategic Business Unit needs to ensure that the rationale for engaging the third party is established. Note: Do not leave any section Blank. Mention 'N/A' where Not Applicable.

Company Initiator		Third party	
Name:		Name:	
Designation:		Contact Person:	
Function:		Phone:	

Risk Categorization	
Low Risk	High Risk

Question	Yes/ No	Comments (If any)
Are the company's structure and the owners of the third party known?		
Is the detailed invoicing/site address of the third party known?		
Are the banking & other related details obtained from the third party?		
Are the independent references about the third party available?		
Are the key contact person who will work with Techno Brain identified?		
Does the third party have the right qualification & experience for the services ?		
Does the third party plan to use Subcontractors or individuals other than their own employees to perform services?		
Are there any conflicts disclosed by the third party or Identified by Techno Brain?		
Has the Supplier Code of Conduct been shared with the third party?		

⁷ Refer the 'Guidance on third party due diligence' to learn How to Risk Categorize a third party Section I: Basic due diligence (Low Risk & High Risk third parties)

The following questions should be answered for a Low Risk & High Risk third party. Review responses of the third party before answering questions below (Questionnaire for Third Party/Assurance confirmation).

Has the third party signed the Assurance Confirmation for Anti- Corruption Compliance?		
Does the third party have adequate controls in place (e.g. trainings and compliance programs etc.)?		
Has the third party self-disclosed any integrity issues?		
Will the amount of compensation be consistent with the third party services and not beyond the Fair Market Value?		

Section II: In-depth due diligence (High Risk third parties)

The following questions should be additionally answered for a High Risk third party (Not applicable for Low Risk third party). Review the Independent assessment report (in-depth due diligence results) before answering questions below.

Question	Yes/ No	Comments (If any)
Financial Risk: Are there any financial risks identified from the in- depth due diligence?		
Supply Risk: Are there any supply risks identified from the in-depth due diligence?		
Quality Risk: Are there any quality risks identified from the in-depth due diligence?		
Legal Risk: Are there any Legal risks identified from the in-depth due diligence?		
Sustainability Risk: Are there any Sustainability risks identified from the in-depth due diligence?		
Intellectual Property Risk: Are there any Intellectual Property risks identified from the in-depth due diligence?		
Reputational Risk: Are there any Reputational risks identified from the in-depth due diligence?		

Section III: Red Flags (Low Risk & High Risk third parties)

The 'Red Flags' identified if any during the due diligence process should be listed along with actions taken (if any) to resolve the same.

Red Flags*		Resolution	
Sr. No.	Details	Type	Details
		<Accept> or	
		<Mitigate> or	
		<Avoid>	

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*Refer the 'Guidance on third party Due Diligence' to learn 'What Constitutes a Red Flag'.

Section IV: Decision of Strategic Business Unit (For Low Risk & High Risk third party)

Business Decision	
Selected	Rejected

Supporting Documents Attached	Yes/ No	Comments (If any)
Vendor master form		
Questionnaire for third party		
Assurance confirmation for anti-corruption compliance		
In-depth due diligence results		
Email acknowledgment for XYZ Company supplier code of conduct		

Reviewer	
Name:	
Designation:	
Date: Due Diligence Completion Date*	
Signature:	

*This third party due diligence will be considered valid for two years from this date.

Note: Any due diligence that has been completed may later be used by the same or other Business Units, provided that (i) the due diligence is not older than 2 years, and (ii) there is no changes in ownership or entity structure of the third party (iii) no Red Flags have been identified since due diligence was last completed.

APPENDIX IV - SUGGESTED TEMPLATE FOR MONITORING

(To be filled by the Business Function)

In absence of a standard template, the Strategic Business Unit may use this template to document the evidence/outcome of the monitoring.

Name of the third party:		Type:	<High Risk> or <Low Risk>
Due diligence Start Date:		Due diligence End Date:	
Monitoring Date:		Monitored by:	

Topic	Monitoring Observations	Attach Supporting (If any)

Concluding Remarks

Reviewer	
Name	
Designation	
Function	
Date	
Signature	

APPENDIX V – HIGH RISK OR RED FLAG THIRD PARTY ENGAGEMENT APPROVAL FORM

(To be filled by the Business Function)

This form is to provide a Go/No-Go decision to engage a Third Party identified as High Risk or with Red Flags as per the Third Party Due Diligence Form.

Note: Do not leave any section Blank. Do not mention Not Applicable 'NA'.

Third Party		TBG Contact Person	
Organization/ Individual Name:		Name:	
Organization Representative Name:		Designation:	
Phone:		Phone:	
Email:		Email:	

As per the risk categorization and red flags information provided in the Third Party Due Diligence Form, below is the business decision regarding partnership with the above mentioned Third Party.

Business Decision	
Approve	Reject

Reasons for approval or rejection

Next steps or actions to take for the Third Party with high risk or red flags

Approvals and Authorizations

SBU Head		Compliance Officer	
Name:		Name:	
Designation:		Designation:	
Date:		Date:	
Email:		Signature:	