

Due Diligence Checklist

Appendix 1

Tick (✓) whether **YES** or **NO** on the Due Diligence Checklist below. If you have answered **YES** to any of the statements, please provide explanations to support your assessment. Where the assessment cannot be reasonably determined, the assessor should indicate such constraint under the Cannot Be Determined (“**CBD**”) column.

Note: This Due Diligence Checklist should be completed prior to your engagement with the Business Associates.

No	Due Diligence Checklist	Yes	No	CBD
Business Associate as Supplier/Vendor/Contractor/Consultant or Customer				
1	<p>There has been difficulty in obtaining the required information from the Business Associate.</p> <p>a) For supplier/vendor/contractor/consultant – difficulty to obtain key information required in the New Supplier Registration Form.</p> <p>b) For customer – difficulty to obtain key information required under Know Your Customer (“KYC”) form such as customer registration form.</p> <p>If yes, please provide explanations:</p> <p>_____</p> <p>_____</p> <p>_____</p>			
2	<p>There are concerns or evidence of corruption (conviction) in respect of the Business Associate.</p> <p>If yes, please provide explanations:</p> <p>_____</p> <p>_____</p> <p>_____</p>			
3	<p>There is history of conviction on corruption activity against the Business Associate or any of its employees (base on search portal i.e. MACC or equivalent in respective site operation jurisdictions).</p> <p>If yes, please provide explanations:</p> <p>_____</p> <p>_____</p> <p>_____</p>			
4	<p>There is evidence of bribery and corruption related news (found in public domain i.e. Google search) to the Business Associate.</p> <p>If yes, please provide explanations:</p> <p>_____</p> <p>_____</p> <p>_____</p>			

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5	<p>The Business Associate is being associated with disreputable suppliers/ subcontractors etc. base on market available information.</p> <p>If yes, please provide explanations:</p> <p>_____</p> <p>_____</p> <p>_____</p>																			
6	<p>The selected Business Associate during competitive sourcing or single sourcing is quoting a significantly higher prices for their goods and/or services compared to it's competitor.</p> <p><i>(Note: A company paying bribes may often charge more for its good and/or services in order to create a slush fund to pay bribes)</i></p> <p>If yes, please provide justifications for the selection:</p> <p>_____</p> <p>_____</p> <p>_____</p>																			
7	<p>For recurring Business Associate (with past transaction history that has lapsed for more than a year with the company) has a past record history of requesting significant advance payment or requested urgent payments.</p> <p>If yes, please provide explanations:</p> <p>_____</p> <p>_____</p> <p>_____</p>																			
Business Associate as a Public Official																				
8	<p>The owners, directors, shareholders, officers or any employees of the Business Associate being current or former Public Officials.</p> <p>If yes, please provide following details:</p> <table border="1" style="width: 100%;"> <tr> <td style="width: 20%;">Name:</td> <td></td> </tr> <tr> <td>Title:</td> <td></td> </tr> <tr> <td>Position:</td> <td></td> </tr> <tr> <td>Relationship:</td> <td></td> </tr> </table> <table border="1" style="width: 100%;"> <tr> <td style="width: 20%;">Name:</td> <td></td> </tr> <tr> <td>Title:</td> <td></td> </tr> <tr> <td>Position:</td> <td></td> </tr> <tr> <td>Relationship:</td> <td></td> </tr> </table>	Name:		Title:		Position:		Relationship:		Name:		Title:		Position:		Relationship:				
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Business Associate's Dealing with Public Official																				
9	<p>Does the Business Associate (either directly or through any operating entity) have any Public Official, government agencies or government related customers or suppliers.</p> <p>If yes, please provide following details:</p> <table border="1"> <tr><td>Name:</td><td></td></tr> <tr><td>Title:</td><td></td></tr> <tr><td>Position:</td><td></td></tr> <tr><td>Relationship:</td><td></td></tr> </table> <table border="1"> <tr><td>Name:</td><td></td></tr> <tr><td>Title:</td><td></td></tr> <tr><td>Position:</td><td></td></tr> <tr><td>Relationship:</td><td></td></tr> </table>	Name:		Title:		Position:		Relationship:		Name:		Title:		Position:		Relationship:				
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10	<p>The Business Associate is recommended by a Public Official as preferred supplier under contract/supply agreement to be established with the company.</p> <p>If yes, please provide following details:</p> <table border="1"> <tr><td>Name:</td><td></td></tr> <tr><td>Title:</td><td></td></tr> <tr><td>Position:</td><td></td></tr> <tr><td>Relationship:</td><td></td></tr> </table> <table border="1"> <tr><td>Name:</td><td></td></tr> <tr><td>Title:</td><td></td></tr> <tr><td>Position:</td><td></td></tr> <tr><td>Relationship:</td><td></td></tr> </table>	Name:		Title:		Position:		Relationship:		Name:		Title:		Position:		Relationship:				
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11	<p>The owners, directors, shareholders, officers or any employees of the Business Associate have personal, familial or any associations with Public Officials.</p> <p>If yes, please provide following details:</p> <table border="1"> <tr><td>Name:</td><td></td></tr> <tr><td>Title:</td><td></td></tr> <tr><td>Position:</td><td></td></tr> <tr><td>Relationship:</td><td></td></tr> </table> <table border="1"> <tr><td>Name:</td><td></td></tr> <tr><td>Title:</td><td></td></tr> <tr><td>Position:</td><td></td></tr> <tr><td>Relationship:</td><td></td></tr> </table>	Name:		Title:		Position:		Relationship:		Name:		Title:		Position:		Relationship:				
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Actions	Name	Position	Signature	Date
Prepared by :				
Verified by :	1.			
	2.			
Approved by :				

Guidance Notes:

1. Due diligence shall only be carried out for Business Associates assessed to be of higher exposure group as follow:-

Higher Exposure Group	Defination
Public officials	An official of any governments, government agencies or any regulatory, statutory or administrative bodies, whether local or foreign.
Business Associate	A third party with whom LEGB Group has, or plans to establish, some form of business relationship. This may include customers, suppliers, vendors, distributors, contractors, subcontractors, outsourced service providers (e.g. consultants, advisers, solicitors, agents), lenders, representatives, introducers/ intermediaries, investors, joint venture partners and etc.

2. Signature

Procedures	Business Associate	
	Customer	Supplier/ Vendor/Contractor/Consultant
Prepared by	Business Development Department / Project Management Department	Procurement Department / Finance & Account Department / Human Resource & Admin Department
Verified by	1. Site FC/CFC – on Question 7 only 2. BDM / PM – on other remaining Questions Note: Both parties above are required to sign-off under the “verified by” column above	1. Site FC/CFC – on Question 7 only 2. Procurement / Finance & Account / Human Resource & Admin Manger – on other remaining Questions Note: Both parties above are required to sign-off under the “verified by” column above
Approved by	HOO / COO / CEO	HOO / COO / CEO