

Due Diligence questionnaire for subcontractors (DFID and other UK government department projects)

Name of organisation:			
Bid or project name:			
DFID Supply Partner Code of Conduct Compliance	□ 1	□ 2	□3
Level			

[Note: Insert correct Compliance Level for the organisation as confirmed in writing by that organisation]

This information is provided to assist Palladium in undertaking investigations into you or your organisation as part of prudent due diligence processes. Certain questions are asked with a view to assessing compliance with certain DFID standards.

DFID Compliance level 3 applies to contractors with an individual DFID-funded contract value or component of a contract funded by DFID with a value below the EU Threshold (£118,133 at December 2018). At this level, contractors are required to adhere to the overarching DFID Supply Partner Code of Conduct principles and recognise, mitigate and manage risks but are not required to comply with the specific KPIs set out in the declaration section of the Code of Conduct. You are asked to reply to all questions save where it is stated expressly that a question is not applicable to a level 3 contractor. You will not be disqualified from providing services on a DFID-funded programme if you do not fulfil all requirements (but may be asked to take steps to improve your level of compliance over an agreed period of time).

To the extent permitted by law, all information provided in this form will be held in confidence and not disclosed to any third parties without prior notice and approval. Note that answering 'no' to certain questions does not necessarily mean that you or your organisation will fail the due diligence process; it is paramount that the questions are answered truthfully.

The questionnaire is to be completed by the owner/shareholder, managing director or duly authorised director or trustee of the organisation.

Part 1 Identifying information

Section A – Organisation details

Name of organisation:	
Organisation headquarters address/main office (and registered office, if different):	
Country or countries where activities will take place:	
Website for organisation:	
Name and role/position of owner/managing director/managing trustee for the organisation:	
Name and role/position of person completing this questionnaire (if different from the person named above). Insert 'N/A' if there is no difference.	

Section B – Owner/Managing Director details

director/trustee of the organisation (As written on passport or national identification card) Insert the following details for the owner/managing director/trustee of the organisation and attach a copy of the bio-data page of passport or national identification card. Document attached is Home address for individual or owner/managing director, phone number and email address: Identity card / Nationality: Date of birth: passport number Email: Phone:				
Insert the following details for the owner/managing director/trustee of the organisation and attach a copy of the bio-data page of passport or national identification card. Document attached is Home address for individual or owner/managing director, phone number and email address: Identity card /				
the bio-data page of passport or national identification card. Document attached is Home address for individual or owner/managing director, phone number and email address: Identity card / Nationality: Date of birth: passport number				
Document attached is Home address for individual or owner/managing director, phone number and email address: Identity card / Nationality: Date of birth: passport number	f			
Home address for individual or owner/managing director, phone number and email address: Identity card / Nationality: Date of birth: passport number				
director, phone number and email address: Identity card / Nationality: Date of birth: passport number				
Identity card / passport number Nationality: Date of birth:				
passport number				
number				
Email: Phone:				
Part 2 Business and financial information Section A - Details				
Specify the nature of the organisation below: Sole Proprietorship □ Partnership □ Corporation □ Non Profit □ Other □				
If other, please specify:				
Is this organisation registered? If yes, please note the				
country and registration number				
Please supply a copy of the organisation's registration Attached/enclosed To follow within 2 days certificate.	.			
Is the entity an organisation listed on a public stock ☐ Yes ☐ No				
exchange? If yes, please provide relevant details				
below.				
If applicable, please list all parent companies (to the ultimate parent company level, and its shareholders), along with subsidiaries and related companies below. If there are none, state 'None':				
Please list the full names and date of birth of all				
Principals for your organisation.				
(Note: the term "Principal" includes, but is not limited				
to, the partners, directors, shareholders/owners,				
executive officers, trustees or others who exercise				
control over your organisation.				
Section B – Public Official				
Does any Public Official or government entity have ☐ Yes ☐ No				
any financial, management or controlling interest in				
your organisation? If yes, provide details and level of interest below:				
NOTE: "Public Official" means any person, whether elected or appointed who holds an executive, legislative,				
administrative or judicial office or position in any public entity, including any international agency. In addition,				
"Public Official" includes any person who performs public functions in any branch of the national, state, local				
or municipal government of any country or territory or who exercises a public function, by employment or				
under contract, for any public entity, agency or enterprise of such country or territory, including state owner	d			
or controlled enterprises. The definition of "Public Official" also includes any official of a political party or any				
candidate for political office.				
Please state whether the owner or				
main shareholder/managing term is defined above)				
director/trustee of the Is a close relative (i.e. mother,				
organisation: father, sister, brother, spouse or				
child) of a Public Official				
Please state whether: Your organisation employs a Current Public Official Yes No				

Any Principal of has a close rela Public Official	□ No	
For any person identified as a close relative above, p title, relationship to you or the organisation, and responsive controlled enterprise or company. If additional space	onsibilities for the government,	agency, or government
Section C – Taxes and finances		
Has the organisation failed to fulfil obligations relating to the payment of taxes and/or social security contributions under the law of the jurisdiction(s) in which it is established and in which it is operating? If yes, please provide details below.	☐ Yes ☐ No	
Please provide a copy of the audited accounts for the last financial year of the organisation.	☐ Attached/enclosed ☐ To	o follow within 2 days
Has the organisation had its statutory audited accounts (or its parent, ultimate parent or subsidiaries' accounts) qualified in any of the last 3 years? If yes, please provide details below.	☐ Yes ☐ No	
Section D – Prior performance and control systems	3	
Has the organisation had any contracts which have been terminated for poor performance or breach of contract terms within the last 3 years? If yes, please provide details below.	□ Yes □ No	
Does the organisation have in place written financial management processes and procedures? If 'yes', please provide an overview. If 'no', explain how the organisation ensures good financial management in its business	☐ Yes ☐ No 	
Does the organisation have in place written risk management processes and procedures? If 'yes', please provide a copy. If 'no', please explain how the organisation manages risks in its business.	☐ Yes ☐ No	
Does the organisation maintain a written Risk Register?	☐ Yes ☐ No	
Section E – Insurances		
Please supply evidence of the organisation's current public liability insurance policy and confirm the renewal date.		
Please also confirm that the public liability insurance covers the services to be provided in the country or countries where project services are to be provided.		
Please supply evidence of the organisation's professional indemnity insurance policy and confirm the renewal date.		
Please also confirm that the professional indemnity insurance covers the services to be provided in the country or countries where project services are to be provided		
Is the organisation able to provide travel insurance for all of the personnel who will be working on the project services to be provided including emergency heath and evacuation insurance cover	☐ Yes ☐ No	

for all personnel not working in their country of origin/current citizenship? If 'yes', please supply evidence of the policy and confirm the renewal date. If 'no', please explain why.		
Part 3 Governance		
Section A – Anti-corruption		
Does the organisation have a policy, code or	□ Yes	□ No
statement on anti-corruption and bribery that binds		
all of its personnel?		
If 'yes', please supply a copy of the policy or code		
and answer the following questions: Does the organisation provide training to personnel	□ Vaa	□ No
on this issue? Please supply details of any training	☐ Yes	□ No
provided.		
Does the organisation have a procedure for dealing	□ Yes	□ No
with suspected cases of corruption, fraud or		
bribery? Please supply details.		
Does the organisation have a whistle-blower	☐ Yes	□ No
policy? Please supply details.	•••	
If you have replied 'no' to any of the questions above, is the organisation planning to introduce	•••	
these measures and is the organisation interested		
in Palladium providing some assistance and useful		
information?		
Does the organisation impose and enforce its own	☐ Yes	□ No
standards of ethical behaviour on its contractors		
and suppliers? Please add details showing how this is achieved.		
is acmeved.		
Section B – Prior conduct		
Have you, any principals or any current employees	☐ Yes	□ No
or contracted personnel of your organization ever		
been investigated for, charged with, convicted or otherwise implicated in criminal, corrupt, unethical,		
or unlawful conduct?		
N.B. 'Principals' is defined in Part 2.		
Has the organisation, or any subsidiary or affiliate	☐ Yes	□ No
of your organisation ever been investigated for,		
charged with, convicted or otherwise implicated in		
criminal, corrupt, unethical, or unlawful conduct? Has the organisation ever been issued with a	□ V	
sanction or committed a violation of law or	☐ Yes	□ No
regulation?		
If you have replied 'yes' to any of the above, please		
describe the circumstances.		
Section C - Modern slavery and human trafficking		
Does the organisation have a policy, code or	□ Yes	□ No
statement on modern slavery/human trafficking?		
If 'yes', please supply a copy of the policy or code		
and answer the following questions:		
Does the organisation provide training to personnel	☐ Yes	□ No
on this issue? Please supply details of any training provided.		
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Does the organisation have a procedure for dealing with suspected cases of modern slavery or human trafficking issues? Please supply details.	☐ Yes ☐ No
If you have replied 'no' to any of the questions above, is the organisation planning to introduce such measures and is the organisation interested in Palladium providing some assistance and useful information?	
How does the organisation flow down its policy/code to its supply chain and what checks does the organisation undertake to check its suppliers in connection with this issue?	
Is the organisation required to issue a Modern Slavery Statement under the Modern Slavery Act 2015 (UK)? If 'yes', please supply the URL to the current statement.	☐ Yes ☐ No
Have any of the current employees or contracted personnel of the organisation ever been investigated for, charged with, convicted or otherwise implicated in incidents relating to Modern Slavery and Human Trafficking?	☐ Yes ☐ No
Has your organization dealt with any incidents related to modern slavery or human trafficking in the past? If any, did investigations and consequences follow?	☐ Incidents, see attachment ☐ No incidents
When answering this question please refer to the past 10 years of your organization's history.	
If you replied 'yes' please provide further information. You don't have to state any details of the incidents. You can answer this question by attaching a document in format of a table with the following contents: Financial year, type of incident, investigations followed (yes/no), consequences followed (yes/no).	
Section D - Child protection	
Do you have a Child Protection policy, code and/or guidelines in place? If yes, please provide a copy and answer these questions:	□ Yes □ No
Does the organisation provide training to personnel on this issue? Please supply details of any training provided.	☐ Yes ☐ No
Does the organisation have a procedure for dealing with suspected issues relating to child protection? Please supply details.	☐ Yes ☐ No
If you have replied 'no' to any part of this section, is the organisation planning to introduce these measures and is the organisation interested in Palladium providing some assistance and useful information?	
Have any of the current employees or contracted personnel of the organisation ever been investigated for, charged with, convicted or otherwise implicated in incidents relating to child protection?	☐ Yes ☐ No
Has your organization dealt with any incidents related to child protection? If any, did investigations	☐ Incidents, see attachment ☐ No incidents

and consequences follow?	
When answering this question please refer to the past 10 years of your organization's history.	
If you replied 'yes' please provide further information. You don't have to state any details of the incidents. You can answer this question by attaching a document in format of a table with the following contents: Financial year, type of incident, investigations followed (yes/no), consequences followed (yes/no).	
Section E – Sexual abuse/exploitation/harassment	
Do you have in place a policy, code and/or guidelines showing zero tolerance for any sexual abuse, exploitation or harassment (both within and outside of the work place and working hours)?	□ Yes □ No
If yes, please provide a copy and answer these questions:	
Does the organisation provide training to all personnel on this issue? Please supply details of any training provided.	☐ Yes ☐ No
Does the organisation have a procedure for dealing with suspected issues relating to sexual abuse, exploitation or harassment? Please supply details.	☐ Yes ☐ No
If you have replied 'no' to any of the questions above in this section E, is the organisation planning to introduce these measures and is the organisation interested in Palladium providing some assistance and useful information?	
Have any employees or contracted personnel of your organisation ever been investigated for, charged with, convicted or otherwise implicated in incidents relating to (sexual) exploitation, (sexual) abuse and (sexual) harassment (Serious Misconduct)?	□ Yes □ No
If any, what kind of incidents of Serious Misconduct has your organization dealt with in the past and did investigations and consequences follow?	☐ Incidents, see attachment ☐ No incidents
When answering this question please refer to the past 10 years of your organization's history.	
If you replied 'yes' please provide further information. You don't have to state any details of the incidents. You can answer this question by attaching a document in format of a table with the following contents: Financial year, type of incident, investigations followed (yes/no), consequences followed (yes/no).	

Section E - OHS

Does the organisation have an occupational health and safety (OHS) policy? If so, please attach a copy or provide details below.	☐ Yes ☐ No			
Section F – Support for initiatives				
Please confirm that the organisation is signed up to the UN Global Compact. Note: This is required by the DFID Supply Partner Code of Conduct.	☐ Yes ☐ No			
Note: Not required for Compliance Level 2 subcontractors unless Terms of Reference for the project require this; not required for level 3 subcontractors.				
If the organisation is not signed up to the UN Global Compact, please confirm that it will do this as soon as possible.	☐ Yes ☐ No			
Is the organisation a member of the Ethical Trading Initiative (ETI)? Note: This is required by the DFID Supply Partner Code of Conduct. Note: This membership is not currently required but will be required in the future when DFID agrees a form of membership with ETI. Note: Not required for Compliance Level 2 subcontractors unless Terms of Reference for the project require this; not required for level 3 subcontractors.	☐ Yes ☐ No 			
If the organisation is not a member of the ETI, please confirm that it will take immediate steps to become a member and to provide evidence of this to Palladium. Note: When membership can be offered, you will be required to become a member.	☐ Yes ☐ No			
Section G – Transparency				
Please confirm that the organisation will comply with the IATI rules on transparency if services are provided to Palladium. Note: This is required by the DFID Supply Partner Code of Conduct.	☐ Yes ☐ No 			
Note: Not required for Compliance Level 2 subcontractors unless the Terms of Reference for the project require this; not required for level 3 subcontractors.				
Part 4 Conflict of interest				
DFID's standard terms and conditions for Conflict of Interest are set out in section 54 of its Standard Terms and Conditions (Version 2 August 2018) [available at https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/734154 /Standard-Terms-Conditions-of-Contract-15August.pdf]. Please read section 54 (or equivalent section, if an earlier version of the DFID standard terms and conditions apply) and reply to the following questions:				
The organisation will be required to comply with section 54 if it enters into an agreement with Palladium. Does the organisation confirm that at	☐ Yes ☐ No 			

the present time, there is no potential, perceived or actual conflict of interest for the organisation and its personnel in relation to the proposed services with either the UK Government (whether DFID, the FCO or other) or Palladium? If 'no' please provide details.		
Does the organisation have a policy or code on Conflict of Interest? If 'yes', please supply a copy of the policy or code and answer the following questions:	☐ Yes 	□ No
Does the organisation provide training to personnel on this issue? Please supply details of any training provided.	☐ Yes 	□ No
Does the organisation have a procedure for dealing with suspected cases of conflict of interest? If 'yes', please supply a copy.	☐ Yes 	□ No
If you have replied 'no' to any of the 2 nd to 4th questions above, is the organisation planning to introduce these measures and is the organisation interested in Palladium providing some assistance and useful information? Note: Not required for compliance level 3 subcontractors.		
Please confirm that the organisation understands that it should not contract any person to work on any DFID tender or programme who has been employed by DFID or the Crown during the previous period of two years without first informing Palladium and obtaining Palladium's approval (and that of DFID, where appropriate).		

Part 5 Data security

DFID's standard terms and conditions for data security are set out in sections 26 to 33 of the Standard Terms and Conditions (or equivalent section if an earlier version of the DFID terms and conditions). Please read these sections and reply to the following questions:		
The organisation will be required to comply with sections 26 to 33 if it enters into an agreement with Palladium. Does the organisation confirm that it can and will comply with these requirements if it enters into an agreement with Palladium? If it cannot confirm for any part of sections 26 to 33, please provide details.	☐ Yes 	□ No
Does the organisation have data security measures in place to prevent unauthorised access to confidential information? These measures may include technical measures (i.e. computer systems) and policy/process measures (e.g. restricting access to information to certain individuals). Please provide a high level summary of measures in place.	□ Yes 	□ No
Please confirm that the organisation's systems are in accordance with the HMG Cyber Essentials Scheme. If the organisation is a member of the scheme, please supply a copy of the organisation's award. Note: Not required for Compliance Level 3 subcontractors.		
Please confirm that, where any services provided by the organisation are part of a project with a		

	digital element, the organisation will adhere to the				
	global Principles for Digital Development – see www.digitalprinciples.org				
	www.digitalprinciples.org				
	Note: Not required for Compliance Level 2				
	subcontractors unless Terms of Reference for the				
	project require this; not required for level 3				
-	subcontractors.				
	DFID and Palladium require a high standard of data p	orote	ection ar	nd privacy for personal data proces	ssed by
ŀ	subcontractors Does your organisation have a privacy / data		Yes	□ No	
	protection policy? If yes, please provide a copy.	_	162		
L	protection period: It yees, produce provide a copy.	• • • •			
	Part 6 Procurement				
	Does the organisation have policies and procedures		Yes	□ No	
	controlling any procurement of goods and services				
	by the organisation (including the recruitment of				
	personnel)? Please supply details.				
ŀ	Is the organisation able to comply with DEID		Vaa	□ No	
	Is the organisation able to comply with DFID requirements for the procurement of equipment as		Yes	□ No	
	set out in the DFID standard T&Cs, sections 10 and				
	11?				
	Part 7 Recruitment and employment pr				
	Is the organisation fully compliant with all laws and regulations relating to recruitment and employment		Yes	□ No	
	of personnel in both the organisation's country of				
	registration and (if different) the country or	•••			
	countries where services are to be provided by the				
	organisation (including compliance with all				
	immigration requirements (visas and work permits				
	for international personnel))? If you have answered 'no', please provide an				
	explanation and confirmation of how the				
	organisation is working towards full compliance.				
ľ	Please confirm that the organisation will not use				
	any employment agency or assistance which				
-	charges fees to prospective personnel.				
	Where the organisation is to provide services in a		Yes	□ No	
	country other than the country of its registration, is the organisation registered to operate in such				
	country or countries?				
	If 'yes', list details of such registrations opposite				
	and provide copies of the registration documents.				
	If 'no', please explain how the organisation will				
	operate in such country or countries in full				
-	compliance with all local laws.				
	Please summarise the due diligence undertaken by				
	the organisation for all employees, consultants and contractors including the steps taken to ensure all				
	those contracted practice high ethical standards of				
	behaviour.				

Part 8 – Environmental safeguards

Does the organisation have a policy relating to environmental safeguards and sustainability? If 'yes' please provide details.	☐ Yes 	□ No		
It is a requirement of DFID that the organisation maintains a risk register identifying environmental risks in relation to the services to be provided in order to ensure that all relevant legislative requirements are complied with and to report on this issue at least annually. Please confirm that the organisation can and will comply with this requirement. Note: Not required for compliance level 2 contractors unless Terms of Reference for the project require this; not required for level 3 contractors.	□ Yes 	□ No		
If the organisation is a member of or a signatory of any relevant Codes (conventions, standards or certification bodies), please provide details (or insert 'None')				
Part 9 Sub-subcontractors				
Subcontracting your responsibilities under a subcontract is not permissible without Palladium's consent and (in some cases) consent from Palladium's client. Do you intend to seek consent to appoint sub-subcontractors during the proposed period of performance? If 'yes' please provide details. Your provision of this list does not infer approval by Palladium or its client for sub-contracting at this point.	□ Yes 	□ No		
Part 10 Additional disclosures				
Please provide any additional information below that would assist Palladium in performing its due diligence review				
Part 11 Documents enclosed				
List here all the documents that will be attached to or included with the answers to this questionnaire.				
Part 12 Certification and Data Protection				
I hereby certify that:				
To the best of my knowledge, all information in this re	esponse is truthf	ul, correct and complete;		
I am familiar with the requirements of these statutes: • Bribery Act 2010				
Modern Slavery Act 2015Official Secrets Acts 1911 to 1989				

I have read the definition of Public Official in Part 2 and declare that neither I, nor any of my immediate family members, nor any of the personnel of the subject of this due diligence (if I am providing this declaration for an organisation), are Public Officials, except as previously disclosed.

I, or my organisation or its staff, have never paid, approved for payment or otherwise provided, directly or indirectly, anything of value to a Public Official for any improper, corrupt or illegal purpose, nor will I or the organisation and its staff do so; and I have never created a false invoice or otherwise manipulated documentation to disguise making a payment or otherwise providing anything of value to a Public Official for any purpose, nor will I or the organisation or its staff do so.

I hereby acknowledge that I have been informed by Palladium that it may seek to obtain an investigative report that will include personal information regarding me (or my organisation, if this form relates to an organisation I represent), including but not limited to, work references, capabilities/educational and work history, and personnel criminal convictions or arrest records if allowed, in order to assist Palladium in determining whether it can enter into an agreement with me or my organisation. I hereby consent to Palladium conducting this investigation and obtaining such reports as may be provided to Palladium by other firms subcontracted for the purpose.

I further hereby acknowledge that I have reviewed the Palladium <u>Business Partner Code of Conduct</u> and also the DFID Supply Partner Code of Conduct and I, and my organisation, will comply with all requirements set out in such Codes as they apply to my organisation.

Data Collection Notice

In completing this form for an organisation (whether a company, trust, charity or similar), you acknowledge that you have obtained consent to the following from the relevant individuals.

Palladium is committed to the protection of personal information and compliance with relevant data protection and privacy laws. The information requested by this form is collected directly from you to assess your suitability, or that of a relevant individual, to provide services to Palladium, its clients and/or any of its projects. The information we will collect pursuant to this due diligence exercise is as outlined in this form, but we may also obtain information through an investigative report, which may draw on public registers, interviews or public media. We collect this information on the legal basis of your consent, and then will later use it for the performance of any contract with you or for the performance of any relevant contract with our clients.

This information may be shared with any of Palladium's related companies or relevant clients where such sharing is a) required by a relevant law, our contract with you or with our clients; or b) permitted by a relevant data protection law. Where sharing is with related companies, such related companies will comply with Palladium data protection guidelines.

This information may be provided to our offices/related companies overseas, subject to such overseas offices/related companies being bound by the same data protection standards as the office or company to which you provide the information and provided also that such transfer of information is required as part of fulfilling the purpose of or reasons for the provision of the information, or for the performance of any subsequent contract. An example of this might be that the relevant decision maker or individual involved in the decision is based in another location. Further details are available at http://thepalladiumgroup.com/legal/our-policies.

The information you provide will be used to a) make an informed assessment about whether Palladium can enter into an agreement with you or your organisation, b) manage your contract and services with Palladium in the event we enter into an agreement with you, or c) assess certain internal diversity and inclusion metrics. If you do not provide your data or consent to processing by us then we cannot assess your suitability to enter into a contract with you.

Depending on your country of residence, you may have certain data protection or privacy rights. You can find details, including our retention guidelines, at http://thepalladiumgroup.com/legal/our-policies. Privacy or data protection gueries can be directed to Privacy@thepalladiumgroup.com

Signature:	

Name:	
Title/Position:	
Date:	