

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 Level	<input type="checkbox"/> 1 <input type="checkbox"/> 2 <input type="checkbox"/> 3

[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.

Please provide answers to and information regarding all of the questions below. 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

Full legal name of the owner/managing 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 / passport number	...	Nationality:	...	Date of birth:	...
Email:	...	Phone:		...	

Part 2 Business and financial information

Section A - Details

Specify the nature of the organisation below:				
Sole Proprietorship <input type="checkbox"/>	Partnership <input type="checkbox"/>	Corporation <input type="checkbox"/>	Non Profit <input type="checkbox"/>	Other <input type="checkbox"/>
If other, please specify:		...		
Is this organisation registered? If yes, please note the country and registration number		<input type="checkbox"/> Yes	<input type="checkbox"/> No	
Please supply a copy of the organisation's registration certificate.		... <input type="checkbox"/> Attached/enclosed <input type="checkbox"/> To follow within 2 days		
Is the entity an organisation listed on a public stock exchange? If yes, please provide relevant details below.		<input type="checkbox"/> Yes	<input type="checkbox"/> No	
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 any financial, management or controlling interest in your organisation? If yes, provide details and level of interest below:		<input type="checkbox"/> Yes	<input type="checkbox"/> No	
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 owned 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 director/trustee of the organisation:	Is a current Public Official (as that term is defined above)	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	Is a close relative (i.e. mother, father, sister, brother, spouse or child) of a Public Official	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
Please state whether:	Your organisation employs a current Public Official	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
	Any Principal of your organisation has a close relative who is a Public Official	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
For any person identified as a close relative above, please provide their name (surnames and given name), title, relationship to you or the organisation, and responsibilities for the government, agency, or government controlled enterprise or company. If additional space is needed, attach a separate sheet of paper. ...				

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.	<input type="checkbox"/> Yes <input type="checkbox"/> No ...
Please provide a copy of the audited accounts for the last financial year of the organisation.	<input type="checkbox"/> Attached/enclosed <input type="checkbox"/> To 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.	<input type="checkbox"/> Yes <input type="checkbox"/> No ...

Section D – Prior performance and control systems

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.	<input type="checkbox"/> Yes <input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> 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.	<input type="checkbox"/> Yes <input type="checkbox"/> No ...
Does the organisation maintain a written Risk Register?	<input type="checkbox"/> Yes <input type="checkbox"/> 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 health and evacuation insurance cover 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.	<input type="checkbox"/> Yes <input type="checkbox"/> No ...

Part 3 Governance

Section A – Anti-corruption

Does the organisation have a policy, code or 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:	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Does the organisation provide training to personnel on this issue? Please supply details of any training provided.	<input type="checkbox"/> Yes ...	<input type="checkbox"/> No
Does the organisation have a procedure for dealing with suspected cases of corruption, fraud or bribery? Please supply details.	<input type="checkbox"/> Yes ...	<input type="checkbox"/> No
Does the organisation have a whistle-blower policy? Please supply details.	<input type="checkbox"/> Yes ...	<input type="checkbox"/> No
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 standards of ethical behaviour on its contractors and suppliers? Please add details showing how this is achieved.	<input type="checkbox"/> Yes ...	<input type="checkbox"/> No

Section B – Prior conduct

Have you (or any Principals of your organisation) 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.	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Has the organisation, or any subsidiary or affiliate of your organisation ever been investigated for, charged with, convicted or otherwise implicated in criminal, corrupt, unethical, or unlawful conduct?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Has the organisation ever been issued with a sanction or committed a violation of law or regulation?	<input type="checkbox"/> Yes	<input type="checkbox"/> No
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 statement on modern slavery/human trafficking? If 'yes', please supply a copy of the policy or code and answer the following questions:	<input type="checkbox"/> Yes	<input type="checkbox"/> No
Does the organisation provide training to personnel on this issue? Please supply details of any training provided.	<input type="checkbox"/> Yes ...	<input type="checkbox"/> No
Does the organisation have a procedure for dealing with suspected cases of modern slavery or human trafficking issues? Please supply details.	<input type="checkbox"/> Yes ...	<input type="checkbox"/> 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	<input type="checkbox"/> Yes <input type="checkbox"/> 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:	<input type="checkbox"/> Yes <input type="checkbox"/> No
Does the organisation provide training to personnel on this issue? Please supply details of any training provided.	<input type="checkbox"/> Yes <input type="checkbox"/> No ...
Does the organisation have a procedure for dealing with suspected issues relating to child protection? Please supply details.	<input type="checkbox"/> Yes <input type="checkbox"/> 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?	...

Section E – OHS

Does the organisation have an occupational health and safety (OHS) policy? If so, please attach a copy or provide details below.	<input type="checkbox"/> Yes <input type="checkbox"/> No ...
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Section F – Support for initiatives

Please confirm that the organisation is signed up to the UN Global Compact. <i>Note: This is required by the DFID Supply Partner Code of Conduct.</i> <i>Note: Not required for Compliance Level 3 subcontractors.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No
If the organisation is not signed up to the UN Global Compact, please confirm that it will do this as soon as possible.	<input type="checkbox"/> Yes <input type="checkbox"/> No ...
Is the organisation a member of the Ethical Trading Initiative (ETI)? <i>Note: This is required by the DFID Supply Partner Code of Conduct.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> 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.	<input type="checkbox"/> Yes <input type="checkbox"/> No ...

Section G – Transparency

Please confirm that the organisation will comply with the IATI rules on transparency if services are provided to Palladium. <i>Note: This is required by the DFID Supply Partner Code of Conduct.</i>	<input type="checkbox"/> Yes <input type="checkbox"/> No ...
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Note: Not required for Compliance Level 3 subcontractors

Part 4 Conflict of interest

<p>DFID's standard terms and conditions for Conflict of Interest are set out in section 51 of its Standard Terms and Conditions (Version 1.1 October 2017) [available at https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/657021/DFID-Standard-Terms-Conditions-Services-Contract.pdf]. Please read section 51 and reply to the following questions:</p>	
<p>The organisation will be required to comply with section 51 if it enters into an agreement with Palladium. Does the organisation confirm that, at 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.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No ...
<p>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:</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No ...
<p>Does the organisation provide training to personnel on this issue? Please supply details of any training provided.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No ...
<p>Does the organisation have a procedure for dealing with suspected cases of conflict of interest? If 'yes', please supply a copy.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No ...
<p>If you have replied 'no' to any of the above questions, is the organisation planning to introduce these measures and is the organisation interested in Palladium providing some assistance and useful information?</p>	...
<p>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).</p>	...

Part 5 Data security

<p>DFID's standard terms and conditions for data security are set out in sections 25 to 32 of the Standard Terms and Conditions. Please read these sections and reply to the following questions:</p>	
<p>The organisation will be required to comply with sections 25 to 32 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 25 to 32, please provide details.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No ...
<p>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.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No ...

<p>Please confirm that the organisation complies in full with the HMG Cyber Essentials Scheme and supply a copy of the organisation's award.</p> <p><i>Note: Not required for Compliance Level 3 subcontractors</i></p>	...
<p>If the organisation does not have the Cyber Essential Scheme award, please confirm that it will obtain this as quickly as possible.</p>	...
<p>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</p> <p><i>Note: Not required for Compliance Level 3 subcontractors</i></p>	...

Part 6 Procurement

<p>Does the organisation have policies and procedures controlling any procurement of goods and services by the organisation (including the recruitment of personnel)? Please supply details.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No ...
<p>Is the organisation able to comply with DFID requirements for the procurement of equipment as set out in the DFID standard T&Cs, sections 10 and 11?</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No ...

Part 7 Recruitment and employment practices

<p>Is the organisation fully compliant with all laws and regulations relating to recruitment and employment 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))?</p> <p>If you have answered 'no', please provide an explanation and confirmation of how the organisation is working towards full compliance.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No ...
<p>Please confirm that the organisation will not use any employment agency or assistance which charges fees to prospective personnel.</p>	...
<p>Where the organisation is to provide services in a country other than the country of its registration, is the organisation registered to operate in such country or countries?</p> <p>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.</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No ...

Part 8 – Environmental safeguards

Does the organisation have a policy relating to environmental safeguards and sustainability? If 'yes' please provide details.	<input type="checkbox"/> Yes ...	<input type="checkbox"/> 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.	<input type="checkbox"/> Yes ...	<input type="checkbox"/> 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.	<input type="checkbox"/> Yes ...	<input type="checkbox"/> No
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Part 10 Additional disclosures

Please provide any additional information below that would assist Palladium in performing its due diligence review	...
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Part 11 Documents enclosed

List here all the documents that will be attached to or included with the answers to this questionnaire.	...
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Part 12 Certification

<p>I hereby certify that:</p> <p>To the best of my knowledge, all information in this response is truthful, correct and complete;</p> <p>I am familiar with the requirements of these statutes:</p> <ul style="list-style-type: none"><input checked="" type="checkbox"/> Bribery Act 2010<input checked="" type="checkbox"/> Modern Slavery Act 2015<input checked="" type="checkbox"/> Official Secrets Acts 1911 to 1989 <p>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.</p> <p>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</p>

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 Business Partner Code of Conduct 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.

Signature:	
Name:	...
Title/Position:	...
Date:	...