

Human Appeal Global Due diligence process

In line with the global sanctions policy & The Anti-Money Laundering policy, Human appeal **MUST** complete due diligence all external/internal relations. This includes

- **Employees**
 - **Contractors**
 - **Volunteers (specific)**
 - **Interns**
 - **Vendors/suppliers (Sole traders included)**
 - **Artists, Qari's, speakers**
 - **Third parties**
 - **High donor's**
 - **Partner's**
1. Due diligence **MUST** be completed **PRIOR** to agreeing all external/internal relations (Paid or unpaid)
 2. Due diligence **MUST** be completed annually for all vendors/partners/third parties/Individuals that we have a continuous relationship with
 3. Clear audit trail must also be kept. Central tracker and individual folders containing all documents must be kept
 4. Requests where the individual/organisation need adding on AMS, should only come from procurement (Josh/Basil/Steve)
 5. Programs departments are responsible for ensuring Due diligence is completed for FO relations
 6. P&C are responsible for ensuring Due diligence is completed for all employee's

Documents required:

- 1. Entity (Suppliers, vendors, partners or other organisation we may work with)**
 - Screening request form
 - Completed due diligence form or partnership appraisal form
- 2. Individual (Sole traders, employee, Sole traders, artists, Qari's)**
 - Screening request form
 - Form of ID (In some cases ID will be in another language, this can be accepted, however we must ensure were are getting it translated by appropriate staff)

Process

1. Screening request form with required additional document is to be sent over to Compliance officer
2. Compliance will complete Due diligence checks using Thomson Reuter's and send a response. Response time frame is ASAP, however can sometimes be delayed due to any risks found

Categorising reports found on Thomson Reuter's

All reports/risks found by Thomson Reuters are categorised by risk level (Low, Medium, High). As all reports are not the same, there is no set decision/approach documented for each risk level.

Where no risks are recognised

Where no reports/risk have been found, Compliance will approve and applicable department/employee will finalise contracts and begin relationship/work.

All continuous relations will require annual due diligence

Where risk is recognised

Determining risk level

Low Risk – Where reports have been found, however pose no risk to Human Appeal

Medium & High risk – Where compliance categorises an individual or entity as low or medium risk, decision is to be made at BoD or CEO level. Compliance will communicate and record decision of approval or decline.