
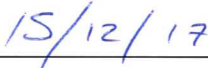


Summary

The attached due diligence policy replaces the vetting policy promulgated in 2014. It provides the framework for a more effective due diligence process to enable UNRWA to screen potential alliances with private partners that involve financial or in-kind contributions to the Agency. It will be reviewed on an interim basis in June 2018.

Recommendations to CG

Approve / Not Approve

<p>Approve the 2017 Due Diligence Policy for implementation</p>	<p> _____ Pierre Krähenbühl Commissioner-General  _____ Date</p>
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1. Background

As UNRWA fields and National Committees grow income through private sector fundraising channels, there is a growing need to ensure that the organisation continues to work effectively with a larger and more diverse portfolio of private partners, while at the same time guaranteeing that these partnerships do not damage the Agency's credibility or reputation in any way or compromise its ability to fulfil its mission.

To this end, this policy provides the framework for an efficient and transparent due diligence process to enable the Agency to screen potential alliances with private partners that involve financial or in-kind contributions to the Agency. This policy also provides for periodic review of existing private partnerships. It replaces the old Vetting Policy promulgated in 2014 and includes annexes that detail workflow, the screening template and the research process.

The policy is based on international best practice in this area, including from sister UN agencies, ensuring that standards and principles meet the internal requirements of the Agency, as well as UNRWA's particular needs for partnership evaluation.

2. Application

This policy applies to UNRWA, its partners, agents and other legal entities associated with the Agency, including National Committees. The policy governs all incoming contributions to UNRWA, including those involving the transfer of funds or in-kind contributions to the Agency

For the purposes of this policy, a "private partner" is defined as individuals, representatives of groups of individuals, and private sector entities, including without limitation foundations, companies, and non-governmental organisations. Given that the lines between state and non-state actors can be unclear in some parts of the world, this policy will be applied in any case where the potential partner is not unquestionably a state entity.

3. Objectives

This due diligence policy is designed to ensure that all contributions have a positive impact on the work of UNRWA, protect the best interests of the Agency and its mandate, and are entered into following a strict due diligence screening.

The objective of this due diligence process is three-fold:

- i. **To maximize UNRWA's opportunities for fundraising in an efficient, transparent and streamlined process:** This policy provides guiding principles, a screening process, workflows and assigns roles and accountabilities to key personnel in the organization to safeguard the Agency's reputation and ensure an efficient, transparent and accountable due diligence process.

- ii. **To ensure that UNRWA exclusively partners with entities that comply with high ethical and business practice principles:** Insufficient screening of new private partners could lead to organizational and/or reputational damage and indirect effects, such as the loss of confidence of partners or the compromising of the mission of the organisation.
- iii. **To ensure that the Agency does not partner with entities or individuals where legal obstacles exist:** The Agency may not enter into a partnership with an individual or entity, which is listed on the Consolidated United Nations Security Council Sanctions List ("UN Sanctions List"), as well as the UN suspended vendors list. Other legal issues may pose operational or reputational risks, such as pending legal proceedings. Therefore, the screening under this policy will ensure that no partnership is being entered where there are entries on the UN Sanctions List and or where legal or reputational issues are identified.¹

4. Working Principles

To achieve UNRWA's partnership screening objectives, the list below describes the key principles on which this due diligence policy is established. The screening process, showing the step-by-step implementation of these principles, is included in Annex I.

- i. **Varied screening and approval levels:** In addition to the basic screening of all partnerships against the relevant UN lists, different levels of screening and approval requirements will be applied depending on the value of the proposed contribution and the level of risk determined for that potential partner. In this way, lower value contributions can be processed in a systematic manner, and only high value contributions or those that pose higher potential reputational risk are taken through multiple screening and approval stages.

Screening and approval levels are determined by a combination of contribution value and risk classification:

a. Contribution values

- Under \$2,500: No official pre-screening by the Partnerships Division, however the names of partners (including individuals) will be run against the UN sanctions list regardless of the value or type of partnership. A limit of \$2,500 within a two-year period per partner is applied to a pre-screening exclusion. All contributions from individuals (cash or in-kind) will be screened automatically upon receipt. (See section 1b).

¹ See UNRWA Neutrality Framework, paragraph 97. For the relevant UN lists, see the Consolidated United Nations Security Council Sanctions List, available at http://www.un.org/sc/committees/consolidated_list.shtml, which includes the Consolidated List issued by the Security Council Committee established and maintained pursuant to Security Council resolutions 1267 (1999) and 1989 (2011).

- \$2,500 - \$1 Million: Screening varies on contribution level and risk. There are different screening levels required on partnerships valued between \$2,500 - \$100,000 and between \$100,000 and \$1 million depending on the Risk Classification determined by screening (See Section 1d below and Annex II).
- Over \$1 million: Expanded screening and approvals. Any potential contribution of over \$1 million will automatically classify for both a primary and secondary screening by the Partnerships Division and require legal assessment by the Department of Legal Affairs and final approval by the Chief of Staff.

All contribution values referenced in this policy should refer to both the current proposed amount and, in addition, to any other donations from the same source made during the last 24 months. For example, a partner that gave \$50,000 one year ago and is now proposing to give an additional \$100,000 should be evaluated as if the contribution were \$150,000. This is to ensure a partner giving multiple contributions over two years receives the necessary screening.

b. Screening stages

Due diligence screening is divided into mandatory, primary and secondary screening levels to achieve UNRWA's objective of safeguarding its reputation, efficiency and adequate use of resources. The details of what is evaluated in each screening level is included in Annex II, the Due Diligence Report Template. The objectives of each screening level are as follows:

- Mandatory Screening refers to screening all partners (individuals or otherwise) against the UN Sanctions Lists. This screening will be done automatically for individuals donating to UNRWA through online or offline platforms (through the Salesforce database²) and pre-emptively for organizations wanting to make a financial or in-kind contribution by the Partnerships Division (for the latter, please refer as well to the In-Kind Contributions Policy).

In the event there is a confirmed match between a UN list and a (prospective) partner or individual, the Agency will not enter into a partnership with that prospective partner, or will cease or suspend the relationship with the existing partner or individual in accordance with the applicable partnership arrangement. Any monies deposited to UNRWA will be refunded to that the partner. The match of a partner to the UN lists will be accordingly noted in the Salesforce Database.

² Automatic screening not yet in place but should be operational by 2018.

- Primary Screening refers to the screening of all private partners (individuals or otherwise) who have given above the \$2,500 level. This screening verifies to what extent the potential partner passes all of UNRWA's Exclusionary Criteria (described below) and details necessary top-line background information.
- Secondary Screening is carried out only after a primary screening has been completed and when the policy workflow indicates this necessary. Secondary screening evaluates the partner's operations in further detail, as well as leadership, influence, social responsibility and public image.

Additional screenings can be requested at any point if there is a perception of reputational risk during the course of a partnership.

c. Review of existing partnerships

Once a contribution has been made, the Partnerships Division will conduct a "follow-up" screening of all current partners (with one exception detailed below) at six-month intervals from the last date of the previous screening.

Individuals who provide unarmarked cash or in-kind contributions will only receive a follow up screening if they are on the list of monthly supporters to the Agency or if their contributions exceed the \$2,500 minimum screening within a 24 month period. Otherwise, it will be assumed that once a cash or in-kind contribution below \$2,500 is made and allocated to an Agency funding source, that money will be considered spent and no further vetting against that individual's name will be required.

For private partners that undergo a follow up screening, the date of this screening will be tracked in the Salesforce Database, and for organizations, in particular, primary screening will be conducted as per the prescribed process.

In cases where public information comes to light that might compromise a partnership, the Partnership Division will initiate follow-up screenings as appropriate.

If the outcome of the follow-up screening is that the partnership should be discontinued / terminated or suspended, the Partnerships Division will immediately inform the Director of the External Relations and Communication Department, the Director of the Department of Legal Affairs and the Chief of Staff. Only the Executive Office will have the right to suspend the partnership and/or return/refund any contributions, in accordance with the donor agreement and in close collaboration with the other two departments. Depending on the

reason for the suspension/refund/return of contribution, the Partnerships Division will exercise caution when communicating this decision to the partner and will clear any communication in accordance with the terms of the partnership arrangement and in close collaboration with the Director of the External Relations and Communication Department, the Director of the Department of Legal Affairs and the Chief of Staff.

d. Risk Classifications

At each screening stage, the potential partner is assigned a Risk Classification that determines the next steps in the screening process. The classifications are as follows:

- Low Risk: Engagement can proceed. No significant risk factors found. Not on UN Consolidated Sanctions List.
- Medium Risk: Engagement poses some risk. Additional research or referral is necessary as prescribed in the due diligence process based on contribution amount.
- High Risk: The risk posed by association with this partner is sufficiently high that UNRWA shall not proceed with engagement.

Listing of the prospective partner or associated persons or entities on the Consolidated United Nations Security Council Sanctions List is grounds for immediate and mandatory automatic exclusion, as it presents a legal obstacle to entering into a partnership (and/or accepting a donation). UNRWA will be legally required to not proceed with the partnership, and any existing partnerships will need to be severed immediately upon identification of listing.

- ii. **Due Diligence Process Efficiency:** The Partnerships Division will ensure that a decision on each due diligence screening request is returned to the requesting party as prescribed in the workflow in Annex 1. For a primary screening, the response must be submitted within five business days from the full and complete submission of a Request for Screening. In the case that a contribution requires a secondary screening, the requesting party should be informed by the Partnerships Division that there will be a delay of additional business days.
- iii. **Effective tracking of partner screening:** Screening results will be returned directly to the requesting party and stored in the UNRWA Salesforce Database for future reference. The Partnerships Division will also introduce a portal (within the Agency intranet) for key field, department and national committee staff to electronically submit (and review the status of screening) requests.
- iv. **Exceptions for National Committees:** As entities established under domestic laws, national committees are bound to vet individual or cash contributions they receive in accordance with

applicable domestic law. However, the cooperation agreements between UNRWA and its National Committees should include provisions whereby National Committees are obliged to comply with UNRWA's corporate due diligence policy. The Partnerships Division will ensure, in close collaboration with the Department of Legal Affairs that the agreements are revised, and that procedures are put in place that will enable national committee to automatically screen individuals against the UN Consolidated Sanctions List.

- v. **Ensuring quality and transparency:** The Salesforce Database (and final Due Diligence Reports) will provide a transparent record of the screening process, the quality of research conducted and the screening decisions made (through the final reports of screenings). These reports will be stored for institutional memory and accessible to key Partnerships Division staff.

5. Due Diligence Exclusionary Criteria

All UNRWA and national committee staff interacting with potential partners must be continually aware of the following exclusionary criteria to effectively target potential partners for engagement.

Mandatory Exclusionary Criteria: Engagement is automatically rejected if the partner is listed on the Consolidated United Nations Security Council Sanctions List and no further checking is required against any additional automatic exclusionary criteria. No discretion shall apply in these instances.

Automatic Exclusionary Criteria: Engagement is automatically classified as High Risk and therefore rejected on confirmation of partner involvement in one or more of these areas. Partner is classified as Medium Risk on suspected or limited involvement in one or more of these areas³; in this case discretion can be exercised only by the Executive Office.

- ***Terrorism:*** Has the partner committed acts contrary to the 1999 Convention for the Suppression of the Financing of Terrorism? If so, automatic exclusion. No discretion shall apply in these instances.
- ***Violations of international law:*** Has the partner been directly involved in violations of international law, including obligations regarding the protection of human rights or the environment? This should be verified based on judgments, decisions, reports or other authoritative documents issued by relevant United Nations bodies and mechanisms. The issues covered under this category are : violation of the prohibition of slavery and forced labor ; violation of the rights of the child, including child labor ; violation of obligations regarding minimum labor standards as set out in relevant ILO instruments ; discriminatory practices in violation of relevant international law, including racial or gender discrimination [Note: if there

³ In this case full "engagement" in an exclusionary industry would be if the potential partner was a tobacco or alcohol company or company, such as British American Tobacco or Bacardi. "Limited involvement" would instead be the classification for a wealthy individual with links such a company but who primarily derived his/her wealth from another industry.

are allegations in the press or domestic judgments, then this would need to be considered under the heading of potential exclusionary criteria (reputational risk), as per below]. If so, automatic exclusion. No discretion shall apply in these instances.

- *Arms and munitions*: Is the partner involved in manufacturing weapons (including land mines and their components, weapons systems or weapons components)? This should be verified based on publicly available information issued by the partner (e.g. annual report on activities). If so, automatic exclusion. No discretion shall apply in these instances.
- *Tobacco*: Is the partner involved in manufacturing tobacco products? This can typically be easily verified based on publicly available information issued by the partner (e.g. annual report on activities). If so, automatic exclusion. No discretion shall apply in these instances.
- *Alcohol*: Is the partner involved in specialized manufacturing/distributing or retailing of alcoholic beverages? This can typically be easily verified based on publicly available information issued by the partner (e.g. annual report on activities). If so, automatic exclusion. No discretion shall apply in these instances.
- *Pornography*: Is the partner involved in pornography as a specialist in the production, content provision, or distribution of pornographic materials? This can typically be easily verified based on publicly available information issued by the partner (e.g. annual report on activities). If so, automatic exclusion. No discretion shall apply in these instances.
- *UN Suspended Vendors List*: Is the partner listed in the UN Suspended Vendors List? If so, automatic exclusion. No discretion shall apply in these instances.

Potential Exclusionary Criteria (reputational risk): Engagement is classified as High Risk and therefore rejected on confirmation of systemic, intentional and serious violations in these areas, within the past three years. Medium Risk is determined if there have been limited or suspected violations in the past, or more serious violations over three years ago. Low Risk is determined if there is no involvement found in any of the exclusionary criteria.⁴

- Association with individual or entity listed on the Consolidated United Nations Security Council Sanctions List: While not listed as such, does the /partner have any association or connection with an individual or entity listed on the UN Consolidated Sanctions List?
- Prior conduct that would be contrary to the Agency's requirements regarding third party neutrality as set out in the Agency's Neutrality Framework.
- Allegations of violations of international law: Are there allegations that the partner has directly been engaged in violations of international law, including obligations regarding the protection of human rights or the environment, which have not been established by relevant UN bodies and mechanisms? This would need to be assessed based on any information available in the public

⁴ "Systemic, intentional and serious violations" would be those that show repeated and systemic use of child labor. "Limited" violations would refer to a one-time infraction found by a subsidiary.

domain (e.g. media, NGO reports), including information on pending administrative or judicial proceedings before local authorities.

- **Fraud and Corruption:** Has the partner been found guilty in a court of law of: unscrupulous, coercive or collusive business practices, accounting irregularities, bribery, fraud, criminal activities or corruption?
- **Political conduct:** Is the partner involved in political activities that might reflect negatively on the Agency and its neutrality commitments as set out in the Neutrality Framework?
- **Any other circumstances or considerations** regarding the Agency's engagement with the partner that may give rise to reputational risks.

6. Roles and responsibilities

The following roles are integral to UNRWA's Due Diligence Policy on private partnerships:

Role	Responsibilities in the Due Diligence process
Private Partner Focal Point (PPFP): <i>The PPFP is the staff member from Natcoms, Field Offices or HQ Departments who receives and pursues partnerships from private individuals or entities.</i>	<ul style="list-style-type: none"> Any PPFP interacting with potential partners must be aware of the exclusionary criteria used in a primary screening to effectively target potential partners for engagement. When a potential private partner approaches a PPFP in a field, department or national committee, or vice versa, and a potential contribution/partnership arrangement is discussed for over \$2,500, the PPFP should initiate the due diligence process through the submission of a Screening Request to the Partnership Division. This request will provide all necessary information around the partnership, thereby enabling PD to effectively process a due diligence screening report. All contributions under \$2,500 will still need to be vetted against the UN Consolidated Sanctions Lists and the PPFP should in these cases submit a simplified Screening Request to the Partnerships Division.
Partnerships Division (PD)	<ul style="list-style-type: none"> The Partnerships Division (PD) oversees the entire due diligence process from the initial submission to the point of resolution and ensures that all stages are completed within the agreed timeframe. PD staff undertake research for all primary and secondary level screenings upon receipt of a complete Request for Screening. PD is responsible to pass on completed primary and secondary screening reports to the appropriate individuals and departments for approval or rejection. PD is responsible to make sure that the UNRWA Salesforce Database and intranet portal are kept up to date with the results of all screenings, whether positive or negative.
Chief, PD	<ul style="list-style-type: none"> The PD Chief is responsible for approving partner engagements that are valued at less than \$100,000 and that have been determined as Low Risk during primary screening. The PD Chief is responsible for referring to the Director of ERCD any engagement valued over \$100,000. The PD Chief is responsible for referring any engagements over \$1 Million to the Chief of Staff, based on inputs from primary and secondary screenings. PD Chief is responsible for referring any Medium-Risk engagements first to the Director of Legal Affairs and then to the Chief of Staff.

Director, ERCD	<ul style="list-style-type: none">• The Director of the ERCD is responsible for approving partner engagements that are determined as Low Risk and are valued between \$100,000 - \$1 million.
Director, Legal Affairs Department	<ul style="list-style-type: none">• The Director of Legal Affairs is responsible for advising the agency on legal implications that may arise from a secondary screening, based on inputs from primary screenings.
Executive Office	<ul style="list-style-type: none">• The Executive Office holds ultimate responsibility for the due diligence process, but delegates the management of the process to the Partnerships Division.
Chief of Staff	<ul style="list-style-type: none">• The Chief of Staff makes final decisions on approval of partnerships when the value is over \$1 million or if the engagement is determined as Medium Risk following primary and secondary screenings, taking into consideration the recommendations from the Director of Legal Affairs.

This Due Diligence Policy enters into effect immediately.

Date: 15/12/17



Pierre Krähenbühl
Commissioner-General

Annex II: UNRWA PRIVATE PARTNER SCREENING TEMPLATE

Partnerships Division Screening Template

Name of Partner:

Based on the information received, PD recommends the following:

- ☐ LOW RISK: Engagement can proceed
- ☐ MEDIUM RISK: Further Research and higher approval needed
- ☐ HIGH RISK: Engagement is rejected

Details of Requesting Party

Date submitted to PD	
Name of Requestor	
Title	
Division/Department	
Location	
Email	

Screening Request *(Completed by person responsible for initiating the screening)*

1. PARTNERSHIP INFORMATION	
Type of Entity (Foundation, Corporation, Individual)	
Description of Proposed Partnership model, including start and end dates if known:	
Estimated value of Partnership:	
What is the added value of this Partnership for UNRWA?	
What Public Recognition does the Partner require, if known):	
Is there an existing relationship with this Company or Individuals within the Partner?	
Did the Partner initiate a relationship?	

Based on your local knowledge and research, what is the assessment of the reputation of the partner? If any specific information is found, please provide sources.	
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2. PARTNER IDENTIFICATION INFORMATION	
Partner Name:	
Contact Information:	
Website Address:	
Industry Sector:	
Name of CEO:	
Core areas of business / Activity	

Primary Screening (Completed by the Partnerships Division)

3. PARTNER BACKGROUND INFORMATION	
The below information is critical to have a fuller understanding of the potential partner, but there is no reason to reject the engagement based on this information <i>unless risk factors based on Exclusionary Criteria (See Section 4) are found during research.</i>	
For corporation/ Foundation: Parent and Subsidiary Companies / Foundations For HNWI: List all companies and foundations owned or managed by this individual	
Location of Headquarters for above identified companies and foundations:	
Notable Shareholders/ Leadership:	
Number of Employees:	
Are there other Non-Profit Organisations that receive money from this partner?	
If a company, it is a participant in the United Nations Global Compact? https://www.unglobalcompact.org/what-is-gc/participants	

4. UNRWA MANDATORY EXCLUSIONARY CRITERIA

** NOTE: All UNRWA staff interacting with potential donors must be continually aware of the following exclusionary criteria to effectively target potential partners for engagement.*

Mandatory Exclusionary Criteria:

UN Consolidated Sanctions Lists: Is the partner listed on the Consolidated United Nations Security Council Sanctions List? If so, automatic exclusion.	
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5. UNRWA EXCLUSIONARY CRITERIA

** NOTE: All UNRWA staff interacting with potential donors must be continually aware of the following exclusionary criteria to effectively target potential partners for engagement.*

Automatic Exclusionary Criteria:

- Engagement is automatically classified as High Risk and therefore rejected on confirmation of partner involvement in one or more of these areas.
- Partner is classified as Medium Risk on suspected or limited involvement in one or more of these areas.⁵

<u>Criteria</u>	<u>Assessment of involvement</u>
Terrorism: Has the partner committed acts contrary to the 1999 Convention for the Suppression of the Financing of Terrorism? If so, automatic exclusion.	
Violations of International Law: Has the partner been directly involved in violations of international law, including obligations regarding the protection of human rights or the environment? This should be verified based on judgments, decisions, reports or other authoritative documents issued by relevant United Nations bodies and mechanisms. The issues covered under this category are : violation of the prohibition of slavery and forced labor ; violation of the rights of the child, including child labor ; violation of obligations regarding minimum labor standards as set out in relevant ILO instruments ; discriminatory practices in violation	

⁵ * In this case full "engagement" in an exclusionary industry would be if the potential partner was a tobacco or alcohol company or company, such as British American Tobacco or Bacardi. "Limited involvement" would instead be the classification for a wealthy individual with links such a company, but who primarily derived his/her wealth from another industry.

of relevant international law, including racial or gender discrimination [Note: if there are allegations in the press or domestic judgments, then this would need to be considered under the heading of potential exclusionary criteria (reputational risk), as per below]. If so, automatic exclusion.	
Arms and munitions: Is the partner involved in manufacturing weapons (including land mines and their components, weapons systems or weapons components)? This should be verified based on publicly available information issued by the partner (e.g. annual report on activities). If so, automatic exclusion.	
Tobacco: Is the partner involved in manufacturing tobacco products? We expect that this can typically be easily verified based on publicly available information issued by the partner (e.g. annual report on activities). If so, automatic exclusion.	
Alcohol: Is the partner involved in specialized manufacturing/distributing or retailing of alcoholic beverages? We expect that this can typically be easily verified on the basis of publicly available information issued by the partner (e.g. annual report on activities). If so, automatic exclusion	
Pornography: Is the partner involved in pornography as a specialist in the production, content provision, or distribution of pornographic materials? We expect that this can typically be easily verified based on publicly available information issued by the partner (e.g. annual report on activities). If so, automatic exclusion.	
UN Suspended Vendors List: Is the partner listed in the UN Suspended Vendors List? If so, automatic exclusion. No discretion shall apply in these instances.	

Potential Exclusionary Criteria: <ul style="list-style-type: none"> Engagement is classified as <u>High Risk</u> and therefore rejected on confirmation of <i>systemic, intentional and serious violations</i> in these areas, within the past <i>three years</i>. <u>Medium Risk</u> is determined if there have been limited or suspected violations in the past, or more serious violations over three years ago. <u>Low Risk</u> is determined if there is no involvement found in any of the exclusionary criteria.⁶ 	
Association with individual or entity listed on the Consolidated United Nations Security Council Sanctions List: While not listed as such, does the /partner have any association or connection with an individual or entity list don the UN Consolidated Sanctions List?	
Prior conduct that would be contrary to the Agency's requirements regarding third party neutrality as set out in the Agency's Neutrality Framework.	
Allegations of violations of international law: Are there allegations that the partner has directly been engaged in violations of international law, including obligations regarding the protection of human rights or the environment, which have not been established by relevant UN bodies and mechanisms? This would need to be assessed on the basis of any information available in the public domain (e.g. media, NGO reports), including information on pending administrative or judicial proceedings before local authorities.	
Fraud and Corruption: Has the partner been found guilty in a court of law of: unscrupulous, coercive or collusive business practices, accounting irregularities, bribery, fraud, criminal activities or corruption?	
Political conduct: Is the partner involved in political activities that might reflect negatively on the Agency and its neutrality	

⁶ "Systemic, intentional and serious violations" would be those that show repeated and systemic use of child labor. "Limited" violations would refer to a one-time infraction found by a subsidiary.

commitments as set out in the Neutrality Framework?	
Any other circumstances or considerations regarding the Agency's engagement with the partner that may give rise to reputational risks.	

Secondary Screening (Completed by the PD)

6. ADDITIONAL BACKGROUND INFORMATION ON ACTIVITIES AND OPERATIONS	
<ul style="list-style-type: none"> The main objective of secondary screening is to gain a fuller picture of business or foundation operations to make a clearer assessment for the partnership of the partnership risk and potential. In addition, if any involvement on Exclusionary Criteria is uncovered during the research process, then the partnership should be classified as Medium or High risk accordingly. 	
For company/foundation: who is the partner owned by?	
Does the partner engage in any activities not related to its core area of business? If so, please list.	
<u>Corporation</u> : Annual net profit, annual turnover <u>Individual</u> : Total wealth, annual salary <u>Foundation</u> : Assets and annual contributions	
If company or corporate foundation, is it listed in any stock exchange? If so, which one?	
Are you aware of any forthcoming or recent mergers?	
List the countries that the partner has operations or other financial interests.	
If company, does the company separate roles of Chairperson and Chief Executive?	
Is the partner transparent about financial information?	
What codes of conduct or pledges does the partner promote? (e.g. CSR policy, environmental pledges)	
Are there any negative media reports not already uncovered? If so, from what date and on what topic?	

7. OTHER RISK FACTORS DUE TO PARTNER ASSOCIATIONS	
<ul style="list-style-type: none"> The main objective of secondary screening is to gain a fuller picture of business or foundation operations to make a clearer assessment of the partnership risk and potential. In addition, if any involvement on Exclusionary Criteria is uncovered during the research process, then the partnership should be classified as Medium or High risk accordingly. 	
Does the partner have any (religious or other) association where there could be a reputational risk to UNRWA? If so, please state the risk.	
Is the company a member of the Ethical Trading Initiative (ETI)?	Check <u>Members of the Ethical Trading Initiative - ETI</u>

Final PPD Recommendation

- ☐ Cleared
☐ Not cleared
☐ Referral required

Please provide a justification for the recommendation:

Signed:

Misbah Sheikh, Chief, PPD
Date

Referral to DLA on Problematic Cases

DLA conclusions

- ☐ Legal obstacles ☐ No legal obstacles

Reasons for DLA conclusions are set out below:

Signed:

DLA
Date

Final Decision by the Executive Office

Recommendation by Executive Office

- ☐ Cleared ☐ Not cleared

Annex III: SUGGESTED RESEARCH WEBSITES FOR SCREENING IMPLEMENTATION

This list is not exhaustive, only indicative.

UN Global Compact :

<https://www.unglobalcompact.org/what-is-gc/participants>

UN Partnerships :

<https://business.un.org/en>

Consolidated United Nations Security Council Sanctions List

<https://scsanctions.un.org/search/>

Interpol List

<http://www.interpol.int/Wanted-Persons>

Financial Information :

<http://www.bloomberg.com/>

<http://www.hoovers.com/>

<http://www.nasdaq.com/quotes/company-financials.aspx>

<https://www.gov.uk/government/organisations/charity-commission>

<http://www.charitynavigator.org/?bay=search.alpha>

<http://foundationcenter.org/findfunders/990finder/>

Business Human Rights Link

<http://www.business-humanrights.org/Home>

CSR, Corporate Governance and Sustainability:

<http://www.corpwatch.org/>

<http://www.accountability.org/>

<http://sustainability-index.com/>

<https://www.globalreporting.org/Pages/default.aspx>

<http://www.ftse.com/products/indices/FTSE4Good>

<http://iccwbo.org/>

<https://www.stopcorporateabuse.org/>

Environment:

<http://www.enn.com/>

<http://www.unep.org/>

<https://www.edf.org/>

<http://wwf.org/>

Fraud and Corruption:

<https://www.transparency.org/>

Human Rights:

<https://www.amnesty.org/en/countries/>

<http://business-humanrights.org/en/un-guiding-principles>

<http://www.sourcewatch.org/>

<http://www.ohchr.org/>

<http://www.hrw.org>

Landmines, Cluster Bombs, Arms, Munitions, Replica Weapons:

<http://icbl.org/en-gb/home.aspx>

<http://www.dontbankonthebomb.com/>

<http://www.the-monitor.org/index.php>

Forced Labour, Child Labour, Discrimination at Work, Collective Bargaining:

<http://www.ilo.org/declaration/lang--en/index.htm>