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BUSINESS PARTNER SANCTIONS DUE DILIGENCE FORM

INSTRUCTIONS FOR USER:

This is a questionnaire that you can use when conducting due diligence on a business partner.

Code:	
Version:	
Date of version:	
Created by:	
Confidentiality level:	

Change history

Date	Version	Created by	Description of change
dd.mm.yyyy	0.1	ACSS	Basic document outline

BUSINESS PARTNER SANCTIONS DUE DILIGENCE FORM

1. Nature of the Relationship:

Customer ___ Supplier ___ Services Provider ___ Counterparty ___ Other ___

For Individuals:

2. Name:

3. Residential Address:

4. Business Address (if different):

5. Country of Citizenship:

6. Country of Residence:

7. Birthdate:

8. Identification Document No.:

9. Form of Identification:

Passport ___ National Identification Card ___ Driver's License ___ Other ___

For Entities:

10. Legal Name:

11. Doing Business As Name (if relevant):

12. Legal Status:

Individual ___ Corporation ___ Limited Liability Company ___ Partnership ___ Other ___

13. Business Address:

14. Mailing Address:

15. Country of Organization:

16. Ownership: List all legal owners of 10% or more of the entity, and provide the following information:

Legal Name:

Share of Ownership:

Country of Citizenship (if an individual):

Country of Organization (if an entity):

Address:

17. Ultimate Beneficial Owners: List all individuals (natural persons) who own 10% or more of the entity, either directly or indirectly (i.e., because they own a sufficient share of an entity that in turn owns the entity in question), and provide the following information:

Name:

Share of Ownership in Upstream Entity (i.e., entity with an ownership share in the business relation):

Share of Ultimate Ownership (i.e., ultimate share of ownership in the business relation):

Country of Citizenship:

Address:

Business

Describe the nature of the business partner's business:

18. Is the business partner involved in any of the following businesses or industries?

- a. Aviation and jet fuel
- b. Finance
- c. Defense or military goods, services, or technology
- d. Petroleum or petroleum exploration, production, refining, or trading
- e. Natural gas
- f. Currency trading
- g. Charcoal
- h. Graphite, and raw or semi-finished metals

- i. Commodity trading
- j. Cryptocurrency
- k. Iron, steel, coal, zinc, or copper
- l. Gold, precious metals, diamonds
- m. Nuclear
- n. Luxury goods
- o. Goods, technology and services subject to dual-use and proliferation sensitive export controls
- p. Art
- q. Maritime shipping and bunkering services
- r. Marine insurance
- s. Telecommunications monitoring and interception equipment, technology or software
- t. Logistics
- u. Energy
- v. Aerospace

19. Does the business partner purchase from, sell to, or operate in any of the following countries? If so, identify which.

- Afghanistan
- Belarus
- Burundi
- Central African Republic
- Congo
- Crimea
- Cuba
- China – border with North Korea
- China – Hong Kong
- China – Xinjiang Region
- Egypt
- Guinea-Bissau
- Iran
- Iraq
- Lebanon
- Libya
- Mali

- Moldova
- Montenegro
- Myanmar
- Nicaragua
- North Korea
- Russia
- Somalia
- South Sudan
- Sudan
- Syria
- Turkey
- Venezuela
- Yemen
- Zimbabwe

20. Is the business partner a trading company or agent who purchases goods on behalf of other end-users? (If so, request a anti-diversion agreements that includes OFAC/sanctions compliance commitments).