

**DENTSU  
COMPLIANCE DUE DILIGENCE  
INFORMATION REQUEST**

Please provide the information and documents required to answer the following request. If any of the questions are not applicable, please state "N/A" and do not leave any questions blank.

**1. Company Information**

1.1 Company name and address of principal place of business:

<b>Company Legal Name</b>	
<b>Any Previous Legal Names</b>	
<b>Company Number</b>	
<b>Street Address</b>	
<b>City</b>	
<b>County/State/Province</b>	
<b>Country</b>	
<b>Postal Code</b>	
<b>Website</b>	

The company and all subsidiaries and parent companies are collectively referred to in this information request as the "Company".

1.2 Please provide the legal names of any subsidiaries and parent companies, and their locations:

<b>Legal names of any subsidiaries and parent companies</b>	<b>Location</b>

1.3 Please list all ultimate legal and beneficial owners, partners and/or shareholders in the Company (percentage should total 100%):

<b>Name</b>	<b>Shareholding (%)</b>	<b>Date Shares Acquired</b>

1.4 Please list all Officers and/or Directors of the Company:

<b>Name</b>	<b>Title</b>	<b>Appointment Date</b>

**N.B.** An 'Officer' or 'Director' is an individual who is a named director in the Company's official administrative documents and/or holds an official post within the Company's corporate structure e.g. CEO, CFO, Company Secretary.

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**1.5** Does the Company have the required licenses to conduct business in all jurisdictions where it operates?

Yes    No

If **No**, please explain:

**2. Potential Conflicts of Interest**

**2.1** Please list and describe all previous or current relationships the Company has with any Dentsu company, subsidiary or affiliate (collectively, the “**Dentsu Group**”) and the period over which such relationships were active:

**2.2** Has any Officer or Director of the Company ever been employed by or performed services for the Dentsu Group?

Yes    No

If **Yes**, please provide details:

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**2.3** Is any Officer or Director of the Company related (by blood, marriage or otherwise) to any Officer, Director, or employee at the Dentsu Group?

Yes     No

If **Yes**, please provide details:

**3. Associated Persons**

**3.1** Please provide a list of all agents, consultants or intermediaries (including, but not limited to, subcontractors, sales agents, distributors, wholesalers, lobbyists, brokers) who are engaged by the Company to represent it or perform services for or on its behalf (collectively, "**Associated Persons**"). Please provide the details requested below:

<b>Associated Person</b>	<b>Location</b>	<b>Services Provided</b>	<b>Annual Value of Services Provided</b>

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**4. Government Interactions**

**4.1** Does any government entity or department, agency or arm of a government entity, own or control the Company in whole or in part, directly or indirectly?

Yes  No

If **Yes**, please provide details:

**4.2** Does the Company hold any contracts with, or otherwise provide services to, any government, government agency or arm of a government entity, or any government owned business?

Yes  No

If **Yes**, please provide details:

**4.3** Does any Officer, Director, employee or any individual associated (in terms of ownership, management or having any degree of control over its affairs) with the Company:

- (i) hold a legislative, administrative or judicial position (whether appointed or elected) of any kind;
- (ii) exercise a governmental or public function for or on behalf of any country or territory or for any public agency or public enterprise of that country or territory; or
- (iii) act as an official or agent of a government or public international organisation (individually and collectively a **“Government Official”**), or has been a Government Official within the past 3 years?

Yes  No

If **Yes**, please provide details below:

Name	Title	Organisation	Dates of service

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**5. Policies and Procedures**

**5.1** Please list and attach any existing Company policies and/or handbooks. Such policies may cover Finance, Human Resources, IT, Legal, Risk Management, Corporate & Social Responsibility:

Policy Name	Function	Policy Owner	Issue Date

**5.2** Please list and attach any existing Company policies and procedures or business controls in place to prevent bribery and corruption. Such policies may include:

- (i) Code of Conduct
- (ii) Anti-bribery and Anti-Corruption
- (iii) Travel and Entertainment
- (iv) Gifts and Hospitality
- (v) Third Party Due Diligence
- (vi) Whistleblowing

Policy Name	Function	Policy Owner	Issue Date

**5.3** Please list below any training that the Company has delivered to its employees on any of the policies and procedures outlined in 5.1 and 5.2:

Training Subject Matter	Audience	Delivered By	Delivery Date

**5.4** Does the Company permit its employees to give or receive things of value, including gifts, meals, entertainment and travel?

- Yes     No

If **Yes**, are there any restrictions on what may be offered or accepted?

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**5.5** Does the Company have a process for employees to report fraud, bribery and corruption or other wrongdoing in the workplace?

Yes    No

If **Yes**, please describe the process below:

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**6. Legal**

**6.1** Has the Company or any entity with which it is now or has been previously affiliated, its current and former shareholders, Officers and/or Directors, ever been the subject of investigations or allegations, been charged criminally or responded to an inquiry by any enforcement agency concerning fraud, bribery, or the Company's business practices or been suspended from doing business for any reason?

Yes    No

If **Yes**, please provide details:

**6.2** Does the Company comply with the requirements of the UK Bribery Act, the U.S. Foreign Corrupt Practices Act and all other applicable anti-bribery laws, including local anti-bribery laws?

Yes    No

If **No**, please provide details:

If **Yes**, is the Company prepared to certify its compliance with anti-bribery legislation on an annual basis?

Yes    No

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**7. Political Contributions**

7.1 Has the Company made or provided any political contributions or donations, including donations of goods, whether new or used, services and pro bono work or projects, to any political party or candidate (including date, amount, and beneficiary) in the last 5 years?

Yes    No

If **Yes**, please provide details below:

Beneficiary	Amount	Donation description	Date of donation

**8. Charitable Donations**

8.1 Has the Company made any charitable contributions or donations, including donations of goods, whether new or used, services and pro bono work or projects, to any person or organisation (including date, amount and beneficiary) in the last 5 years?

Yes    No

If **Yes**, please provide details below:

Beneficiary	Amount	Donation description	Date of donation

**9. Trade Incentives**

9.1 Does the Company (or any Associated Person on behalf of the Company) receive volume bonuses, volume discounts, commissions, annual refunds, gratuities, rate adjustments, rebates, year-end bonuses, or other forms of income generated through transactions with suppliers (individually and collectively, "**Trade Incentives**")

Yes    No

If **Yes**, please provide details of the controls which are in place at the Company to ensure compliance with any legal and/or client contractual obligations relating to such Trade Incentives:



**10. Supply Chain**

**10.1** Does the Company assess bribery and corruption risks, as well as sanctions, fraud, money laundering or terrorist-financing risks, when engaging with new and ongoing business partners (e.g. suppliers, customers, agents, contractors)?

Yes    No

If **Yes**, please provide details of the steps the Company undertakes to screen their business partners:

**10.2** The UK Modern Slavery Act 2015 requires companies to ensure there is no slavery in their own business and their supply chains. Can you confirm that the Company does not use or facilitate forced, indentured, bonded, slave or human trafficked labour or any type of involuntary labour?

Yes    No

If **No**, please provide details:

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**11. Certification**

The person whose signature appears below is authorised to certify on behalf of the Company that the foregoing is true and correct. The undersigned is providing some personal information about its management, staff, agents and other individuals (hereafter, "**Individuals**") to the Dentsu Group. The Dentsu Group will use the information collected from the Company, the undersigned and third-party sources for due diligence purposes primarily related to anti-corruption laws and to assess potential risks and the need for additional deal protection. Based on the responses, the Dentsu Group may request further information or ask for commercial references who, with the Company's agreement, can discuss the Company's business ethics and reputation in the business community. As part of this review, the Dentsu Group may share this information with internal and external legal advisors, qualified and designated due diligence providers, and as may be required by applicable laws, court orders, or government regulations, or pursuant to a valid request of a governmental agency. Recipients of the information provided as part of this review process may be located in countries with different privacy or data protection regimes than in the country in which the undersigned or the Individuals reside. The undersigned hereby affirms that: (i) disclosure of any personal data herein to the Dentsu Group complies fully with any and all applicable data protection or privacy laws, (ii) the undersigned has full authority to disclose such data and (iii) the Dentsu Group shall have permission to transfer such data as it deems necessary in relation to this review and as described above.

**The information provided above is, to the best of my knowledge and belief, accurate, current and complete. I agree to notify the Dentsu Group promptly of any material changes to the information provided herein.**

Name: \_\_\_\_\_

Title: \_\_\_\_\_

Signature: \_\_\_\_\_

Date: \_\_\_\_\_