

INTEGRITY RISK ASSESSMENT FORM (IRAF)

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Project			
DATE (mm/dd/yy) :			

Before compiling and dispatching to a Prospective Business Partner (PBP) the DeNovo Integrity Due Diligence Questionnaire (see below), we must first ascertain whether the proposed relationship with the Business Partner is High or Low Risk. The Illustrative Checklist below (although not exhaustive) will assist us in determining the level of risk posed by the PBP, the project or the tender in which DeNovo wishes to participate. The answers to the questions posed in the RAF will frame some of the questions put to the PBP in the IDDQ. If you are unsure of the risk posed by a PBP (or for that matter a Third Party), then you must consult the MDI without delay.

INTEGRITY RISK ASSESSMENT FORM

A. Prospective Business Partner ("PBP")			Risk Rating
1	Who is the PBP?		
2	What kind of entity or organisation is it?		
3	What do we want the PBP to do?		
4	Has DeNovo worked with the PBP before?		
5	Any concerns arising from the due diligence? If yes, please elaborate.		
6	a. How was the PBP found or introduced to DeNovo?		
	b. Are there mutual business contacts?		
	c. Is it internationally reputable?		
7	Concerns regarding the PBP's solvency or capacity to service the contract to the required standard?		
8	Is the PBP located in a high-risk jurisdiction?		
9	Does the PBP have counter-corruption procedures comparable to those of DeNovo?		
10	Are you aware of the PBP having a former or current public official on its payroll?		
11	Does the contract to be performed by the PBP require government or regulatory approval or licensing?		
12	Are you aware of there being a history of corrupt or sanctionable practices in the PBP's organisation?		
13	a. Any matters under investigation or previous penalties imposed?		
	b. If previous penalties imposed, what remedial action has the PBP taken to avoid repetition of the misconduct?		
14	Will the PBP be negotiating contracts or opportunities on behalf of DeNovo?		
15	Will the PBP be in contact with customers of DeNovo?		
16	Will the PBP be acting as a sales agent or intermediary on behalf of DeNovo?		

17	a. Does the PBP have relevant expertise or knowledge of the subject matter of the contract?		
	b. If not, are they to be appointed because of their contacts/relationship with individual public officials or contacts within existing/ potential customers?		
18	Are the PBP's proposed fees unusually high for the substantive service to be provided?		
19	Was the PBP recommended by a public official or potential customer to act as a "go between"?		
20	Does the PBP suggest that unusual or unreasonable gratuities or gift expenses will be incurred to secure business?		
21	Will the contract be performed by additional third parties of whom you are not aware?		
22	Does the PBP seek to be paid in an unusual manner or location for the service rendered?		
23	Are there any other facts or circumstances that may suggest that the contract or transactions with the PBP are not typical or not in the ordinary course of DeNovo's business? If yes, elaborate.		
B. Country of Operation		Risk Rating	
1	a. What rank is the country on Transparency International's Corruption Perceptions Index?		
	b. What is its score		
2	Are there any known concerns regarding a culture of corruption or local slang or local means of paying bribes?		
3	Do we have a IDD cleared and trusted local representative who can speak the language and provide assistance on cultural customs?		
4	Any self-sourced background information on local business practices, cultural customs, or corruption risks, such as facilitation payments? If yes, please elaborate:		
5	Any other comments?		

C. The Project (as Relevant)		Risk Rating
1	a. What sector does the project relate to?	
	b. Is it a high-risk sector?	
	c. Who is funding the project?	
2	How is the project disbursed?	
3	How will satisfactory delivery be evaluated and signed off (method and individuals concerned – client or neutral third party)?	
4	a. Has the project had other phases?	
	b. Were they successful?	
	c. If not, what was to blame?	
5	Any open-source intelligence regarding any allegations of wrongdoing on the project?	
6	Will the project require any special licenses?	
7	Must an application be made to local or central government?	
8	How are these to be obtained?	
9	Any other comments?	
D. Government Officials		Risk Rating
1	Does the PBP intend to interact with or use public officials, including government officials, as part of the service provided to DeNovo? If so, what officials?	
2	Are there any known concerns over the integrity of those officials? If yes, elaborate:	
3	Any evidence of solicitations of a thing of value in exchange for unpublished or confidential information?	
4	Any evidence of unsolicited offers of unpublished or confidential information, even free of charge?	
5	Any evidence of unsolicited offers to extend deadlines for any of the bidders?	
6	Do any government officials seem to be disproportionately wealthy compared to their function and the local market?	
7	Any government officials linked to the project or bidding process considered to be Politically Exposed Persons (“PEPs”)	

(Note: A PEP is as an individual who is or has been entrusted with a prominent public function. Due to their position and influence, it is recognised that many PEPs are in positions that could be abused for the purpose of committing money laundering offences and related predicate offences, including corruption and bribery, as well as conducting activity related to terrorist financing).

E. Tender Process		Risk Rating
1	Has the bid been properly advertised in reputable publications?	
2	Are the specifications unduly specific or appear geared towards a certain competitor? If so, to whom?	
3	a. Have there been any leaks of unpublished or confidential information, such as documents, specifications, budget or other information, such as contents of a competitor's bid? b. Has such information been offered to DeNovo? If so, by whom? c. In exchange for a thing of value? If yes, please specify.	
4	Are the bid submission deadlines sufficient from the RFP publication date in order to produce a meaningful proposal?	
5	a. Have there been any offers to extend the submission deadline just for DeNovo?	
	b. Or has it been extended for just one competitor?	
	c. If a deadline is extended for all competitors what was the official reason?	
6	a. Has the deadline been extended more than once?	
	b. What was the official reason?	
7	Are bid clarification responses circulated to all the bidders?	
8	Is there a requirement to pair with a local partner? If so, is the partner suggested by the client/ government official?	
9	Does the partner have any links to the client, State, or individual government officials?	
10	Are you aware of unofficial communications between a bidder and the evaluating authority?	
11	Is the bid opening public? If so, is there a very large or minute disparity in the technical or financial scores?	
12	Do any of the bids seem unfeasibly low in terms of costing?	
13	Has DeNovo been asked to integrate a contingency of more than 5%?	

14	a. Has DeNovo has been shortlisted for contract negotiations, does the client make extensive changes or demands regarding the components of the bid or replacement of good or individual consultants?	
	b. Does the client suggest the replacement?	
	c. Do replacement goods or consultants have any links back to client?	
15	Have there been any proposals for 'success fees', 'commercial costs' or bogus license fees to be paid e.g., to the PBP should DeNovo win the contract award?	
16	Any other comments?	
F. Competitors		Risk Rating
1	Have any other companies involved been debarred or sanctioned for corrupt/sanctionable practices?	
2	Have any of the competitors participated in previous phases of the project or worked with the PBP or client before?	
3	Is there information or online track record suggesting prior connection with client?	
4	Any other comments?	
G. Implementation		Risk Rating
1	a. Have there been any difficulties in the relationship with the PBP or the client?	
	b. What was the cause?	
	c. Was it easily resolved?	
2	Any quality issues regarding deliverables? If yes, elaborate.	
3	Any other comments?	
H. Any additional comments		Risk Rating

INTERNAL USE ONLY

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A. DeNovo IDD Propos			
1	Name:		
2	Position:		
3	Signature		
5	Reason(s) for		
	Undertaking		
	IDD		
B. MDI Approval Granted			
1	Name:		
2	MDI Comments and/		
	or requests for further information:		
3	Signature		4. Date