



NEXTGEN COMMUNICATIONS S.R.L.

Compliance Department

DUE DILIGENCE (iDDfix) PROCEDURE

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DUE DILIGENCE (IDDFIX) PROCEDURE	Reference	Version	Page
	PR.GOV.01.02	1.0	2 of 13

CONTENT

1.	PURPOSE	3
2.	APPLICATION DOMAIN	3
3.	DOCUMENT SUPPORT	3
4.	REFERENCES	4
5.	DEFINITIONS & ABBREVIATIONS	4
6.	DUE DILIGENCE PROCESS	4
6.1	INFORMATION NEEDED FOR THE DUE DILIGENCE PROCESS	4
6.2	PRE-ASSESSMENT PHASE	5
6.3	PERFORM IDDFIX DUE DILIGENCE TASKS	8
6.4	ETHICS AND COMPLIANCE SELF-DISCLOSURE QUESTIONNAIRE (SDQ)	9
6.5	SUBCONTRACTORS	10
6.6	STANDARD COMPLIANCE CLAUSE	10
6.7	DD REPORT AND EVIDENCE	10
7.	ESCALATION FLOW	11
8.	RENEWAL OF THE DUE DILIGENCE AND MONITORING	12
9.	ARCHIVING	12
10.	LEVELS OF CONTROL	12
11.	ANNEXES	13
12.	MODIFICATION HISTORY	13

DUE DILIGENCE (IDDFIX) PROCEDURE	Reference	Version	Page
	PR.GOV.01.02	1.0	3 of 13

1. PURPOSE

The current procedure aims to formalize a consistent and effective approach in relation to the due diligence process managed for NextGen Communications' (NG) partners (e.g. suppliers, subcontractors, B2B customers, interconnect partners, etc.).

The process has been developed to optimize and unify the due diligence efforts in compliance adherence and fraud prevention and to identify and mitigate the risks that might arise in the contracting and partnership process between NG and its partners, such as fraud or corruption risks, financial risks, reputational risks, non-compliance with economic sanctions, money laundering or terrorist financing.

The Partner due diligence is performed in alignment with the anti-bribery and anti-corruption risk mapping exercise and in accordance with the Orange Group Methodology and AFA Guidelines.

2. APPLICATION DOMAIN

The current procedure shall cover all current active/ new/ renewed/ amended agreements (framework agreements, contracts, additional acts) concluded between NG and partners.

Note: As a general rule, the iDDfix Process applies to a partner and not to a specific agreement.

The following type of partners are **excluded** from the scope of the iDDfix Process:

- Group partners with which NG has signed a Corporate Contract (evaluated by the Orange Group directly or through the BuyIn function); It is to note that NG remains responsible for the Due Diligence of the partner local entity with whom the contract is signed in case of a local implementation contract
- Partners already evaluated in the last 12 months for partners with weight 4 & 5 and 24 months for partners with weight 1, 2 & 3;
- Intercompany partners (Orange Group Affiliates).

Furthermore, the procedure is addressed to all teams involved in the selection process of partners, as per NG's available procedures, including, but not limited to the ones belonging to one of the following departments/divisions:

- Procurement Department
- B2B Sales Department
- Mm Sales & Customer Relations Division
- Human Resources Department
- Finance Department

3. DOCUMENT SUPPORT

The original / approved version of this manual is to be found within KMS Site in electronic format(<https://kmsnextgen.next-gen.ro> Sectiunea Compliance).

DUE DILIGENCE (IDDFIX) PROCEDURE	Reference	Version	Page
	PR.GOV.01.02	1.0	4 of 13

4. REFERENCES

NG Procurement Policy
NG Anti-Corruption Policy
NG Supplier Code of Conduct
Orange Group Policy for compliance with economic sanctions programs and trade control rules
GFRA Partner Fraud Risk Module

5. DEFINITIONS & ABBREVIATIONS

CUI	Tax Identification Number (Cod Unic de Înregistrare)
Due Diligence	Represents a set of controls performed before signing or renewing a contract with a partner, to ensure that this relationship is not potentially at risk and to enable taking informed decisions on such partner. Describes the investigation, examination and clear, systematic and detailed analysis of all the information linked to an NG partner.
UBO	Ultimate Beneficial Owner
iDDfix	Due diligence methodology developed by the Orange Group to optimize and unify due diligence efforts in compliance and fraud prevention
NG	NextGen Communications S.R.L.
CF representative	Compliance Department Representative – the responsible member of the Compliance Department conducting the due diligence analysis
Requesting BU representative	The person(s) responsible in each of the Business Units to send DD requests to the Compliance Department, with supporting documentation, obtains SDQ where required, and receives the completed DD file from the Compliance Department
Head of Requesting BU	The Chief Officer/Director coordinating the activity of the Business Unit within the Company which will sign the contract with the partner
Anti-Fraud Responsible	The person responsible within the company with the anti-fraud management process
PEP	Publicly Exposed Person According to the Law no. 129/2019 for the prevention and combating of money laundering and the financing of terrorism and for the modification and completion of other normative acts, the publicly exposed persons are individuals who exercise or have exercised important public functions, members of their families, as well as persons who are publicly known as close associates of individuals exercising important public functions. For further details, please refer to the document "PEP Definition_RO&UE legislation" found in Annex 11 of this working procedure.

6. DUE DILIGENCE PROCESS

6.1 Information needed for the Due Diligence Process

When a prospective partner is identified, the Requesting Business Unit representative sends a request to the Compliance Department containing the following information needed to perform the Due diligence (DD) analysis, using the communication channel conformitate@next-gen.ro, as follows:

- I. The full name of the entity for which the Due Diligence analysis is requested;
- II. Sole identification code (CUI) of the entity and/or Registration Number with the Trade Register
- III. Type of partner, for more details please refer to the section 6.2 point B, mentioned below

DUE DILIGENCE (IDDFIX) PROCEDURE	Reference	Version	Page
	PR.GOV.01.02	1.0	5 of 13

In addition to the above-mentioned identification data, the following information must be provided together with the request:

- IV. The object and the value/ cumulative value of the contract; if the exact value is not known in advance, an estimate shall be provided
- V. The contract period;
- VI. The method applied for selecting the prospective contractual partner, and the grounds for the selected method in case of exception from the procurement principles;
- VII. Any other information/ documentation required for a complete Due-diligence analysis, based on Compliance requirements.
- VIII. Ethics and Compliance Self-disclosure Questionnaire upon specific request by the Compliance Department representative (Annex 1)

In case the partner is a self-employed person (PFA)/freelancer, the Requesting Business Unit representative will also send to the Compliance Department the following documents:

- IX. His/ her fiscal certificate;
- X. The Statement of Conflicts of Interest.

6.2 Pre-Assessment phase

Step 1: Verification of the Non-Compliance List

The initial risk assessment consists in verifying the Non Compliance List (NCL), to check if the prospective partner is included thereof or not. If the prospective partner is identified in the NCL list, this would result in a negative endorsement from the Compliance Department representative, without having to go through the initial pre-assessment phase.

A query in the Non Compliance List can also be performed by the designated person in the Procurement team.

The NCL Assessment has precedence over the assessment in accordance with the NCL Procedure attached as Annex 2 to this procedure.

Step 2: Perform iDDfix Pre-assessment

If the prospective partner has not been identified in the NCL list, the Compliance Department responsible shall perform the due-diligence process by using the DD partner file form. According to the iDDfix process, the following points, on the basis of which partners are verified in order to **determine the appropriate level of risk and the level of due diligence to be undertaken**:

- I. Partner's country of incorporation
- II. Ultimate parent company's country of incorporation
- III. Country(ies) where the product/services is delivered
- IV. Is the partner listed on a stock exchange?
- V. Is the partner government-related?
- VI. Type of partner

The points listed above will be used for determining the **Country and Governance** (consisting of the risk of corruption, economic sanctions and the risk of money laundering and terrorism financing) and **Partner type** ratings. Furthermore, the level of due diligence shall be calculated by concatenating these ratings, using the following Matrix:



A. The **Country and Governance** risk level is determined by summing up the weights assigned to the following risk :

- The risk of corruption in the partner's country of incorporation – calculated based on the Transparency International Corruption Perceptions Index, where countries with transparency index between 60 and 100 shall be assigned weight 1, countries with transparency index between 30 and 59 shall be assigned weight 2, and countries with transparency index between 0 and 29 shall be assigned weight 3.
- The risk related to International Economic Sanctions
- The risk related to Money Laundering and Terrorism Financing
- The risk related to Tax Avoidance
- If the partner has known government links (more than 10% ownership or Publicly Exposed Persons links, 1 (one) point is added to the score.

If the partner is not listed on a recognised international stock exchange, 1 (one) point is added to the score.

B. The **Partner type** shall be determined as follows:

- **Partners with weight 1:**
 - Standard suppliers (goods or services) with whom purchase agreements are signed (suppliers which do not sit under any other specific supplier category);
 - Business customers (B2B customers, either private or public, across any industry).
- **Partners with weight 2:**
 - Domestic interconnect partners or telco partners (Telecom providers which facilitate the handling of voice and data traffic within one country for other telcos (allowing customers of different service providers to communicate with each other), or which are used to connect the customer to the local core network);
 - Integrated suppliers (Suppliers of equipment or services which are necessary for the provision by NG of its own services to its B2B customers (equipment or services that NG resells to its end-customers or integrates into its own offers);
 - Professional, consultancy or outsourced services suppliers (no interaction with NG customers or public officials/ government organisations) (Suppliers of any type of professional, consultancy or outsourced services where there is no interaction with NG's customers or public officials / government organisations including lawyers, consultants and tax advisors only if these partners are exclusively for NG's internal use));

DUE DILIGENCE (IDDFIX) PROCEDURE	Reference	Version	Page
	PR.GOV.01.02	1.0	7 of 13

- Roaming partners (Mobile operators which allow NG customers to “roam” on its network and its customers to roam on NG network).
- Debt recovery agency (Partner that collects debt from NG customers; there are broadly two types: (1) Agent that collects money on NG's behalf (e.g. outsourced partner that typically receives a % of sum collected and (2) Purchaser of bad debt (where NG sells a book of debt for a pre-negotiated amount)
- **Partners with weight 3:**
 - Commercial sponsorship (Recipients of commercial sponsorship from NG e.g. for an event or activity. Support provided either financially or through the provision of products or services);
 - Charity or consumer associations (Non-profit organisations with a principal focus on philanthropic and social well-being goals serving the public interest, common good, or consumer interest);
 - Content or service providers (Business that provides telco value-added services (e.g. ring tones, music streaming, gaming, videos, or premium content) to the end customer free of charge or for a premium price. NG invoices customer and supplier invoices NG.);
 - Financial services providers to NG customers (Entity governed by national and international financial regulations providing financial services to NG customers);
 - International interconnect partners or telco partners (Telecom providers which facilitate the handling of voice and data traffic internationally for other telcos, allowing customers of different service providers to communicate with each other, or which are used to connect in several countries a B2B customer to the local core network or which provide services or equipment to end B2B customers when NG has no license)
 - MVNO/ MVNA/MVNE, (**Mobile Virtual Network Operator (MVNO)**): a carrier which uses NG's network to provide services to its own branded customers; **Mobile Virtual Network Aggregator (MVNA)**: a provider that buys access to NG's network and sells it to MVNOs; **Mobile Virtual Network Enabler (MVNE)**: a supplier of infrastructure necessary for MVNOs to operate and provide services)
 - B2B or B2C reseller or distributor (Businesses which distribute/ resell B2C or B2B services of NG to their end customers, whether in a sell-through or value-added mode (includes small indirect channels selling mobile devices and contracts to end consumers, from small businesses to large strategic partners, as well as integrators or prime contractors);
 - Landlords, site acquisition, real estate brokers/owners, real estate buyers or civil work contractors (Owners of NG office, commercial or technical buildings and/or sites; real estate brokers/owners or civil work contractors, without interaction with public officials/government organisations);
 - Advertiser/communications agencies (Partners that provide advertising services to NG).
- **Partners with weight 4:**
 - Intermediaries sales agents (Individuals or entities expected to interact with customers in the context of selling NG products or services: (i) introducing or marketing the products of NG to potential customers, (ii) introducing potential customers to NG, (iii) otherwise assisting NG in selling its services to potential/existing customers when the person interfaces with the potential/existing customer);
 - Intermediaries non-sales agents (Individuals or entities expected to interact with a Public Official or government organisation in the delivery of their work on behalf of NG; this may include filing documents with government organisations, procuring routine consents and permits, performing routine administrative functions or defending NG in litigations);
 - Non-controlling participation (Business in which NG is seeking to acquire a small, non-controlling stake into a business or start-up).

DUE DILIGENCE (IDDFIX) PROCEDURE	Reference	Version	Page
	PR.GOV.01.02	1.0	8 of 13

- Partners (clients) that access EU and public funding and for which NG is acting as subcontractor
- **Partners with weight 5:**
 - Joint Venture (A partnership with NG involving a business agreement whereby the parties agree to develop, set up and operate a new entity with distinct assets through contributing equity, sharing control, revenues, expenses and assets over the separate enterprise)
 - M&A target (A business that NG is looking to buy, merge with or sell, to achieve growth in the industry sector or geographical location, or in a new field of business / new geography. Majority / controlling participations).

6.3 Perform iDDfix due diligence tasks

Based on the results of the initial risk evaluation, four due diligence levels have been set:



Low	Moderate
High	Very high

Due Diligence

Depending on the risk level identified, the preliminary risk assessment shall specify 4 Due Diligence levels:

- 1) Low
- 2) Moderate
- 3) High
- 4) Very High

The Compliance Department representative shall undertake follow up actions after the preliminary risk assessment.

- A. In case of a **Low** due diligence level, the Compliance Department representative shall determine and verify the:
 - Company Legal & Brand Name
 - Incorporation date
 - Country of registration
 - Partner headquarters address
 - Identification number (i.e. CUI or any other identification number)
 - Check if the partner and its ultimate parent company is based in any of the countries listed in the "Sanctioned entities list" – as mentioned in the DD Partner File
 - Open web search on the company (incl. company web site) and its key brands
- B. For a **Moderate** due diligence level, the Compliance Department representative shall undertake the actions listed in the **Low** section, and additionally determine, verify and screen the:
 - Company name
 - Shareholder(s)
 - Ultimate Beneficial Owners (UBOs) (25% ownership or more)
 - Company directors
 - Corporate structure/ chain of ownership
 - Company's bank (international economic sanctions screening only)

In case of red flags identified or if some information are missing related to the Shareholder(s) and/or Ultimate Beneficial Owners (UBOs) /or Company directors/ Corporate structure/ Company's bank are

DUE DILIGENCE (IDDFIX) PROCEDURE	Reference	Version	Page
	PR.GOV.01.02	1.0	9 of 13

unknown, the Compliance Department representative will perform mandatory additional checks, as following:

- Request the partner to complete the Ethics and Compliance Self-Disclosure questionnaire with all required information, and check the responses once received before the completion of the DD analysis and signing of the contract – see section 6.4 for more detail on the process
 - Perform Conflict of interest checks on partner's key associates/directors
- C. If the initial risk assessment results in a **High** or **Very High** due diligence level, the following actions will be undertaken, in addition to the ones mentioned above:
- Request the partner to provide the Ethics and Compliance Self-Disclosure questionnaire, filled in with all required information, before the completion of the DD analysis and signing of the contract
 - Verify and screen :The Directors and shareholders of the company with the information provided in the Ethics and Compliance Self Disclosure Questionnaire
 - Determine and screen
 - The Executive board members
 - Other companies connected to directors
 - Negative News search on:
 - Company / brands
 - Directors
 - Shareholders and ultimate beneficial owner
 - Other companies in the corporate structure
 - Determine and screen subsidiaries, all companies in chain of ownership, other companies connected to shareholders
 - Reviews of the activity domain and previous experience of the persons involved
 - Further search routines in online sources regarding the PFA/company and management
 - Conflict of Interest Statement, Criminal & Fiscal File for PFA

In the event of a **Low/Moderate** initial risk assessment, the Compliance Department Representative shall perform partner verifications at the identified due diligence level, except for situations where the he/she, having reasonable knowledge about non-compliance or fraud events concerning a given partner, believes that the determined due diligence level should be increased to the **High** level, in which case further checks will be performed.

The results of the due diligence process will be inserted and archived in the *Due Diligence Partner File*, as per Annex 3.

Note: The due diligence analysis is based on the *iDDfix Orange Group methodology*, as per Annex 4.

6.4 Ethics and Compliance Self-Disclosure Questionnaire (SDQ)

This questionnaire supports in obtaining all the needed partner information referring to legal identity, shareholding, financial information, ethics and compliance program etc.

For partners ranked during the pre-assessment check with a **High/ Very High** risk, the iDDfix process requires the completion of the Standard Ethics and Compliance Self-disclosure questionnaire ("*Orange Group Ethics and Compliance Self-Disclosure Questionnaire*") as detailed in Annex 1. Specific questionnaires are used for NGOs (charities) and law firms, attached as Annex 5 and Annex 6. An introductory letter to the Ethics and Compliance Self disclosure questionnaire can also be sent to the partner, as Annex 7. For partners ranked during the pre-assessment check with **Moderate risk level**, if some information is missing or red flags have been identified, the sending of the Ethics and Compliance Self disclosure questionnaire becomes mandatory as well.

The Compliance Department representative will notify the Requesting Business Unit representative that the partner is required to complete the relevant Ethics and Compliance Self-disclosure questionnaire. The Requesting Business Unit representative will request the respective partner to complete and provide the

DUE DILIGENCE (IDDFIX) PROCEDURE	Reference	Version	Page
	PR.GOV.01.02	1.0	10 of 13

questionnaire prior to the signing of the contract and will send it to the Compliance Department representative in charge with performing the due-diligence analysis to review the answers provided.

If the partner refuses to answer the questionnaire, then it should be treated as a red flag. A reminder must be sent to the partner, and an escalation to the Requesting Business Unit representative should be executed if they refuse to answer.

The due diligence report cannot be closed until the Ethics and Compliance Self disclosure questionnaire is received from the partners, filled in with all required information, and analysed by the Compliance Department representative, who will attach it in the Final DD report as evidence of the Due Diligence performed.

The respective partner who fails to send the completed self-disclosure questionnaire will not be contracted by the company.

The validity period of the Self-Disclosure Questionnaire is defined based on the third-party risk level, in line with the renewal period of the DD analysis: **2 years for Low and Medium risk partners and 1 year for High and Very High risk partners and all partners identified with compliance and fraud red flags.**

6.5 Subcontractors

In cases where the partner engages another company to perform services, tasks, obligations, the Requesting Business Unit representative shall ask the Compliance Department to perform due diligence analysis on the subcontractor(s) involved.

The same criteria shall be applied for analysing the subcontractors, in terms of identifying the applicable Due Diligence level.

The Requesting Business Unit representative/Procurement representative shall not approve the engagement of any subcontractor, if the respective entity (i.e. prospective subcontractor) has not been advised by Compliance Department following the results of the Due Diligence analysis.

6.6 Standard Compliance Clause

All contracts concluded with partners shall contain the standard compliance clause as presented in Annex 8. Any amendments proposed by the partner regarding the compliance clause shall be reviewed by the Compliance Department representative in accordance with Orange Group Guide on the Compliance Clause attached as Annex 9. No amendment to NG's standard compliance clause shall be agreed without the Compliance Department prior approval, who may consult with the Legal & Regulatory Department on certain amendments

6.7 DD Report and Evidence

The evidence file will comprise the following documents, as per the DD Partner File respective sheet:

- A summary of any red flags found (as per the Red Flags Guide, Annex 10)
- Pre-assessment results (p.1 of the DD Partner file)
- iDDfix Checklist completed (p.2 of the DD Partner file)
- Ethics and Compliance Self-disclosure questionnaire returned by the partner (if applicable)
- Supporting documents and details of searches undertaken (Compliance Catalyst report, downloads from other tools or registers, company/person screening, media results, research tracker (if used))
- Recommendations of the person responsible for the due diligence (include name / date)
- Final decision taken following completion of the decision process, specifically in case of GO with proposed mitigation measures / Escalation as per Chapter 7 / NO GO including details of any conditions that were agreed / mandated and date of the decision
- Name and function of the person /Committee responsible for the final decision
- Recommended date for the renewal of the due diligence

DUE DILIGENCE (IDDFIX) PROCEDURE	Reference	Version	Page
	PR.GOV.01.02	1.0	11 of 13

An evidence of the partners assessed through the due diligence process is centralized in an Excel report named "Due-diligence assessment," posted on the server within the Compliance Department .

The file contains the following information:

- I. Partner name;
- II. CUI;
- III. Partner type;
- IV. Risk level according to the pre-assessment;
- V. PEP;
- VI. Date of the analysis, as well as the last year included in the due diligence verification;
- VII. Compliance Department representative name (the person who performed the analysis);
- VIII. Requesting Business Unit representative name (the person who requested the analysis);
- IX. Escalation to Chief Compliance Officer (for the cases when is requested)
- X. Escalation to DEAD and CEO (for the cases when is requested)
- XI. Escalation to Europe CCO and Orange Group CCO
- XI. Recommendation received from the Compliance Department

7. ESCALATION FLOW

Following the completion of the due diligence process, the Requesting Business Unit representative and the Head of the Requesting Business Unit receives from the Compliance Department representative through e-mail the conclusions of the analysis, including:

- a summary of the results of the Due Diligence Analysis, presented in the body of the email;
- recommendation of the Compliance Department on
 - GO
 - GO with proposed mitigation measures/
 - Escalation as per Red Flags Guide/
 - NO GO

In case of **GO with proposed mitigation measures**, the Head of the Requesting Business Unit shall provide to the Compliance Department a signed form in which he/she confirms that the recommended mitigation measures will be implemented and indicates also a timeframe for that. The Head of the Requesting Business Unit may propose alternative / supplementary mitigation measures, which will need to be agreed with the Compliance Function.

In case of **Escalation as per Red Flags Guide**, the Compliance Department responsible will provide the recommendation together with a potential mitigation plan to the Requesting Business Unit representative and Head of the Requesting Business Unit, in accordance to the process flows stipulated by the Orange Red Flags Guide.

The final decision on Go/NO-GO for the respective partner shall belong, in case of compliance risks to the CEO, and in case of fraud risks to the CEO together with DEAD.

Note that it is important to state that whilst Compliance is responsible for providing a recommendation, the decision to proceed or not with the proposed contract / partnership / business the management takes relationship.

If the project is considered to be strategic/high impact for the company (e.g. projects including EU related funds, directly or indirectly, etc.), the matter will be brought to the attention of NG CCO, and the decision will

DUE DILIGENCE (IDDFIX) PROCEDURE	Reference	Version	Page
	PR.GOV.01.02	1.0	12 of 13

be escalated to the NG CEO, together with all information on the partner and Compliance Department recommendation.

The Compliance Department may escalate, if needed, to the attention of the DEAD and/or CEO, additional compliance and fraud risks that are not mentioned in the Orange Group Guide on iDDFix Red Flags.

Certain kinds of red flags described in the iDDFix guide on red flags require mandatorily an escalation at Europe CCO and/or Orange Group CCO level as described in *Orange Group Guide on iDDFix Red Flags* or for certain fraud red flags to GFRA as defined in the *Orange Group Guide on iDDFix Red Flags*.

8. RENEWAL OF THE DUE DILIGENCE AND MONITORING

In order to limit NG's exposure to any financial and/or reputational risk, the Compliance Department shall perform a Due Diligence Renewal for existing partners with weight 1, 2 every 2 years, and yearly for existing partners with weight 3, 4 and 5. To this end, the Compliance Department shall assess monthly what partners need to be evaluated. Furthermore, for partners of weight 3, 4 and 5 the due diligence shall be re-performed at the initiation of any addendum to the existing contracts, even if less than 1 year has passed.

Proactive Monitoring to alert NG Compliance Department of new information on riskiest partners will be put in place.

9. ARCHIVING

The due diligence files must be archived and stored during the whole contract duration and 5 years after the contract ending.

All due diligence analysis and resolutions will be archived in the Compliance local files sharing server.

10. LEVELS OF CONTROL

In order to ensure the use and applicability of the iDDFix process, levels of control have been set up as follows:

The **First level of control** will be performed during the ICS (Internal Control System). In this sense, annually, the responsible member of the Compliance Department will check, on a sample basis, the Due Diligence Analyses carried out, as follows:

- I. 10% of low risk/medium risk partners*;
 - II. 20% of all high and very high risk partners*;
 - III. 30% of DD files where compliance and fraud risks were found.
- *the ranking is determined based on the result of the pre-assessment evaluation.*

The records of the Due Diligence Analyses checked by the responsible member of the Compliance Department will be kept in an Excel file, archived on the Compliance local file sharing server.

The **Second level of control** will be performed by the Compliance Department (non-prevention). Thus, the Compliance team members, outside of the preventive area, will annually check, on a sample basis, the due diligence analyses carried out by the Compliance Department prevention, as follows:

- I. 5% of low risk/medium risk partners*;
 - II. 10% of high risk and very high risk partners*;
 - III. 20% of DD files where compliance and fraud risks were found.
- * the ranking is determined based on the result of the pre-assessment evaluation.*












DUE DILIGENCE (IDDFIX) PROCEDURE	Reference	Version	Page
	PR.GOV.01.02	1.0	13 of 13

Records of the Due Diligence Analyses checked by the Compliance Department (non-prevention) will be kept in an Excel file, archived on the Compliance local file sharing server.

The **Third level of control** will be provided by the internal audit team, which will conduct its analysis according to the audit plan, when the topic will be requested/ established within the approved audit plan

SLAs and KPIs are applied in accordance to the provisions stipulated by the PR.GOV.01.01 Compliance Management Procedure.

11. ANNEXES

Annex 1  F1.GOV.01.02 OROC Ethics and Compliance	Annex 2  PR.GOV.01.02.01 Non-Compliance List	Annex 3  F4.GOV.01.02 Due Diligence Partner File..	Annex 4  iDDfixPack_V2.4 EN.pdf	Annex 5  F2.GOV.01.02 Ethics and Compliance Self I	Annex 6  F3.GOV.01.02 OF Ethics and Compl
Annex 7  Introductory Letter to SDQs.docx	Annex 8  Standard Group Compliance Clause.doc	Annex 9  Guide Compliance Clause - February 20;	Annex 10  Orange Group iDDfix Red Flags Guide.pdf	Annex 11  Annex 11 Publicly Exposed Person (PEP)	

Annex 1: F1.GOV.01.02 NG Ethics and Compliance Self-Disclosure Questionnaire
Annex 2: PR.GOV.01.02.01 Non-Compliance List Procedure
Annex 3: F4.GOV.01.02 Due Diligence Partner File
Annex 4: Orange Group Compliance and Fraud Due Diligence Process (iDDfix)
Annex 5: F2.GOV.01.02 Ethics and Compliance Self-Disclosure Questionnaire for NGOs
Annex 6: F3.GOV.01.02 NG Ethics and Compliance Self-Disclosure Questionnaire for Law firms
Annex 7: Introductory letter to SDQ
Annex 8: Standard Group Compliance Clause
Annex 9: Orange Group Guide Compliance Clause
Annex 10: Orange Group iDDfix Red Flags Guide
Annex 11: Publicly Exposed Person (PEP) Definition RO&UE legislation

12. MODIFICATION HISTORY

VERSION	AUTHOR	DATE	DETAILS
1.0	Cornel Matasariu	23.05.2023	First version issued

Next review	Function	Date
After two years or pursuant to (i) the enactment of any relevant legislation/ (ii) the adoption of any internal policy/regulation or (iii) issuance of any judicial decision, adversely impacting the provisions hereof		March 2025/ as required, whichever is sooner