

Part I: To Be Completed by the Third Party Business Associate

This questionnaire is intended to ensure that DJEH Holdings¹ (“DJEH”) and its business associates comply with the DJEH Worldwide Anti-Corruption Policy and applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (“FCPA”). Failure to comply with applicable anti-corruption laws can result in criminal and civil exposures to both DJEH and to its employees, as well as to subcontractors, freelancers, agents, consultants, joint venture partners, or other third parties who are acting on behalf of DJEH (“Third Parties”).

The DJEH Worldwide Anti-Corruption Policy requires the following with regard to Third Parties that are subject to DJEH due diligence procedures:

- The Third Party and the DJEH account team must complete their respective sections of the Third Party Business Associates Due Diligence Questionnaire and return it to DJEH.
- Copies of the [DJEH Anti-Corruption Policy for Third Party Business Relationships](#) and the [DJEH “Summary of Global Anti-Corruption Statutes Applicable to DJEH Offices Worldwide”](#) must be provided to all Third Parties.
- Third Parties cannot perform work on behalf of DJEH with government agencies, ministries, or businesses owned wholly or in part by a government unless there is a signed Independent Contractor Agreement (or other applicable form of contract) which contains the required anti-corruption compliance provisions.

Please return the completed, signed questionnaire to DJEH.

RETURN TO:	
Attn:	Address:
Email:	
Phone:	City, State/Country, Postal Code:
Fax:	

Third Party Information:

Legal Name of Firm

Address

City, State/Country, Postal Code)

Phone Number

Web Address

IMPORTANT NOTE: Information provided in this questionnaire is confidential and intended for internal use by DJEH to evaluate the suitability of Third Parties who may be chosen to work on client engagements.

¹ Daniel J. Edelman Holdings, Inc. includes Daniel J. Edelman, Inc., StrategyOne, Inc. d/b/a Edelman Intelligence, Zeno Group, Assembly Media, Matter, Inc., United Entertainment Group Holdings, LLC (UEG), The K Group Public Relations Company, d/b/a Krispr Communications, Edible, Inc., Edelman Miami Latin America Corp., The H & W Group, d/b/a Salutem, The R Group Public Relations Company, d/b/a Revere, First & 42nd, Inc., and all operating companies under the Edelman family of companies (collectively referred to as “DJEH Holdings” or “DJEH” in this document).

Part I: To Be Completed by the Third Party

I. Business Profile and History

1. Describe the nature of the Third Party's business. What type of goods or services does the Third Party provide?
2. What are the approximate annual revenues of the Third Party?
3. How many employees does the Third Party have?
4. What countries does the Third Party operate in?
5. How many years has the Third Party been in business?

6. List related companies of the Third Party:

Note: For corporations, list parent/subsidiaries/affiliates

For individuals, list other companies you have an ownership in.

7. Does the Third Party plan to use any other companies on the proposed engagement, including subsidiaries, affiliates, partnerships or joint ventures of the Third Party, or individuals other than your own employees to perform services under the proposed agreement?

YES NO

- a. If YES, identify the name and address of the company or individual to be used, describe the relationship to the Third Party and the activities it will perform.

Name/Address	Relationship	Activities

8. Does the Third Party have a code of ethics and/or anti-corruption code? If so, please provide. *(this question is not applicable for individuals)*

YES NO Not applicable

9. If the Third Party has a compliance officer, please identify. *(this question is not applicable for individuals)*

II. Ownership and Key Employees

1. List the owners of the Third Party *(this question is not applicable to individuals)*.

NAME	TITLE

2. List the key officers and members of the Board of Directors for the Third Party
(this question is not applicable to individuals).

NAME	TITLE

3. List the Third Party's employees and managers who will be principally responsible for performing or supervising services under the proposed agreement.

NAME	TITLE

4. Have any of the individuals listed in your responses to questions II.1, II.2 or II.3 ever served or been employed by a government, agency of the government or corporation owned or controlled by the government involved in the contract?

YES NO

5. Are any of the individuals listed in your responses to questions II.1, II.2 or II.3 currently an employee of a DJEHH client, an official of a political party or a candidate for public office?

YES NO

6. Do any of the individuals listed in your responses to questions II.1, II.2 or II.3 have a familial relationship (including joint ownership of a company), either by blood or marriage, with any employee of a DJEHH client or government official who would be in a position to influence the purchase of services from DJEHH or otherwise provide a commercial advantage to you or DJEHH?

YES NO

7. Do any of the individuals listed in your responses to questions II.1, II.2 or II.3 have a business relationship (including joint ownership of a company) together with any employee of a DJEHH client or government official who would be in a position to influence the purchase of services from DJEHH or otherwise provide a commercial advantage to you or DJEHH?

YES NO

8. If YES to II.4, II.5, II.6, or II.7, please provide details (name of individual, relationship, corporate entity/government agency entity name, title/position held, date of service, etc.).

9. Would any employee of a DJEHH client, government employee, relative of a government employee, political party official or current candidate for public office be entitled to any part of the compensation or fee to be paid by DJEHH under the proposed agreement? If so, provide details.

YES NO

10. Does any employee of a DJEHH client, government employee, relative of a government employee, political party official or current candidate for public office have any interest or stand to benefit in any way as a result of the proposed agreement? If so, provide details.

YES NO

11. Has the Third Party or any of the individuals listed in your responses to questions II.1, II.2 or II.3 ever been (i) interviewed, deposed or subpoenaed in connection with, (ii) been declared to be guilty of or (iii) paid any fine, civil penalty or settlement amount relating to the violation or possible violation of any laws, rules or regulations governing the following:

- a. Purchase or sale of goods or services to or by any government, or
- b. Donations, contributions, honoraria or any other form of remuneration to any government employee, political party, political party official or candidate for public?

YES NO

12. Has the Third Party or any of the individuals listed in your responses to questions II.1, II.2 or II.3 during the past 10 years been the subject of any legal proceedings involving allegations of fraud, bribery or corruption or criminal proceeding or criminal investigation of any kind?

YES NO

13. If YES to II.11 or II.12, please provide details (e.g., date of claim(s), type and amount of claims, result of the investigation or proceeding) on a separate page.

III. Reference information

1. Provide banking reference information for your company.

Bank Name:	
Street Address:	
City:	State/Province:
Country:	Postal Code:
Telephone:	Facsimile:
Account Name:	
Account Number:	

2. Provide three business references.

Company Name:	
Contact Name:	Contact Title:
Street Address:	
City:	State/Province:
Country:	Postal Code:
Telephone:	Facsimile:

Company Name:	
Contact Name:	Contact Title:
Street Address:	
City:	State/Province:
Country:	Postal Code:
Telephone:	Facsimile:

Company Name:	
Contact Name:	Contact Title:
Street Address:	
City:	State/Province:
Country:	Postal Code:
Telephone:	Facsimile:

IV. Acknowledgment of DJEH anti-corruption policies

1. The Third Party has received copies of (1) the DJEH ["Anti-Corruption Policy for Third Party Business Relationships"](#), and (2) the ["Summary of Global Anti-Corruption Statutes Applicable to DJEH Offices Worldwide"](#) and certifies to the following:
 - a. That the DJEH "Anti-Corruption Policy for Third Party Business Relationships", and the "Summary of Global Anti-Corruption Statutes Applicable to DJEH Offices Worldwide" will be provided to all employees and managers of the Third Party who are principally responsible for work under the proposed agreement.

YES NO
 - b. That all employees and managers of the Third Party who are principally responsible for work under the proposed agreement will be required to read, understand, and agree to comply with all applicable anti-corruption regulations and the DJEHH Worldwide Anti-Corruption Policy in performing services related to the proposed agreement;

YES NO
 - c. That the Third Party will reaffirm its commitment to compliance with applicable anti-corruption regulations by signing an anti-corruption certification form (upon request by DJEHH);

YES NO
 - d. That the Third Party's compensation is only for the proposed services provided by the Third Party and is not to be passed on to third-parties;

YES NO

- e. That the Third Party will not subcontract, transfer or assign any portion of the proposed agreement to any third party without the express written consent from DJEHH?
 YES NO
- f. That the Third Party will report to the DJEHH Office of the General Counsel² if it should learn of, or have reason to suspect, any violation of applicable anti-corruption laws or DJEHH's Anti-Corruption Policy for Third Party Business Associates has occurred in connection with the proposed agreement.
 YES NO

BY SIGNING BELOW I CERTIFY THAT I HAVE PERFORMED SUCH PROCEDURES AND INQUIRIES AS NECESSARY TO ENSURE THAT THE ANSWERS PROVIDED IN THIS DOCUMENT ARE ACCURATE AND COMPLETE TO THE BEST OF MY KNOWLEDGE	
Signature:	Date:
Printed Name:	Email Address:
Title:	Phone Number:

* Please scan and email the completed, signed questionnaires to your Regional Corporate Compliance Representative:

- **EMEA:** [Natalie Butler](#), Regional Director, Internal Audit and Compliance, EMEA
(located in London)
- **APAC:** [OPEN](#), Regional Director, Internal Audit and Compliance, APAC
(located in Hong Kong)
- **All other regions:** [Randy Corley](#), Global Compliance Officer
(located in Chicago)
- AND –

Please “cc” both forms to [Randy Corley](#), DJEHH’s Global Compliance Officer and [Dru Deering](#), DJEH Global Compliance Coordinator. You should maintain the original in the contract file of the Subcontractor.

² DJEH Office of the General Counsel:

Shan Bhati, General Counsel / shan.bhati@djeholdings.com / 312-233-1332

Peter Petros, General Counsel / peter.petros@djeholdings.com / 312-233-1306