## **ENGAGEMENT**

## **PROCEDURE**

STEP 1
THIRD PARTY
REGISTRATION

Local compliance officer performs Sanctions Screening.

Nominator fills in Third Party Registration Form and the Due Diligence

Questionnaire and sends all input to the Chief Compliance Officer.



STEP 2
RISK
ASSESMENT
& DUE
DILIGENCE

Chief Compliance Officer receives input and performs Risk Assessment, consisting of completing Risk Assessment Matrix and assessment al other known information. Chief Compliance Officer may perform further due diligence in this stage.



STEP 3

RECOMMENDATION

Chief Compliance Officer issues recommendation based on Risk Assessment. Recommendation entails, if any, Mitigation Steps, which may include further due diligence. Recommendation is issued using Form.



STEP 4
MITIGATION
STEPS

Nominator and local compliance officer implement Mitigation Steps.

Results of implementation must be reported to Chief Compliance Officer by Nominator using Form. Chief Compliance Officer provides assistance.



STEP 5
APPROVAL

Chief Compliance Officer issues approval, taking into account the implementation of Mitigation Steps and all circumstances and information. Nominator follows-up on approval (i.e. terminate Engagement Procedure or continue towards contracting).