



## **Coodal Due Diligence Check Policy**

### **1. Purpose**

Coodal is committed to maintaining the highest standards of integrity and accountability in all its operations. This policy outlines the due diligence process to ensure compliance with legal and ethical standards when engaging with individuals, partners, donors, suppliers, and other stakeholders.

### **2. Scope**

This policy applies to all employees, trustees, volunteers, and third parties working with or on behalf of Coodal.

### **3. Due Diligence Process**

Coodal will conduct due diligence checks in the following circumstances:

- Before forming partnerships with other organisations.
- Before accepting significant donations.
- When recruiting employees, trustees, and volunteers in key positions.
- Before engaging with suppliers and contractors.

The due diligence process includes, but is not limited to:

- Identity verification through official documentation.
- Background checks, including criminal records where necessary.
- Financial integrity checks, including assessment of funding sources.
- Reviewing potential conflicts of interest.
- Checking against relevant sanctions and exclusion lists.

#### **4. Risk Assessment**

A risk-based approach will be applied to determine the level of due diligence required. Higher-risk engagements will require enhanced checks and senior management approval.

#### **5. Record Keeping**

All due diligence checks and their outcomes will be documented and securely stored by data protection laws. Records will be reviewed periodically to ensure ongoing compliance.

#### **6. Non-Compliance**

Any concerns arising from due diligence checks must be escalated to senior management. If risks cannot be mitigated to an acceptable level, Coodal reserves the right to decline or terminate the engagement.

#### **7. Review and Updates**

This policy will be reviewed annually or in response to regulatory changes to ensure it remains effective and up to date.

#### **Approval and Implementation**

This policy has been approved by the Board of Trustees and is effective as of 19/7/25.

**S.Shanmugadasan**

**19.07.2025**