



Anti-Corruption and Anti-Bribery

Onboarding Questionnaire

Please print, complete and return the form to Pathologists Lancet Kenya P.O. Box 117-00202 Upper Hill - Nairobi.
Alternatively fill in the online form www.lancet.co.ke

Section 1: BUSINESS INFORMATION

1.1 Name of the business entity (Company/Organization)

Entity's Full legal Name: _____

Doing Business As Name or Trade/Marketing Name (if Applicable): _____

Street Address : _____

Principal Place of Business: _____

City: _____

Postal Code: _____

Telephone: _____

Website: _____

Services Provided by the Entity _____

1.2 Name of the personnel (including owners and directors) who are authorized to make binding decisions for the Entity and enter into contract with clients

(i)

Contact Person: _____

Email: _____

Job Title: _____

(ii)

Contact Person: _____

Email: _____

Job Title: _____

Section 2: Entity Registration Information

- 2.1** Are there mandatory business registrations, government agency licenses and/or certifications required for the Entity to operate? Yes No
- 2.2** Date of Registration: _____
- 2.3** Please submit a copy of this registration in its original language:

Section 3: Ownership Information and Board Directors

- 3.1** Which of the following best describes your Entity/organization?
 Partnerships Limited Liability Company Joint Venture Not for Profit
- 3.2** Does your Entity have any owners who are individuals (i.e. not a corporation or other legal entity)? Yes No
Name: _____
Job Title: _____
Citizenship: _____
- 3.3** Does your Entity have any owners who are corporations or other legal entities (i.e. not an individual/person)? Yes No
Name: _____
Country of Incorporation: _____ Ownership Percentage: _____
- 3.4** Does your Entity have a Board of Directors? Yes No
Name: _____
Job Title: _____ Citizenship: _____
Name: _____
Job Title: _____ Citizenship: _____
Name: _____
Job Title: _____ Citizenship: _____

Section 4: Compliance Information

Pathologists Lancet Kenya code of conduct requires all vendors comply with the compliance requirements below:

Does your Entity

- 4.1** Have a written policy addressing bribery? Yes No
- 4.2** Have distribute their ethics and compliance (including anti-bribery) policies to its employees? Yes No
- 4.3** Have a system that allows their employees to ask questions or report concerns regarding ethical and compliance (including anti-bribery) matters? Yes No
- 4.4** Have conduct periodic assessments of ethical and compliance (including anti-bribery) risks? Yes No
- 4.4** Have a human rights policy or a formal commitment to respect human rights?
(This can include policies against forced labor, child labor, bonded labor, debt bondage, forced prison labor, slavery, servitude, or human trafficking)? Yes No

Section 5: Personnel

5.1 Total number of personnel (including managers and directors): _____

5.2 Does your Entity have personnel (including owners and directors already listed) who are authorized to make binding decisions for your Entity and enter into contracts with clients? Yes No

Name: _____

Job Title: _____ Citizenship: _____

Name: _____

Job Title: _____ Citizenship: _____

5.3 Does your Entity have personnel (including owners and directors already listed) who market or sell products/services to customers? Yes No

5.3 Please provide any additional useful and relevant information to your application for the due diligence review:

Section 6: Other Engagements

6.1 Does this contract pose a conflict of interest Yes No

6.2 Has any person listed previously in the questionnaire been in the military, including compulsory military service, in the last ten years? Yes No

6.3 Does any person listed previously in the questionnaire currently hold any position with, or have any duties for, any political party or political campaign? Yes No

6.4 Is any person listed previously in the questionnaire a candidate for any political office Yes No

6.5 Are any family members of any person listed previously in the questionnaire currently employed or otherwise engaged in any capacity by any government entity, including the military, or considered part of a royal family? Yes No

6.6 Are any family members of any person listed previously in the questionnaire employed by or have duties for any political party or political campaign? Yes No

6.7 Are any family members of any person listed previously in the questionnaire candidates for political office? Yes No

6.8 Has your Entity, or any business concern controlled by your Entity, or, to your knowledge, any of your owners, key employees, officers or directors, ever been convicted of violating any rules or regulations governing the purchase or sale of goods or services to or by any government? Yes No

6.9 Has your Entity, or any business concern controlled by your Entity, or, to your knowledge, any of your owners, key employees, officers or directors, ever been interviewed, deposed or subpoenaed in connection with any litigation or investigation involving any government regulations? Yes No

6.10 Has your Entity, or any business concern controlled by your Entity, or, to your knowledge, any of your owners, key employees, officers or directors, ever been found guilty of any violations of securities or commodities trading laws? Yes No

Section 6: Other Engagements

- 6.11** Has your Entity, or any business concern controlled by your Entity, or, to your knowledge, any of your owners, key employees, officers or directors, ever been found guilty of violating any law governing donations, contributions, honoraria or any other form of remuneration to any government official or any individual working for a commercial enterprise? Yes No
- 6.12** Has your Entity, or any business concern controlled by your Entity, or, to your knowledge, any of your owners, key employees, officers or directors, ever been found guilty of any violation of any laws governing the regulation of antitrust practices? Yes No
- 6.14** Has your Entity, or any business concern controlled by your Entity, or, to your knowledge, any of your owners, key employees, officers or directors, ever been charged, interviewed or found guilty concerning income tax evasion? Yes No
- 6.15** Has your Entity or any business concern controlled by your Entity, or, to your knowledge, any of your owners, key employees, officers or directors, ever been convicted of a felony or other criminal act for any matter not listed above? Yes No
- 6.16** Excluding traffic charges, has any of your owners, key employees, officers or directors, ever been arrested, charged, cited or held by law enforcement authorities regardless of whether the charge was dropped, dismissed or a verdict of not guilty was entered? Yes No
- 6.17** Has your Entity, or any business concern controlled by your Entity, or, to your knowledge, any of your owners, key employees, officers or directors, ever been debarred from competing for government contracts in any country? Yes No

Section 7: Financials

- 7.1** Does your Entity have a recent audited financial statement prepared by an external auditor? Yes No

Financial References:

Type:

Entity/Institution:

Name:

Contact Person:

Job Title:

Email:

Telephone:

Address:

Postal Code:

City:

Country:

State/Province:

Facsimile:

- 7.2** Are your Entity books and records maintained in accordance with generally accepted accounting practices? Yes No

- 7.3** Do you certify that your Entity is adequately financed and has sufficient resources to conduct business? Yes No

Section 8: Business References

(i) Entity/Institution: _____

Name: _____

Contact Person: _____

Job Title: _____

Email: _____

Telephone: _____

Address: _____

Postal Code: _____

City: _____

Country: _____

State/Province: _____

(ii) Entity/Institution: _____

Name: _____

Contact Person: _____

Job Title: _____

Email: _____

Telephone: _____

Address: _____

Postal Code: _____

City: _____

Country: _____

State/Province: _____

(iii) Entity/Institution: _____

Name: _____

Contact Person: _____

Job Title: _____

Email: _____

Telephone: _____

Address: _____

Postal Code: _____

City: _____

Country: _____

State/Province: _____

P.S.

Failure to submit the on board process questionnaire will be a factor in considering whether a supplier is deemed eligible to be registered as a Lancet Kenya supplier or to do business with the Lancet Kenya, in accordance with applicable Entity policies and procedures.

We encourage all Lancet Kenya suppliers to submit the questionnaire within the shortest time possible and also to improve their business practices in accordance with the principles set out in this Code of Conduct.

Section 9: Anti-Bribery Compliance Certification

The Entity and all individuals listed in this questionnaire are required to comply with the following.

- 9.1** Shall not, directly or indirectly, break or seek to evade the laws or regulations of any country in, through or with which they do business or seek to do business Yes No
- 9.2** All of the individuals listed in this questionnaire are aware that the fact that an illegal act is a “customary business practice” in any country is not sufficient justification for violation of this provision Yes No
- 9.3** The Entity and all individuals listed in this questionnaire shall not offer, promise, provide or gift any pecuniary or other advantage, whether directly or through intermediaries, to a public official, political candidate or party official or any private sector employee, in order that the official or employee act or refrain from acting in relation to the performance of their duties, in order to obtain or retain business or any other business advantage Yes No
- 9.4** The Entity and all individuals listed in this questionnaire shall not offer or make facilitating payments to government officials in order to encourage them to expedite a routine governmental task that they are otherwise required to undertake unless the action sought is an urgent matter concerning health or safety. Yes No
- 9.4** The Entity and all individuals listed in this questionnaire recognize that participation in facilitating payments (payments to a government official made in order to have that official undertake a routine government action) increases the demand for more facilitating payments and spreads corruption in the business community Yes No
- 9.5** The Entity and all individuals listed in this questionnaire shall not “kick-back” any portion of a contract payment to employees of other parties to a contract or use other vehicles such as subcontracts, purchase orders or consulting agreements to channel payments to government officials, political candidates, employees of other parties to a contract, their relatives or business associates. Yes No
- 9.6** The Entity and all individuals listed in this questionnaire shall avoid any relationship or activity that might impair, or appear to impair, their ability to render objective and appropriate business decisions in the performance of their jobs. Yes No
- 9.7** The Entity and all individuals listed in this questionnaire shall not make any political contributions in order to obtain an unlawful business advantage and shall comply with all public disclosure requirements. Yes No
- 9.8** The Entity and all individuals listed in this questionnaire shall only make charitable contributions for bona fide charitable purposes and only where permitted by the laws of the country in which the contribution is made. They shall not make any charitable contributions in order to obtain an unlawful business advantage. Yes No
- 9.9** The Entity and all individuals listed in this questionnaire shall reject any direct or indirect request by a public official, political party, party official, or private sector employee for undue pecuniary or other advantage, to act or refrain from acting in relation to his or her duties. Yes No

Contacts:

Any questions related to this Code of Conduct can be addressed through the below contacts.

CHIEF COMPLIANCE OFFICER	Mr. Peter Murigi	peter.murigi@lancet.co.ke
COUNTRY MANAGER	Ms. Eunice Ombati	eunice.ombati@lancet.co.ke
CHIEF EXECUTIVE OFFICER	Dr. Ahmed Kalebi	ahmed.kalebi@lancet.co.ke
SENIOR MANAGEMENT TEAM	C/O Ms. Lorna Zutti	senior.management@lancet.co.ke

Main Laboratory/Head Office

Fifth Avenue Office Suites 5th

Ngong Avenue (Opp. Traffic HQ)

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