



"Feed the world. Sustainably."

Sustainable Rice Platform Due Diligence Policy

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Purpose and Scope

The purpose of the **Sustainable Rice Platform Due Diligence Policy** is to mitigate risks to the Sustainable Rice Platform (SRP) while also preventing SRP from directly or indirectly causing or contributing to harmful impacts on people, the environment, and society.

This Policy establishes a risk-based approach to due diligence, enabling SRP to exercise informed and objective assessments of the risks that unknown organizations and individuals may present to SRP. This approach helps ensure SRP's people, operations, programs, and partnerships do not directly or indirectly lead to adverse effects, such as human rights violations, illicit financing, and corruption, among other harmful externalities.

SRP follows this approach using the Due Diligence Protocol below, which engages the Subject Questionnaire (Annex A) and Screening Tool (Annex B) to know the organizations and individuals with whom SRP interacts and apply that knowledge to relevant decision-making and monitoring procedures.

This Policy shall apply to current and prospective Members, non-governmental and private sector partners, and select service providers and consultants, collectively referred to as "subjects."

Terms and Definitions

Term	Definition
Anti-Money Laundering	(AML). Policies and strategies to identify, report, and prevent proceeds from criminal activity being disguised to appear licit or legal.
Countering Terrorist Financing	(CTF). Policies and strategies to identify, report, and prevent the solicitation or use of funds to support terrorist acts or organizations.
Anti-corruption	Policies and strategies to identify, report, and prevent dishonest or illicit behavior, typically by people in power, to realize private gain.
Due diligence	Practical processes and steps to provide reasonable assurance that SRP knows organizations and individuals with whom it interacts and the risks they present to people, the natural environment, and society.
Know Your Customer/ Client	(KYC). The principle that, to decrease the likelihood of causing or contributing to harmful impacts, it is essential for SRP to learn about the entities and individuals with whom it interacts.
Subject	An organization or individual to which SRP applies due diligence.
Subject Questionnaire	A varying battery of questions that organizations and individuals are required to answer as a prerequisite for formal engagement with SRP.
Screening Tool	A document, for staff use only, to objectively score and tabulate a subject's risk to SRP and determine the suitability of engagement.

Our Approach to Due Diligence

SRP is a multi-stakeholder membership organization comprised of supply chain actors; public sector institutions, including development and financial actors; civil society; and service, input, and equipment providers. It is also widely connected to local, national, regional, and transnational partners working in and around the global rice sector.

SRP has a duty of care to ensure it does not cause or contribute to harm by interacting with organizations and individuals that pose risks of illicit, dishonest, fraudulent, or otherwise harmful practices, including but not limited to human rights violations, environmental crimes, domestic or international money laundering, terrorist financing, fraud, bribery, and other forms of corruption.

SRP exercises this duty of care with prudence and efficiency, informed by its Risk Register, Risk Management Plan (RMP), and Procurement Policy.

SRP uses a risk-based, stepwise Protocol to conduct due diligence, consisting of five steps: *entry*, *information gathering*, *evaluation*, *decision*, and *monitoring*. This process enables SRP to assess its risk exposure by knowing—to the extent practicable—the organizations and individuals entering its orbit.

Importantly, SRP due diligence is more than a guardrail to avoid causing or contributing to harms. For all individuals and organizations, it provides a fair, transparent, and consistent assessment process; and for subjects that clear due diligence screening, it serves as the basis for productive and trusted interactions and relationships.

Due Diligence Protocol

1. **This Protocol applies to the following subjects: current and prospective Members, non-governmental and private sector partners, and service providers and consultancies in procurement Category C (above €25,000).**
2. The Secretariat shall prioritize due diligence for prospective subjects. For current subjects, i.e., organizations and individuals currently engaged with SRP, the Secretariat shall develop a timeline for applying the Protocol that balances the need for this Policy's implementation with the realities of processing a backlog.
3. For all subjects, the Protocol should be adapted to the severity and likelihood of adverse impacts, consistent with the RMP and Risk Register.
4. On a case-by-case basis, the Executive Director may deviate from the Protocol provided such deviations are minimal, documented, and justified. Deviations should be discussed with the Board Chair and/or Executive Committee.
5. The Secretariat shall ensure all data processed pursuant to the Protocol are stored in secure folders and accessed on a "need-to-know" basis, i.e., by due diligence screeners and authorizing personnel.

STEP 1—ENTRY

6. The Secretariat shall enter into this Protocol any applicable subject with whom it intends to engage (or continue to engage) on a formal basis.
7. The Secretariat shall have discretion over the timing of the subject's entry given that processes differ by the nature of the engagement and risks involved.

STEP 2—INFORMATION GATHERING

First-party information

8. The Secretariat shall require the subject to complete applicable sections of the Subject Questionnaire.
9. Applicable sections should differ by subject type (e.g., individual, organization), as well as the nature and scope of the potential engagement (e.g., Membership, partnership agreement, etc.). Such variations shall account for the top-level risks identified in the Risk Register and due diligence best practices.

Second-party information

10. The Secretariat shall gather further information from two references.
11. The Secretariat should engage references after the subject has returned the Subject Questionnaire to ask informed questions and gather information of value.
12. The Executive Director may waive references for current or prospective partners and service providers whose reputations are highly regarded. The waiver shall be documented and justified.

Third-party information

13. The Secretariat shall conduct desk research to corroborate information provided in the subject's application materials (if applicable), Subject Questionnaire, and from references. Desk research also serves to identify risks not previously known.
14. As part of its desk research, the Secretariat shall conduct the following:
 - a. Queries of search engines, news databases, or government registers, with an emphasis on risks arising from first- and second-party information gathering.
 - b. Subject queries in the following AML, CTF, and anti-corruption databases:
 - o European Union Sanctions Map
 - o United Kingdom HM Treasury Office of Financial Sanctions Consolidated List
 - o U.S. Dept. of the Treasury Office of Foreign Assets Control Sanctions List
 - o World Bank Listing of Ineligible Firms and Individuals.

STEP 3—EVALUATION

By this point in the Protocol, the Secretariat will have gathered desired information about the subject. The amount and detail of information will vary considerably by the type of subject and the nature and scope of the engagement.

15. Using only the information gathered pursuant to [Step 2](#), the due diligence screener shall apply the Screening Tool to evaluate the subject's suitability for engagement.
16. Based on the evaluation and taking into account what is known and unknown about the subject, the due diligence screener shall produce a recommendation for decision, accompanied by a brief justification.

STEP 4—DECISION

17. Decisions on current or prospective service providers or consultancies shall be authorized in accordance with the Procurement Policy.
18. Decisions on current or prospective Members or nongovernmental and private sector partners shall be authorized by the Executive Director or a designee.
19. Authorizing personnel shall make one of three decisions pertaining to the subject:
 - a. Clear the subject from due diligence screening and pursue engagement
 - b. Not clear the subject from due diligence screening and deny engagement
 - c. Return to [Step 2](#) to gather more information, such as requesting documents from the subject or conducting interviews or desk research.

STEP 5—MONITORING

20. If the decision is made to proceed with engagement, the Secretariat shall ensure any significant risks identified as a result of this Protocol are sufficiently monitored pursuant to the RMP and Risk Register.
21. If the decision is made to deny engagement with the subject, the Secretariat shall determine whether the severity and nature of the risk(s) identified merit blacklisting the subject from future interactions with SRP.

Review Schedule

The SRP Board will review this Policy at least annually and may amend it at any time. The Secretariat is responsible for reviewing the Subject Questionnaire and Screening Tool and adapting these instruments to reflect RMP, Risk Register, and Procurement Policy updates and due diligence best practices.

Related Documents

SRP Anti-Corruption Policy
SRP Due Diligence Subject Questionnaire
SRP Due Diligence Screening Tool
SRP Code of Conduct
SRP Procurement Policy
SRP Risk Management Plan
SRP Risk Register

Annex A: Due Diligence Subject Questionnaire

This Questionnaire must be completed by current and prospective Members, non-governmental and private sector partners, and service providers and consultancies in procurement Category C.

Part 1a: General Information (individuals)			
Full name:		Date:	
Current title:		Email:	
Current employer:		Phone:	
Mailing address:			
For what role are you tendering?	<input type="checkbox"/> Service provider <input type="checkbox"/> Consultant		
Part 1a comments (optional):			
Part 1b: General information (organizations)			
Legal name of organization:		Date of incorporation:	
Trading name, if different:		Country of domicile:	
Profit status of organization:	<input type="checkbox"/> For-profit <input type="checkbox"/> Non-profit		Legal form:
Mailing address:			
Website:			
Is the organization a subsidiary?	<input type="checkbox"/> No <input type="checkbox"/> Yes	If applicable, what is the name of the parent organization?	
What is the organization's intended role with SRP?	<input type="checkbox"/> Member <input type="checkbox"/> Partner <input type="checkbox"/> Service provider <input type="checkbox"/> Consultancy		
Part 1b comments (optional):			
Part 2: Past relationship with SRP (all)			
If applicable, please list any previous engagements, roles, or positions held in or with SRP and their respective dates:	<i>Engagement, role, or position</i>	<i>Dates</i>	
Part 2 comments (optional):			
Part 3a: Legal history (individuals)			
Have you ever been convicted of a criminal offence?	<input type="checkbox"/> No <input type="checkbox"/> Yes	Do you have any pending criminal cases against you?	<input type="checkbox"/> No <input type="checkbox"/> Yes
If you answered yes to any question in 3a, please describe the circumstances:			
Part 3a comments (optional):			

Part 3b: Legal history (organizations)			
Has the organization or its predecessor completed liquidation, receivership, bankruptcy, or dissolution proceedings in the last 10 years?	<input type="checkbox"/> No <input type="checkbox"/> Yes	Does the organization have any pending liquidation, receivership, bankruptcy, or dissolution proceedings?	<input type="checkbox"/> No <input type="checkbox"/> Yes
Has the organization been convicted of a civil or criminal offence in the last ten years?		<input type="checkbox"/> No <input type="checkbox"/> Yes	
If you answered yes to any question in Part 3b, please describe the circumstances:			
Part 3b comments (optional):			
Part 4: Institutional goals (organizations)			
What is organization's vision?			
What is organization's mission?			
What are the organization's goals over the next five years?			
Part 4 comments (optional):			
Part 5: Institutional resources (organizations)			
Does the organization publish an annual sustainability memorandum or report that discloses information on ESG or CSR performance?			<input type="checkbox"/> No <input type="checkbox"/> Yes
If applicable, is the sustainability memorandum or report based on a recognized reporting framework?	<input type="checkbox"/> No <input type="checkbox"/> Yes	If yes, please identify the reporting framework(s):	
Is the organization certified or verified against a leading social or environmental scheme?	<input type="checkbox"/> No <input type="checkbox"/> Yes	If yes, please identify the scheme(s):	
Does the organization maintain policies covering the following areas?			
a. Anti-corruption and/or fraud prevention and detection	<input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> In development		
b. Antitrust or competition compliance	<input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> In development		
c. Social safeguards (including child safeguarding)	<input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> In development		
d. Environmental safeguards	<input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> In development		
e. Gender equality	<input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> In development		
f. Data privacy and data protection	<input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> In development		
Part 5 comments (optional):			
Part 6: Multi-stakeholder engagement (organizations)			
Please list any other global multi-stakeholder organizations or initiatives of which the organization is a .member:			
Is the organization in arrears for any current membership?		<input type="checkbox"/> No <input type="checkbox"/> Yes <input type="checkbox"/> Not applicable	
If the organization provides in-kind contributions to any multi-stakeholder organization or initiative, please describe the scope and nature of the contribution:			
Part 6 comments (optional):			

Annex B: Due Diligence Screening Tool

The Screening Tool is for internal SRP use only. The Executive Director (ED) is responsible for assigning due diligence screening and authorization duties, pursuant to §15-18 of the Policy. Due diligence screeners and authorizers are reminded to adhere to the Conflict of Interest Policy. If a conflict arises during this process, the conflicted party shall notify the ED—or Chair if said party is the ED—and consult the Policy for guidance on recusal.

General Information					
Name of subject:			Subject ID:		
Nature of engagement:	<input type="checkbox"/> Membership <input type="checkbox"/> Project partner	<input type="checkbox"/> Consultant <input type="checkbox"/> Service provider	<input type="checkbox"/> Other:		
Membership category, if applicable:	<input type="checkbox"/> Public sector <input type="checkbox"/> Supply chain <input type="checkbox"/> Civil society <input type="checkbox"/> SIE providers				
Procurement amount, if applicable:					
Part A: Exclusionary Criteria			NA	No	Yes
1. Is the subject known to have committed AML, CTF, or anti-corruption violations?					
a. European Union Sanctions Map https://www.sanctionsmap.eu/#/main			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. U.K. HM Treasury Office of Financial Sanctions Consolidated List https://www.sanctionssearchapp.ofsi.hmtreasury.gov.uk/			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. U.S. Dept. of the Treasury's Office of Foreign Assets Control Sanctions List https://www.sanctionssearch.ofac.treas.gov/			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. World Bank Listing of Ineligible Firms and Individuals https://worldbank.org/en/projects-operations/procurement/debarred-firms			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
2. Does desk research indicate the subject is likely complicit in social harms, including human rights violations, within the last ten years?			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
3. Does desk research indicate the subject is likely complicit in environmental harms, within the last ten years?			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Part A Notes:					
Part B: Caution Criteria			NA	No	Yes
4. Is the subject in the bottom quantile of relevant World Benchmarking Alliance Benchmarks? https://worldbenchmarkingalliance.org/					
a. Corporate Human Rights Benchmark			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Gender Benchmark			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Access to Seeds Index			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Nature Benchmark			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
5. Is the subject in arrears for any current membership commitment?			<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

6. Does the subject maintain operations in any of the following sensitive industries or sectors: armaments or weapons, alcohol, tobacco, gambling, extractives, fossil fuels, chemicals, GMOs, or breast milk substitutes and marketing?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
7. Does the subject produce banned pesticides or herbicides?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
8. Has the subject been convicted of a criminal offence?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
9. Has the organization completed liquidation, receivership, bankruptcy, or dissolution proceedings, or is it undergoing any such proceeding currently?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
10. Is there an actual, perceived, or potential conflict of interest between the subject's due diligence screening and the interests of the screener or authorizer?			
Part B Notes:			
Part C: Positive Criteria (organizations only)	NA	No	Yes
11. Are the subject's vision, mission, and strategic goals compatible with SRP's mission and strategic goals?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
12. Does the subject publish an annual sustainability memorandum or report that discloses information on the subject's ESG or CSR performance?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
13. If applicable, is the disclosure based on a recognized reporting framework?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> CDP <input type="checkbox"/> GRI <input type="checkbox"/> Gold Standard <input type="checkbox"/> SASB <input type="checkbox"/> TCFD <input type="checkbox"/> Other:			
14. Does the subject maintain policies covering the following areas?			
a. Anti-corruption and/or fraud prevention and detection	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Antitrust or competition compliance	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Social safeguards (including child safeguarding)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Environmental safeguards	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Gender equality	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Data privacy and data protection	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
15. Is the subject certified against a leading social or environmental scheme?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
<input type="checkbox"/> ISO 14000 <input type="checkbox"/> ISO 26000 <input type="checkbox"/> B Corp. <input type="checkbox"/> AccountAbility 1000 <input type="checkbox"/> EDGE Certified <input type="checkbox"/> Other:			
16. Is the subject a participant of the United Nations Global Compact? www.unglobalcompact.org/participants/search	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Part C Notes:			

Scoring, Recommendation, and Decision			
Part A Guidelines:	<ul style="list-style-type: none"> • Subject only clears Part A if the number of Y's = 0. 		
Part B Guidelines (excl no. 10):	<ul style="list-style-type: none"> • The subject should clear Part B if the number of Y's = 0-2. • The subject should strongly be considered for denial if the number of Y's = 3-4. • The subject should be denied outright if the number of Y's = 5 or more. 		
Part C Guidelines:	<ul style="list-style-type: none"> • The subject should strongly be considered for denial if the number of Y's = 0-1. 		
Recommendation :	<input type="checkbox"/> Proceed <input type="checkbox"/> Deny <input type="checkbox"/> More information required		
Justification:			
Screener name:			
Screener signature:		Date of signature:	
Decision:	<input type="checkbox"/> Proceed <input type="checkbox"/> Deny <input type="checkbox"/> More information required		
Justification (if different):			
Authorizer name:			
Authorizer signature:		Date of signature:	