

Due diligence at Sage: how our Partners play their role

Please be aware of your obligation to follow Sage's due diligence procedures so that both you and Sage comply with sanctions and anti-bribery laws. This means asking customers to provide:

1. Registered business address;
2. Primary location of company operations (if different to registered business address);
3. Country from which payments will be made;
4. Total number of users and breakdown of number of users located in Prohibited or Conditional Territories (as defined in the list issued by Sage from time to time).

If the response to items 1, 2 or 3 is that the location is a Prohibited Country, then no business can take place with this customer and they cannot be onboarded.

If the response to items 1, 2 or 3 is that the location is a Conditional Territory, due diligence must be carried out on the customer before that customer is onboarded. The following information must then be obtained from the customer and provided to Sage in order for Sage to conduct the due diligence check:

- A Due Diligence Form (to be filled in by the customer themselves);
- Certificate of Incorporation (for the contracting customer business);
- Proof of identity for any named beneficial owners (individuals who own or control 25% or more of the organisation, if any).

If the due diligence check comes back clear then the customer can be onboarded. If the due diligence check identifies issues, Sage may direct that the customer cannot be onboarded.

If the response to item 4 is that the customer has ANY users in a Prohibited Country, then no business can take place with this customer and they cannot be onboarded.

If the response to item 4 is that the customer has at least 50% of their end users in Conditional Territories, due diligence must be carried out on the customer before that customer is onboarded, and the same process as set out in paragraph three above applies.