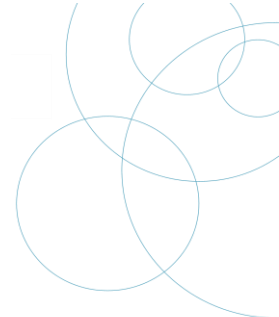


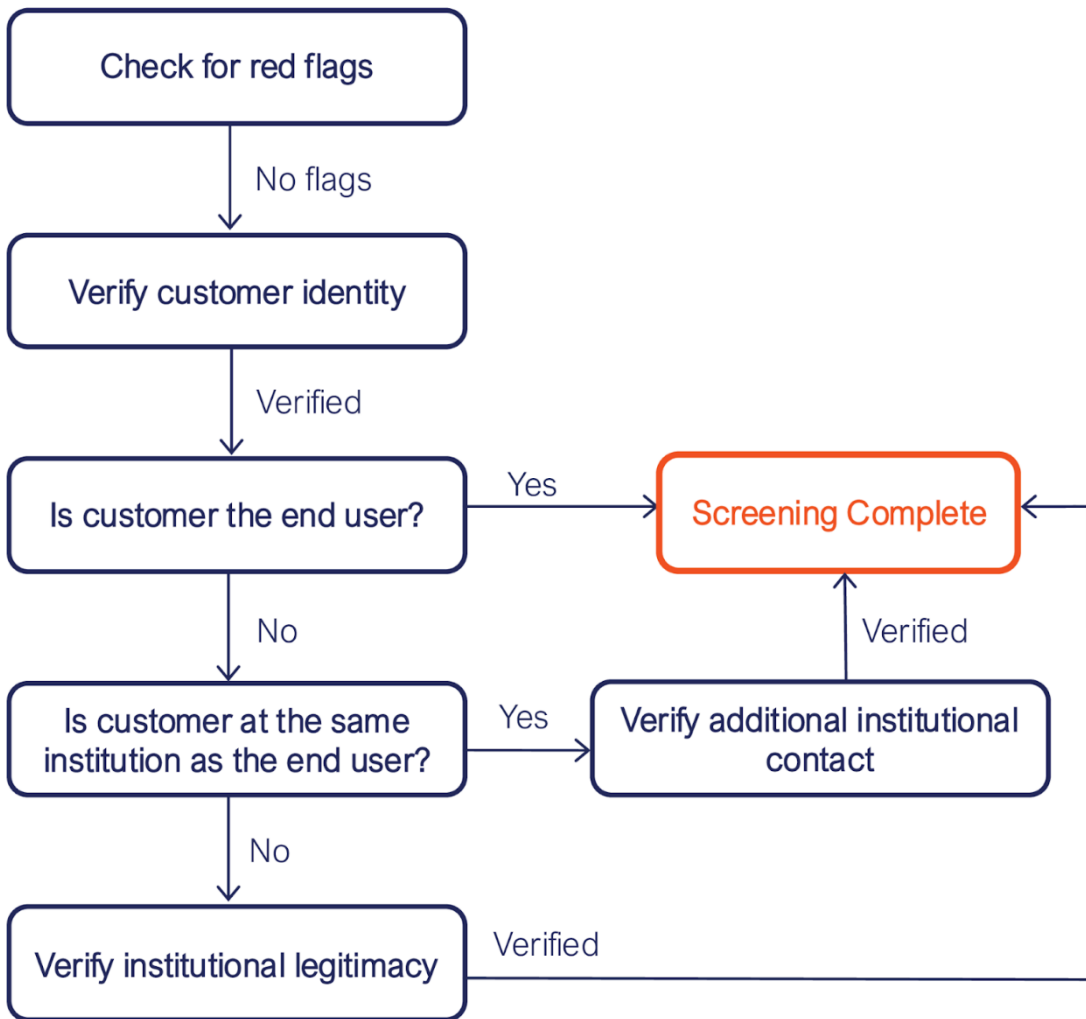
NEW CUSTOMER FORM | SCREENING DECISION GUIDE



NEW CUSTOMER FORM

This guidance provides a step-by-step process for evaluating information provided by customers on the New Customer Form. This process can help nucleic acid providers ensure that they have conducted due diligence to verify their customers' identity and legitimacy. It is likely that decisions on whether or not to accept customers will vary across providers based on their risk tolerance, experience with different types of customers, and broader context. Although this guidance provides suggestions on how due diligence can be met, decision making for each customer is ultimately the responsibility of the provider.

OVERVIEW



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STEP-BY-STEP INSTRUCTIONS

1. Check for red flags

Refer to Question 1.1 in Part 1: Customer Information

Red flags indicate that the order may be intended for an inappropriate end-use, customer, or destination.

Verification step: Check for Red Flags	Outcome
Check if the customer's country or institution appears on restricted parties, sanctions, or export control lists. If found, reject the customer OR verify legal compliance for this specific sale.	
Check if the customer's name appears on restricted parties, sanctions, or export control lists. If found, reject the customer or request more information to establish that they are not the person on the watch list.	
<p>Check if the customer has made any unusual requests, which could include:</p> <ul style="list-style-type: none">- Labeling or shipping procedures (e.g. requests to misidentify the goods on the packaging, requests to change the recipient's name after the order is placed, but before it is shipped)- Method of payment (e.g., payment in cash or through a non-bank third party)- Confidentiality conditions, particularly with respect to the final destination or the destruction of transaction records <p>If found, reject the customer OR request more information to verify their identity and to establish why these requests are necessary.</p>	

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2. Verify customer identity

Refer to Question 1.1 in Part 1: Customer Information

Verification step: Verify the provided information with some <u>due diligence</u> .	Outcome
<p>Verify contact information</p> <p>Verify the email address or phone number by establishing successful contact (for example, by sending a code that is reported back).</p>	
<p>Verify shipping information</p> <p>Verify the shipping address by checking that the address is in the expected geographic location and is consistent with information from the website provided. Some providers will wish to verify that there is a legitimate biomedical business or research justification for the location.</p>	
<p>Check institutional affiliation</p> <p>If the customer is not affiliated with an institution or if the email address or shipping address do not match the institution, check that the customer has a reasonable explanation.</p>	
Due diligence: final determination	

3. Is customer the end user?

Refer to Question 1.2 in Part 1: Customer Information

Verification step: Establishing End User	Outcome
If "Yes", no additional checks are needed. Screening steps for new customer onboarding are complete.	Screening complete
If "No" is checked, ensure that the customer has filled out Part 2.	Continue verification

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4. Is customer at the same institution as the end user?

Refer to Questions 2.1 and 2.2 in Part 2: Customers Ordering for Other End Users

<i>Verification step: Establishing Relationship between Customer and End User</i>	<i>Outcome</i>
Check that the type of institution indicated in Question 2.1 is consistent with the information provided elsewhere in this form.	
For Question 2.2, if the customer indicates that they are at the same institution as the end user, check for completion of Section 2.3.	
For Question 2.2, if the customer indicates that they are not at the same institution, check for completion of Section 2.4.	

5A. Verify additional institutional contact

Refer to Question 2.3 in Part 2: Customers Ordering for Other End Users

<i>Verification step: Verify the provided information with some <u>due diligence</u>.</i>	<i>Outcome</i>
Verify institutional contact by checking that the email address, phone number, and/or website is associated with the institution. If questions remain, use a search engine to determine that the individual listed is associated with the institution or contact the customer to clarify.	
Due diligence: final determination	
Screening is complete.	

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5B. Verify institutional legitimacy

Refer to Question 2.4 in Part 2: Customers Ordering for Other End Users

<i>Verification step: Verify the provided information with some <u>due diligence</u>.</i>	<i>Outcome</i>
Check the documentation with some <u>due diligence</u> to ensure that the institution or company is legitimate, for example, by verifying documentation for at least one of the standards (checkboxes) provided on the form.	
If the customer is sending or transferring to other countries, check if the customer's country or institution appears on restricted parties, sanctions, or export control lists. If found, reject the customer OR establish that it is legal to sell to this customer.	
Due diligence: final determination	
Screening is complete.	