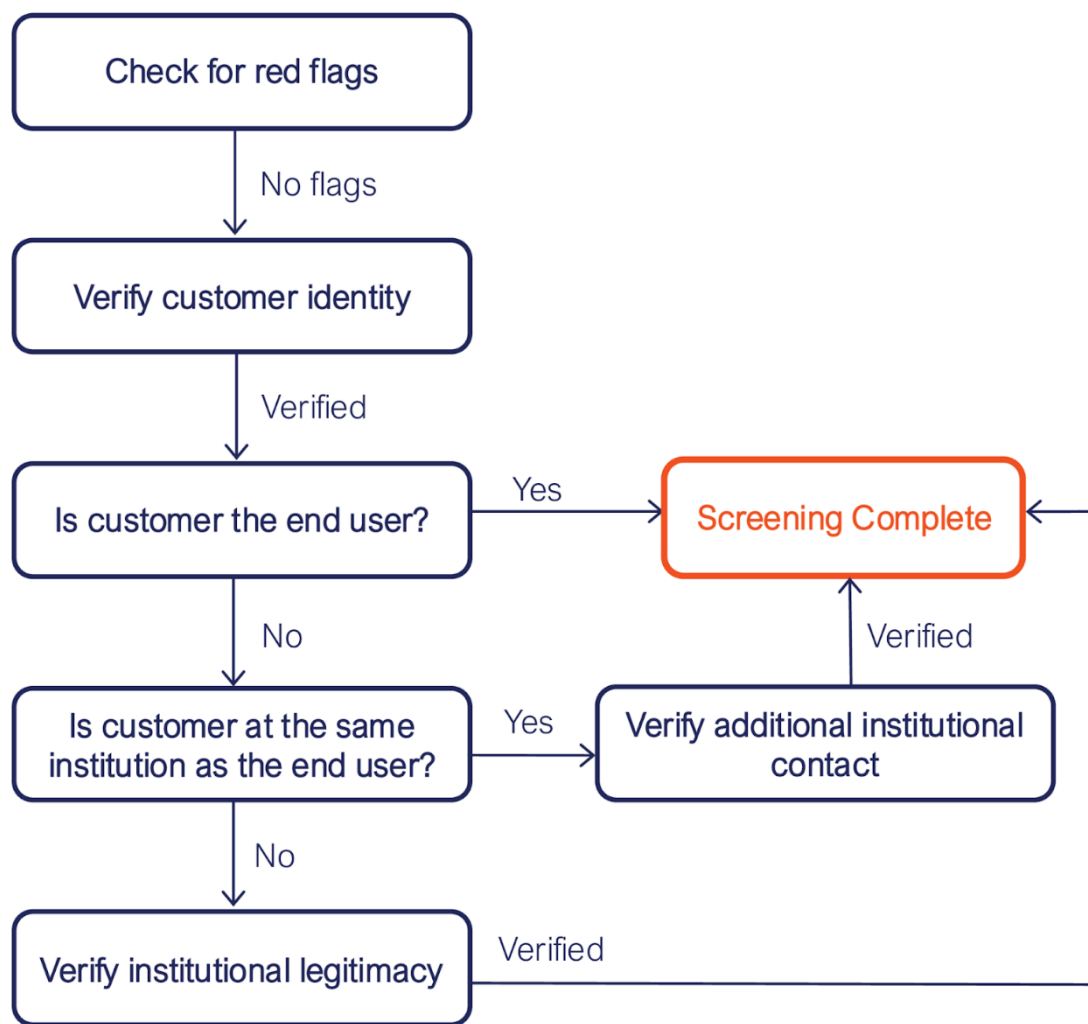


# NEW CUSTOMER FORM | SCREENING DECISION GUIDE

## 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



## 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
<p>Check the customer's country, name, and institution against your country's restricted parties or sanctions lists. Sanctions may be defined on a national, regional, or international level; many but not all countries implement the <a href="#">United Nations Security Council Consolidated List</a> of sanctions. Sanctions are also defined by regional bodies such as the <a href="#">European Union</a> and <a href="#">African Union</a> and some countries (around 45, in <a href="#">one estimate</a>) implement national sanctions lists.</p>	
<p>Check if the customer has made any unusual requests, which could include:</p> <ul style="list-style-type: none"> <li>- 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)</li> <li>- Method of payment (e.g., payment in cash, through a non-bank third party or using a cryptocurrency) or offering to pay using unusually favorable payment terms, such as a higher-than-expected price</li> <li>- Confidentiality conditions, particularly with respect to the final destination or the destruction of transaction records</li> <li>- Reagents or materials for synthesis (mirror nucleic acids, non-canonical amino acids, reconfiguring standard reagents)</li> </ul> <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*

<i>Verification step: Verify the provided information with some <u>due diligence</u>.</i>	<i>Outcome</i>
Verify contact information  <i>Verify the email address or phone number by establishing successful contact (for example, by sending a code that is reported back).</i>	
Verify shipping information by: <ul style="list-style-type: none"><li>- Using a global map like OpenStreetMap, Google Maps, or Apple Maps to check that the address is in the expected location</li><li>- Checking it is consistent with addresses listed on the website provided by the customer</li><li>- Optionally, using a tool such as Google Maps API, Loqate, or Melissa to verify that the address is not residential.</li></ul>	
Check institutional affiliation  <i>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.</i>	
Due diligence: final determination	

## 3. Is customer the end user?

*Refer to Question 1.2 in Part 1: Customer Information*

<i>Verification step: Establishing End User</i>	<i>Outcome</i>
If "Yes", no additional checks are needed. Screening steps for new customer onboarding are complete.	<i>Screening complete</i>
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

Verification step: Verify the provided information with some <u>due diligence</u> .	Outcome
<p>Check the documentation to ensure the institution or company is legitimate.</p> <p><i>The appropriate level of due diligence may vary depending on your relationship with the customer. We recommend requiring and reviewing documentation for at least one of the indicators of legitimacy, i.e. confirm that the institution satisfies at least one of the following criteria:</i></p> <ul style="list-style-type: none"> <li>- Is an established legal entity</li> <li>- Has a mission or purpose that includes life sciences</li> <li>- Provides biosafety oversight and training</li> <li>- Is part of the scientific community</li> <li>- Has obtained regulatory approval or official certification</li> </ul>	
<p>If the customer sends the nucleic acids you provide to a different country, this may have additional export control implications. You may wish to confirm that you will not be impacted by “re-export controls” when shipping to this customer.</p>	
Due diligence: final determination	
Screening is complete.	