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BAT Due Diligence - Affiliated Third Parties

Using the “Add Affiliate” function in Coupa

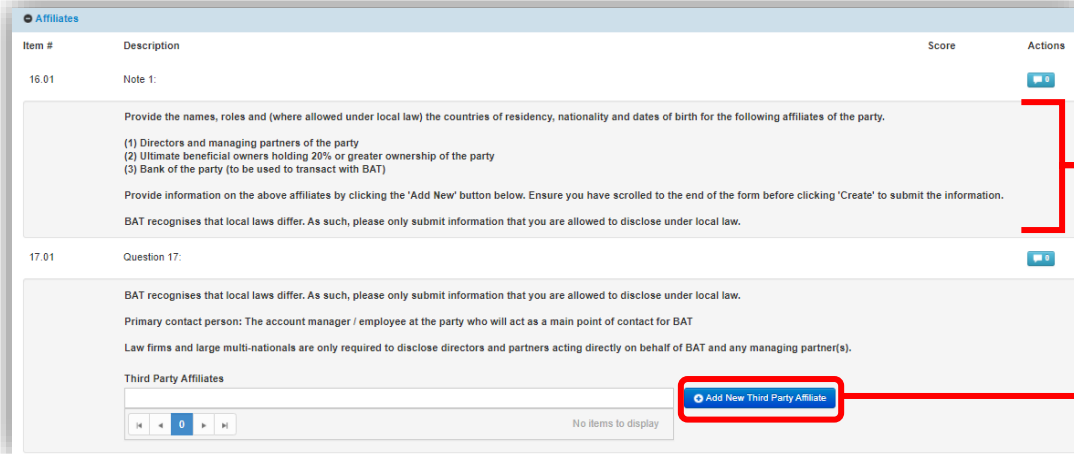
As part of completing BATs Due Diligence questionnaire, you will be required to submit the details of any (or all) of the following types of Affiliated Third Parties.

- Primary contact person of the party (e.g., the account manager who will be working directly with BAT)
- Directors and managing partners of the party
- Ultimate beneficial owners holding 50% or greater ownership of the party (e.g. individuals who own the organisation / company)
- Key employees of the party who will act directly on behalf of BAT
- Bank of the party (to be used to transact with BAT)
- Authorised representatives of the party **(customers only)**
- Affiliated companies of the party **(customers only)**
- Other parties involved in the supply of BAT Products (e.g. shipping companies & custom agents **(customers only)**)

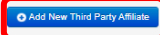
For the purposes of this questionnaire, an **Affiliate** can be any Individual or Organisation that meets any of the criteria of the above.

The details of the above must be provided in the “Affiliates” Section of the form, using the **Add New Third Party Affiliate** button:

Step 1. Click the **Add New Third Party Affiliate** button to open the Affiliate detail entry box



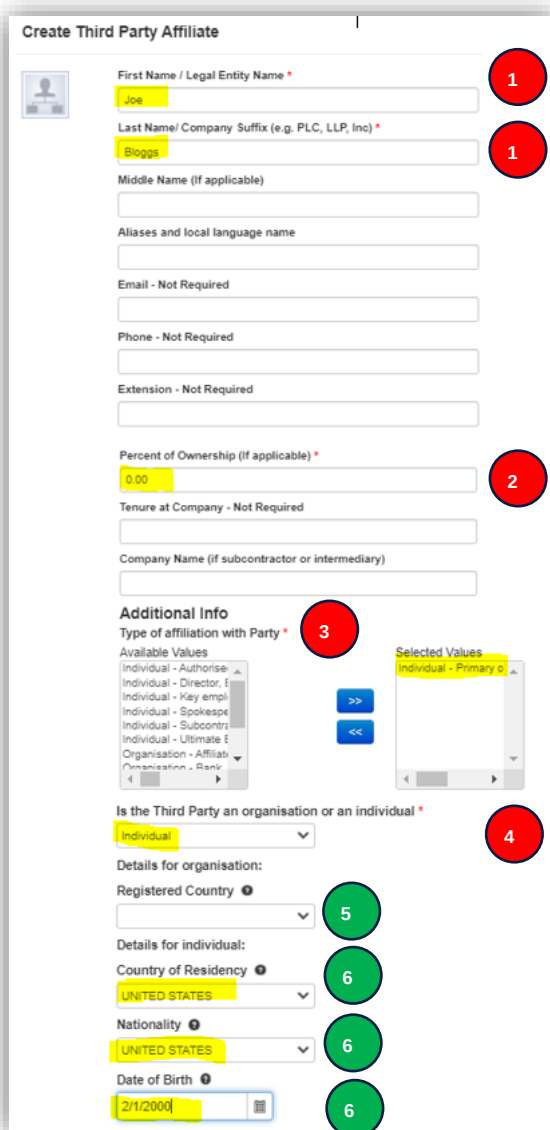
Affiliates

Item #	Description	Score	Actions
16.01	Note 1: Provide the names, roles and (where allowed under local law) the countries of residency, nationality and dates of birth for the following affiliates of the party. (1) Directors and managing partners of the party (2) Ultimate beneficial owners holding 20% or greater ownership of the party (3) Bank of the party (to be used to transact with BAT) Provide information on the above affiliates by clicking the 'Add New' button below. Ensure you have scrolled to the end of the form before clicking 'Create' to submit the information. BAT recognises that local laws differ. As such, please only submit information that you are allowed to disclose under local law.		
17.01	Question 17: BAT recognises that local laws differ. As such, please only submit information that you are allowed to disclose under local law. Primary contact person: The account manager / employee at the party who will act as a main point of contact for BAT Law firms and large multi-nationals are only required to disclose directors and partners acting directly on behalf of BAT and any managing partner(s). Third Party Affiliates  No items to display		

This section will provide the details of Affiliates that you will be required to provide details for

This button will open the Create new third party affiliate entry box.

Step 2: Once the Create new Third Party Affiliate entry box is open, **provide the details for your affiliates.**



Create Third Party Affiliate

Personal Information:

- First Name / Legal Entity Name *
- Last Name/ Company Suffix (e.g. PLC, LLP, Inc) *
- Middle Name (If applicable)
- Aliases and local language name
- Email - Not Required
- Phone - Not Required
- Extension - Not Required

Ownership:

- Percent of Ownership (If applicable) *
- Tenure at Company - Not Required
- Company Name (if subcontractor or intermediary)

Additional Info:

- Type of affiliation with Party *
- Available Values: Individual - Authorise, Individual - Director, Individual - Key empl, Individual - Spokespe, Individual - Subcontr, Individual - Ultimate, Organisation - Affiliat, Organisation - Bank
- Selected Values: Individual - Primary c

Details for organisation/individual:

- Is the Third Party an organisation or an individual *
- Registered Country
- Country of Residency
- Nationality
- Date of Birth

The Create new Third Party Affiliate entry box is presented to you to submit the details of your affiliates.

You must complete all Mandatory fields to complete the entry box. These are indicated with a red asterisk *. All other fields marked as 'Not required' do not need to be completed.

The mandatory fields are

- For individuals:** First & Last name
For organisations: Legal Entity Name and Suffix (eg PLC, GMBH, Pvt Ltd, LLP)
- Percentage of ownership of your organisation – if applicable
- Type of Affiliation with party
- Whether the affiliate is an individual or organisation

There are also some optional fields which, if completed, will help us expediate your due diligence:

- Optional for organisations:** Registered country
- Optional for individuals:** Residency, Nationality and DoB

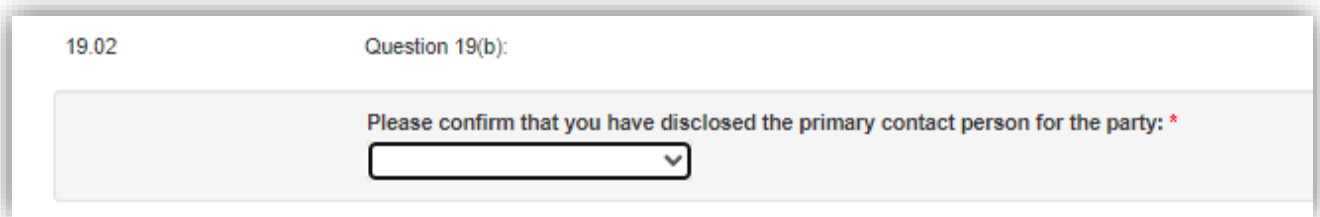
Step 3: Once the Details of the affiliate are completed, you can now select the **Create** button at the bottom of the entry box.



The affiliate record is now created. You should **complete this form for each affiliate requested at the top of the question** (e.g. each director, beneficial owner).

Step 4: Confirm you have submitted your affiliates

Once you have submitted all required affiliates You can now proceed to answer **Yes** to the subsequent question which is asking for confirmation that the relevant affiliate information has been disclosed.



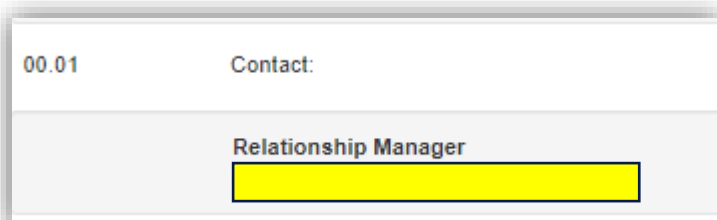
19.02 Question 19(b):

Please confirm that you have disclosed the primary contact person for the party: *

If the Affiliate section is not completed correctly, or all details are not provided, BAT will not be able to proceed with the required due diligence. Please ensure to complete this section carefully and fully for all required affiliates.

Note, if for any reason any of the affiliate details cannot be provided, you must select No or N/A. You will be required to provide a reason for this.

You can contact your BAT account manager if you require any further support. They can be identified at the top of your questionnaire.



00.01 Contact:

Relationship Manager

Worked Example

If a Primary Contact is being added as an affiliate:



Create Third Party Affiliate

First Name / Legal Entity Name *

Joe

Last Name/ Company Suffix (e.g. PLC, LLP, Inc) *

Bloggs

Middle Name (If applicable)

Aliases and local language name

Email - Not Required

Phone - Not Required

Extension - Not Required

Percent of Ownership (If applicable) *

0.00

Tenure at Company - Not Required

Company Name (if subcontractor or intermediary)

Additional Info

Type of affiliation with Party *

Available Values

- Individual - Authorise
- Individual - Director, t
- Individual - Key empl
- Individual - Spokespe
- Individual - Subcontr
- Individual - Ultimate t
- Organisation - Affiliat
- Organisation - Partn

>>

<<

Selected Values

- Individual - Primary c

Is the Third Party an organisation or an individual *

Individual

Details for organisation:

Registered Country

Details for individual:

Country of Residence

UNITED STATES

Nationality

UNITED STATES

Date of Birth

2/1/2000

19.02

Question 19(b):

Please confirm that you have disclosed the primary contact person for the party: *

Yes

Note, if for any reason any of the affiliate details cannot be provided, you must select No or N/A. You will be required to provide a reason for this.

BAT Due Diligence - Tiers affiliés

Utilisation de la fonction "Ajouter un affilié" dans Coupa

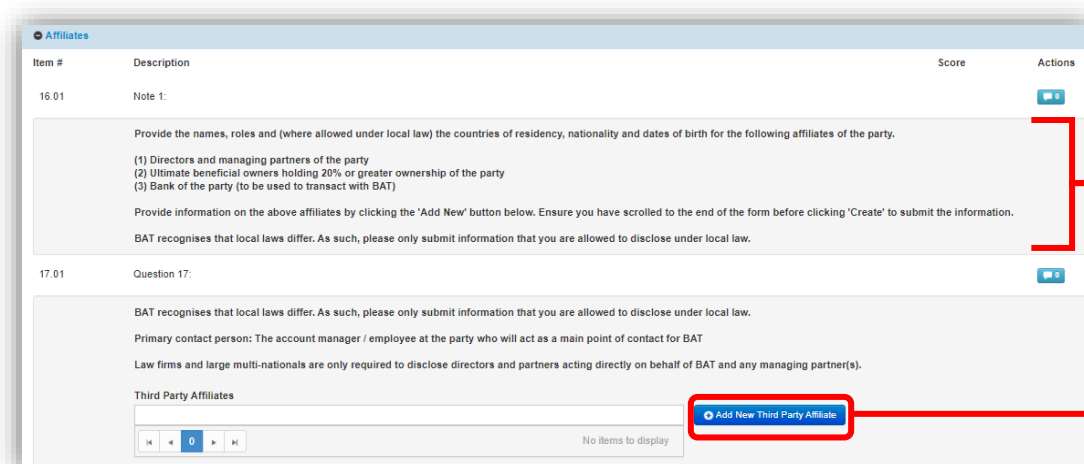
Dans le cadre du questionnaire de Diligence de BAT, il vous sera demandé de soumettre les détails de l'un (ou de tous) les types de Tiers Affiliés suivants.

- Personne de contact principale de la partie (par exemple, le gestionnaire de compte qui travaillera directement avec le BAT).
- Directeurs et partenaires de gestion de la partie
- Bénéficiaires ultimes détenant 50 % ou plus de la partie (par exemple, les individus qui possèdent l'organisation/la société).
- Les employés clés de la partie qui agiront directement au nom de la MTD.
- Banque de la partie (à utiliser pour effectuer des transactions avec la MTD)
- Représentants autorisés de la partie **(clients uniquement)**
- Sociétés affiliées de la partie **(clients uniquement)**
- Autres parties impliquées dans la fourniture de produits MTD (par exemple, les compagnies maritimes et les agents en douane **(clients uniquement)**).

Pour les besoins de ce questionnaire, un affilié peut être tout individu ou organisation qui répond à l'un des critères ci-dessus.

Les détails de ce qui précède doivent être fournis dans la section "Affiliés" du formulaire, en utilisant le bouton "Ajouter un nouvel affilié tiers". Ajouter un nouvel affilié tiers :

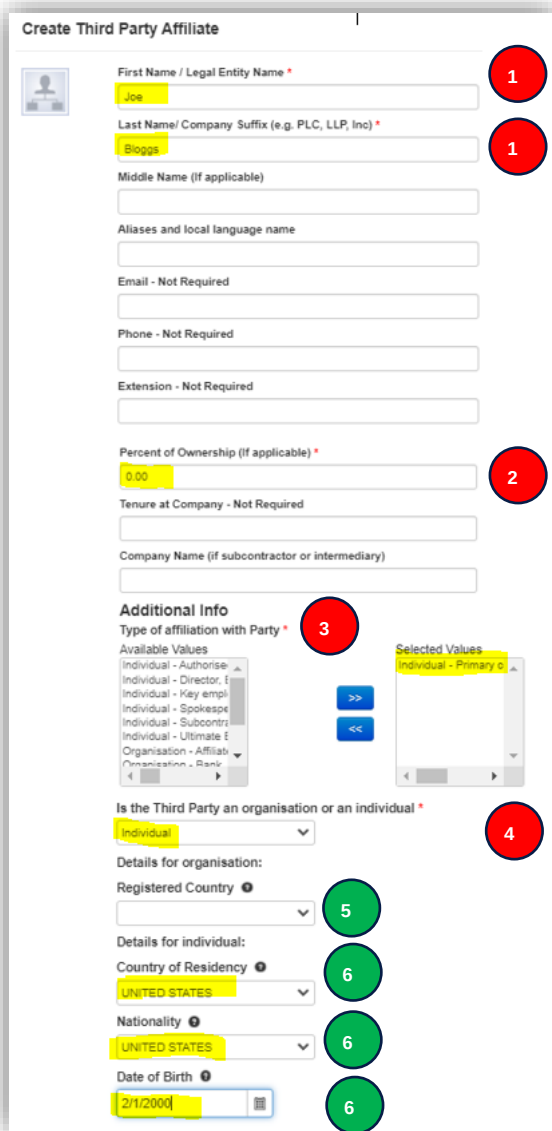
Étape 1. Cliquez sur le bouton **Add New Third Party Affiliate** pour ouvrir la zone de saisie des détails de l'affilié.



Cette section fournit les détails des affiliés pour lesquels vous devrez fournir des informations.

Ce bouton ouvrira la boîte de saisie Créer un nouveau tiers affilié.

Étape 2 : Une fois que la boîte de saisie Créer un nouvel affilié tiers est ouverte, fournissez les détails de vos affiliés.



The screenshot shows the 'Create Third Party Affiliate' form. It includes fields for First Name / Legal Entity Name, Last Name/ Company Suffix, Middle Name, Aliases, Email, Phone, Extension, Percent of Ownership, Tenure at Company, and Company Name. There is also an 'Additional Info' section with a dropdown for 'Type of affiliation with Party' and a list of 'Available Values'. Below this, there are dropdowns for 'Registered Country', 'Country of Residency', 'Nationality', and 'Date of Birth'. The form is annotated with numbered callouts: 1 points to the First Name field, 2 points to the Percent of Ownership field, 3 points to the 'Type of affiliation with Party' dropdown, 4 points to the 'Is the Third Party an organisation or an individual' dropdown, 5 points to the 'Registered Country' dropdown, and 6 points to the 'Country of Residency' dropdown.

Le champ de saisie Créer un nouvel affilié tiers vous est présenté pour soumettre les détails de vos affiliés.

Vous devez remplir tous les champs obligatoires pour remplir le champ de saisie. Ils sont indiqués par un astérisque rouge *. Tous les autres champs marqués "Non requis" ne doivent pas être remplis.

Les champs obligatoires sont

1) **Pour les particuliers:** Prénom et nom
Pour les organisations: Nom et suffixe de l'entité juridique (par exemple PLC, GMBH, Pvt Ltd, LLP)

2) Pourcentage de propriété de votre organisation - le cas échéant

3) Type d'affiliation avec le parti

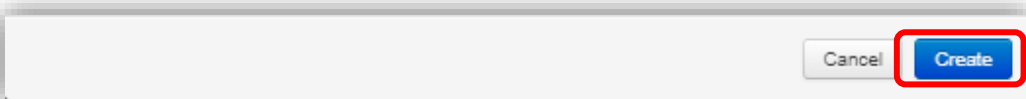
4) Si l'affilié est un individu ou une organisation

Il y a également des champs facultatifs qui, s'ils sont remplis, nous aideront à accélérer votre diligence raisonnable :

5) **Facultatif pour les organisations :** Pays d'enregistrement

6) **Facultatif pour les particuliers :** Résidence, Nationalité et DoB

Étape 3 : Une fois les détails de l'affilié complétés, vous pouvez maintenant sélectionner le bouton Créer en bas de la zone de saisie.

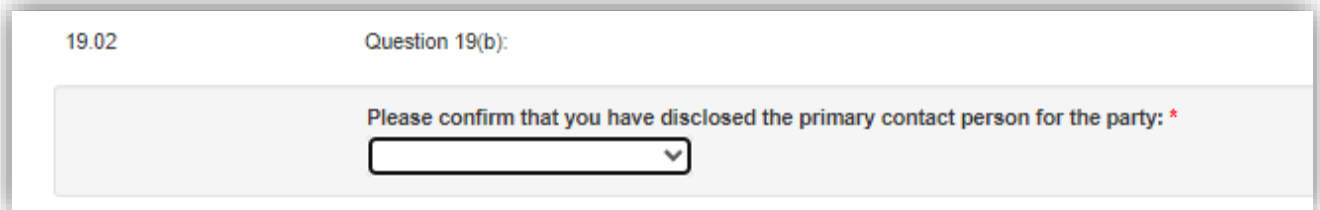


The screenshot shows the bottom of the form with two buttons: 'Cancel' and 'Create'. The 'Create' button is highlighted with a red rectangle.

L'enregistrement de l'affilié est maintenant créé. Vous devez remplir ce formulaire pour chaque affilié demandé en haut de la question (par exemple, chaque directeur, chaque bénéficiaire effectif).

Étape 4 : Confirmer que vous avez soumis vos affiliés:

Une fois que vous avez soumis tous les affiliés requis, vous pouvez maintenant répondre Oui à la question suivante qui demande la confirmation que les informations pertinentes sur les affiliés ont été divulguées.



19.02 Question 19(b):

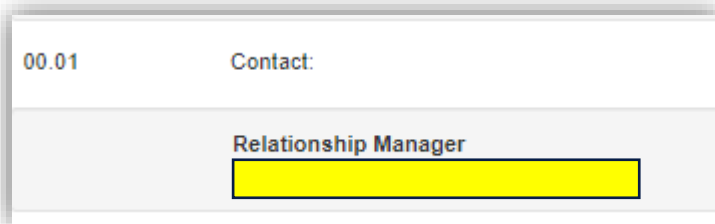
Please confirm that you have disclosed the primary contact person for the party: *

Si la section relative aux affiliés n'est pas remplie correctement, ou si tous les détails ne sont pas fournis, le BAT ne sera pas en mesure de procéder à la diligence requise. Veuillez vous assurer de remplir cette section avec soin et de manière complète pour tous les affiliés requis.

Remarque : si, pour une raison quelconque, vous ne pouvez pas fournir les informations relatives à l'affilié, vous devez sélectionner Non ou N/A.

Il vous sera demandé d'en donner la raison.

Vous pouvez contacter votre gestionnaire de compte BAT si vous avez besoin d'une aide supplémentaire. Vous pouvez l'identifier en haut de votre questionnaire.



00.01 Contact:

Relationship Manager

BAT Due Diligence - Terceiros afiliados

Usando a função "Adicionar afiliado" no Coupa

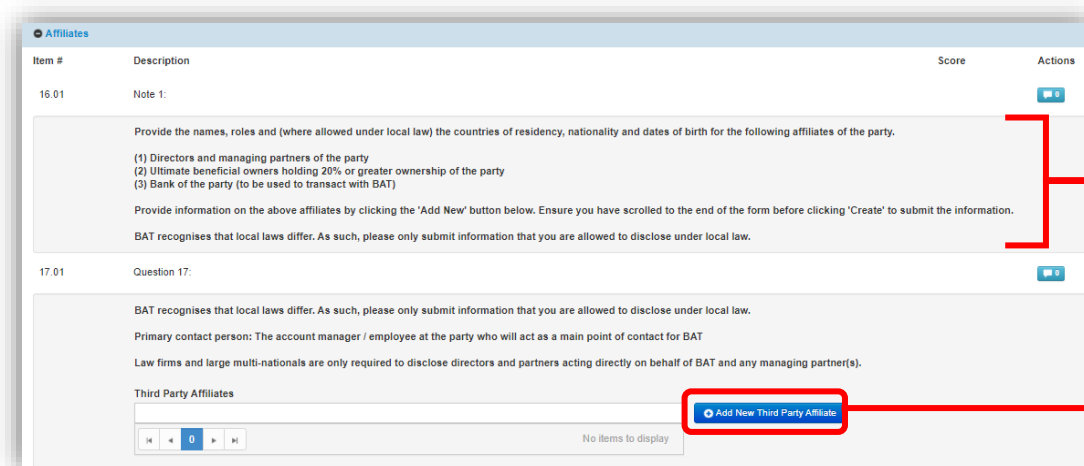
Como parte do preenchimento do questionário BATs Due Diligence, você deverá apresentar os detalhes de qualquer (ou de todos) os seguintes tipos de Terceiros Afiliados.

- Pessoa de contato principal da parte (por exemplo, o gerente de conta que estará trabalhando diretamente com a BAT)
- Diretores e sócios gerentes do partido
- Proprietários beneficiários finais detentores de 50% ou mais da propriedade da parte (por exemplo, indivíduos que possuem a organização/empresa)
- Principais funcionários da parte que atuarão diretamente em nome da BAT
- Banco do partido (a ser usado para fazer transações com BAT)
- Representantes autorizados da parte (somente clientes)
- Empresas afiliadas da parte (somente clientes)
- Outras partes envolvidas no fornecimento de produtos BAT (por exemplo, empresas de navegação e agentes alfandegários (somente clientes)

Para os fins deste questionário, um Afiliado pode ser qualquer indivíduo ou organização que atenda a qualquer um dos critérios acima.

Os detalhes do acima devem ser fornecidos na seção "Afiliados" do formulário, utilizando o Adicionar novo botão de afiliação de terceiros:

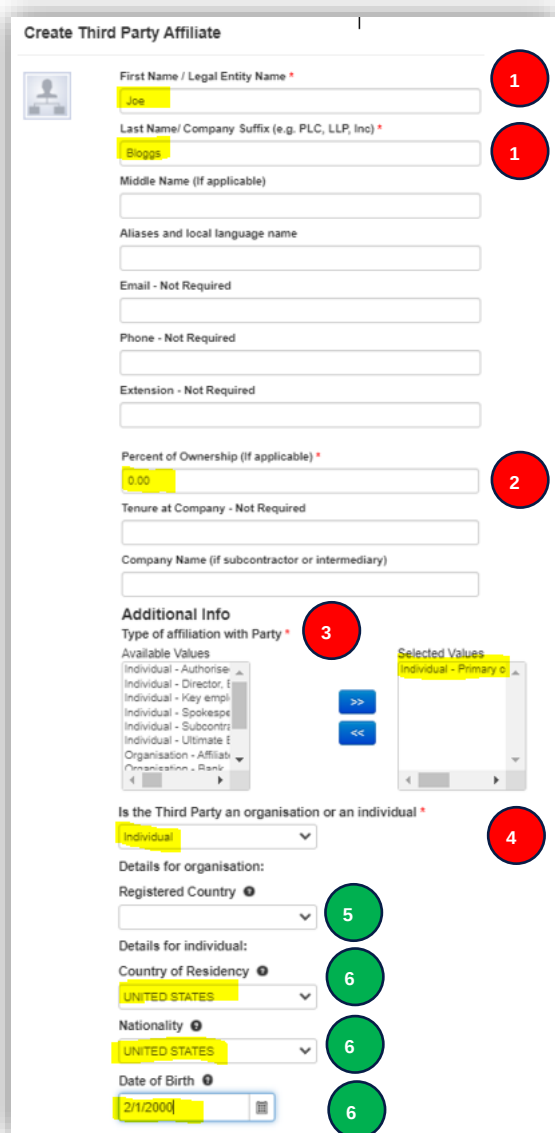
Passo 1. Clique no botão Add New Third Party Affiliate para abrir a caixa de entrada de detalhes do Afiliado.



Esta seção fornecerá os detalhes dos Afiliados para os quais você será solicitado a fornecer

Este botão abrirá a caixa de entrada Criar nova afiliação de terceiros.

Passo 2: Uma vez que a caixa de entrada Criar nova filial de terceiros estiver aberta, forneça os detalhes para suas afiliadas.



The screenshot shows the 'Create Third Party Affiliate' form. Red circles with numbers 1 and 2 point to the 'First Name / Legal Entity Name' and 'Last Name/ Company Suffix' fields, respectively. A red circle with number 3 points to the 'Type of affiliation with Party' dropdown. A red circle with number 4 points to the 'Is the Third Party an organisation or an individual' dropdown. Green circles with numbers 5, 6, 6, and 6 point to the 'Registered Country', 'Country of Residency', 'Nationality', and 'Date of Birth' fields, respectively.

A caixa de entrada Criar novas afiliadas de terceiros é apresentada a você para enviar os detalhes de suas afiliadas.

Você deve preencher todos os campos obrigatórios para completar a caixa de entrada. Estes são indicados com um asterisco vermelho *. Todos os outros campos marcados como "Não obrigatório" não precisam ser preenchidos.

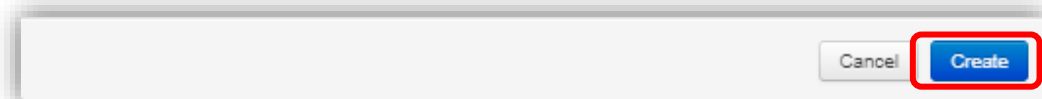
Os campos obrigatórios são

- 1) Para indivíduos: Nome e sobrenome
Para organizações: Nome da pessoa jurídica e Sufixo (por exemplo, PLC, GMBH, Pvt Ltd, LLP)
- 2) Porcentagem de propriedade de sua organização - se aplicável
- 3) Tipo de Afiliação com o partido
- 4) Se o afiliado é um indivíduo ou uma organização

Há também alguns campos opcionais que, se preenchidos, nos ajudarão a agilizar sua devida diligência:

- 5) Opcional para organizações: País cadastrado
- 6) Opcional para indivíduos: Residência, Nacionalidade e DoB

Passo 3: Uma vez que os Detalhes do afiliado estejam completos, você pode agora selecionar o botão Criar na parte inferior da caixa de entrada.

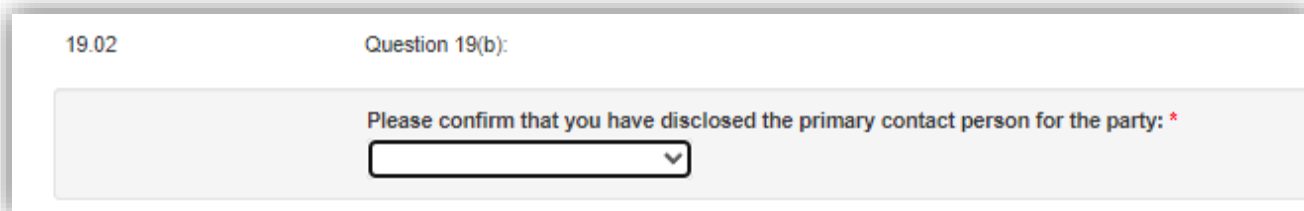


The screenshot shows the bottom of the form with two buttons: 'Cancel' and 'Create'. The 'Create' button is highlighted with a red rectangle.

O registro de afiliado é agora criado. Você deve preencher este formulário para cada afiliado solicitado no topo da questão (por exemplo, cada diretor, proprietário beneficiário).

Etapa 4: Confirme que você enviou suas afiliadas

Uma vez enviadas todas as afiliadas necessárias, você pode agora responder Sim à pergunta subsequente que pede a confirmação de que as informações relevantes da afiliada foram divulgadas.



19.02 Question 19(b):

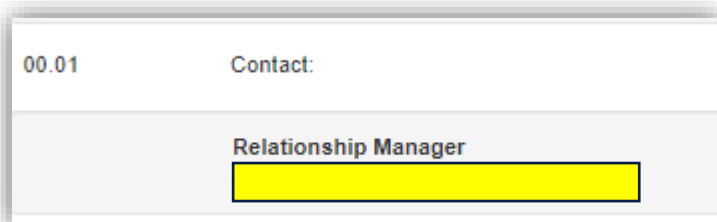
Please confirm that you have disclosed the primary contact person for the party: *

Se a seção Afiliada não for completada corretamente, ou se todos os detalhes não forem fornecidos, a BAT não será capaz de proceder com a devida diligência exigida. Por favor, certifique-se de completar esta seção cuidadosa e completamente para todos os afiliados requeridos.

Observação: se, por qualquer motivo, algum dos detalhes da filial não puder ser fornecido, você deve selecionar Não ou N/A.

Você deverá fornecer um motivo para isso.

Você pode entrar em contato com seu gerente de conta BAT se precisar de qualquer outro suporte. Eles podem ser identificados na parte superior de seu questionário.



00.01 Contact:

Relationship Manager

BAT Due Diligence - Terceras partes afiliadas

Utilizar la función "Añadir afiliado" en Coupa

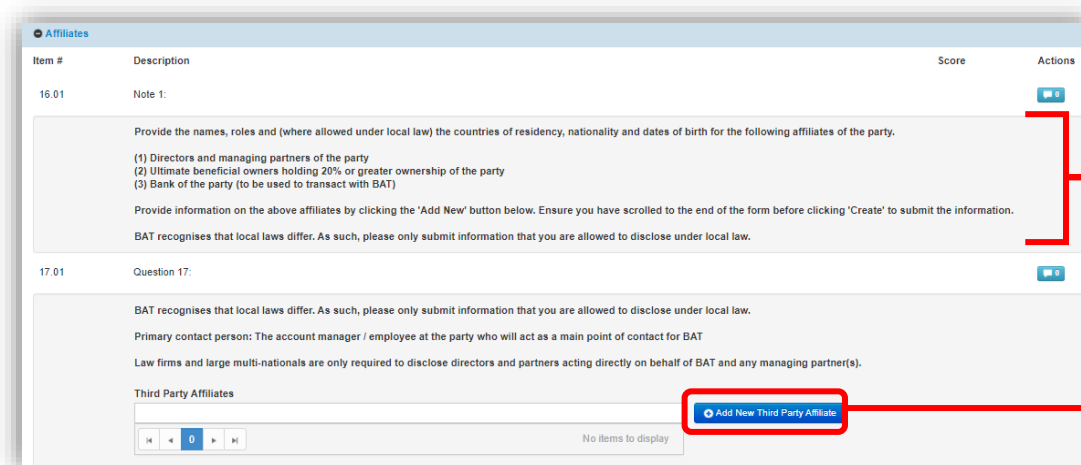
Como parte de la cumplimentación del cuestionario de Diligencia Debida de BAT, se le pedirá que presente los detalles de cualquiera (o de todos) los siguientes tipos de Terceros Afiliados.

- Persona de contacto principal de la parte (por ejemplo, el gestor de cuentas que trabajará directamente con BAT)
- Directores y socios gestores de la parte
- Propietarios finales que posean el 50% o más de la propiedad de la parte (por ejemplo, personas que posean la organización/empresa)
- Empleados clave de la parte que actuarán directamente en nombre de BAT
- Banco de la parte (que se utilizará para realizar transacciones con BAT)
- Representantes autorizados de la parte (sólo clientes)
- Empresas afiliadas a la parte (sólo clientes)
- Otras partes implicadas en el suministro de productos BAT (por ejemplo, empresas de transporte y agentes de aduanas (sólo clientes)
- A efectos de este cuestionario, un afiliado puede ser cualquier individuo u organización que cumpla cualquiera de los criterios anteriores.

Los detalles de lo anterior deben proporcionarse en la sección "Afiliados" del formulario, utilizando el botón

Añadir nuevo afiliado de terceros:

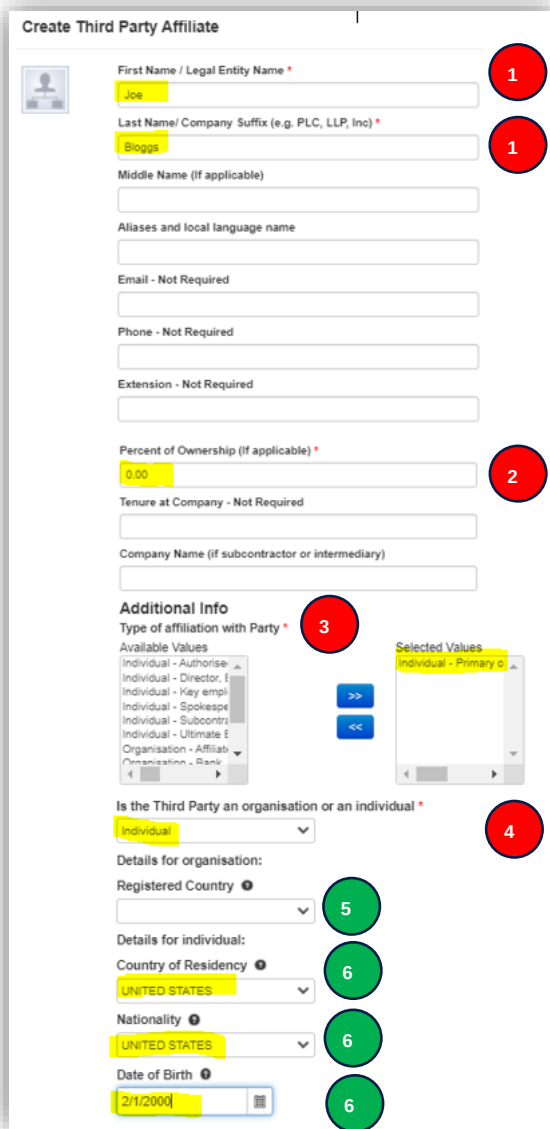
Paso 1. Haga clic en el botón Añadir nuevo afiliado de terceros para abrir el cuadro de entrada de detalles del afiliado



En esta sección se indican los datos de los Afiliados para los que deberá proporcionar datos

Este botón abrirá el cuadro de creación de una nueva afiliación de

Paso 2: Una vez abierto el cuadro de creación de nuevos afiliados de terceros, proporcione los detalles de sus afiliados.



The screenshot shows the 'Create Third Party Affiliate' form. It includes fields for personal and organizational details, with red circles 1-4 highlighting mandatory fields and green circles 5-6 highlighting optional fields.

- 1** First Name / Legal Entity Name *
- 1** Last Name/ Company Suffix (e.g. PLC, LLP, Inc) *
- 2** Percent of Ownership (If applicable) *
- 3** Type of affiliation with Party *
- 4** Is the Third Party an organisation or an individual *
- 5** Registered Country
- 6** Country of Residency
- 6** Nationality
- 6** Date of Birth

El cuadro de entrada Crear nuevo afiliado de terceros se presenta para que envíe los detalles de sus afiliados.

Debe rellenar todos los campos obligatorios para completar el cuadro de entrada. Estos se indican con un asterisco rojo *. Todos los demás campos marcados como "no obligatorios" no necesitan ser completados.

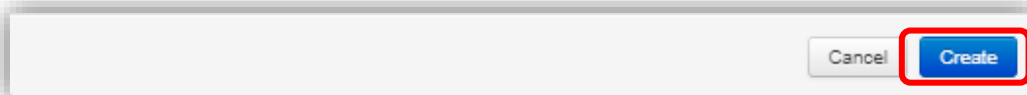
Los campos obligatorios son

- 1) Para personas físicas: Nombre y apellidos
Para organizaciones: Nombre y sufijo de la entidad jurídica (por ejemplo, PLC, GMBH, Pvt Ltd, LLP)
- 2) Porcentaje de propiedad de su organización - si procede
- 3) Tipo de afiliación con el partido
- 4) Si el afiliado es un individuo o una organización

También hay algunos campos opcionales que, si se completan, nos ayudarán a agilizar su diligencia debida:

- 5) Opcional para organizaciones: País registrado
- 6) Opcional para personas físicas: Residencia, nacionalidad y DoB

Paso 3: Una vez completados los detalles del afiliado, ahora puede seleccionar el botón Crear en la parte inferior del cuadro de entrada.

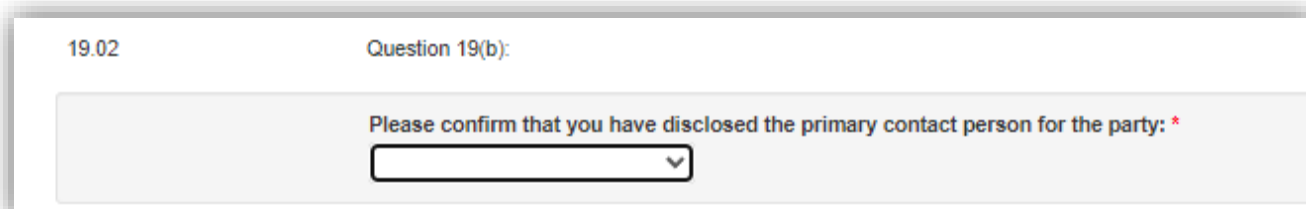


The screenshot shows the bottom of the form with two buttons: 'Cancel' and 'Create'. The 'Create' button is highlighted with a red rectangle.

Ahora se crea el registro de afiliados. Debe rellenar este formulario para cada afiliado solicitado en la parte superior de la pregunta (por ejemplo, cada director, beneficiario efectivo).

Paso 4: Confirmar que ha presentado a sus afiliados

Una vez que haya presentado todos los afiliados requeridos, puede proceder a responder Sí a la siguiente pregunta que pide confirmación de que se ha divulgado la información pertinente sobre los afiliados.



19.02 Question 19(b):

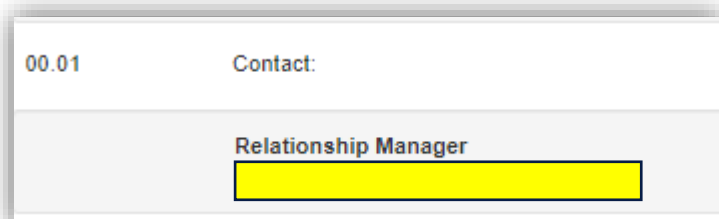
Please confirm that you have disclosed the primary contact person for the party: *

Si la sección de afiliados no se completa correctamente, o no se proporcionan todos los detalles, BAT no podrá proceder con la diligencia debida requerida. Por favor, asegúrese de completar esta sección cuidadosamente y en su totalidad para todos los afiliados requeridos.

Tenga en cuenta que si por alguna razón no se puede proporcionar alguno de los datos de los afiliados, debe seleccionar No o N/A.

Se le pedirá que proporcione una razón para ello.

Puede ponerse en contacto con su gestor de cuentas de BAT si necesita más ayuda. Puede identificarlos en la parte superior de su cuestionario.



00.01 Contact:

Relationship Manager