**SPORT4ADULTS DUE DILIGENCE POLICY**

Sport4Adults has the following Due Diligence Policy and Risk Assessment in place.

• Contact details for a client’s place of business;

• Names and addresses of any relevant people with influence over the business, such as owners and directors;

• Undertakings from the client that no other party is operating in the capacity of a shadow director under the Companies Act, if appropriate;

• The names and details of any parent or ultimate holding company which the client is a part of, if appropriate;

• Confirmation from the Phone-paid Services Authority that the provider is registered with the Phone-paid Services Authority (where registration is required);

• To make clients aware of the Phone-paid Services Authority and requiring adherence to the Phone-paid Services Authority's Code of Practice

• Companies checks;

• Reputational checks through Google, blogs, AV vendors, Level 1 providers etc.;

• How established the affiliate company is;

• Whether, according to any information that has been made available to the industry, the affiliate or any associated individual has been associated with any breach of the Code or any other related Codes of Practice or law;

• Whether the affiliate company is aware of and committed to the UK legislative and regulatory landscape, i.e. the Code and other relevant codes and legislation including the Data Protection Act, PECR, the CAP Code and relevant consumer protection laws;

• How the affiliate company sources its traffic. For example, does it source its traffic from file-sharing websites);

• If the affiliate company sub-contracts with other affiliate companies in doing so and how it sources and vets individual affiliates;

• Whether the affiliate company is willing and able to explain where and in what terms it plans to place our advertising;

• Whether the company in question has fraud detection systems and monitoring tools in place;