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1. INTRODUCTION

The Alliance of Bioversity International and the International Center for Tropical Agriculture (hereafter the “Alliance” or the “Organization”) is a worldwide not-for-profit research for development organization with a well-respected reputation. The scale of its operations, its variety of activities and projects executed, as well as its presence around the world require innovative solutions to ensure that partners and business relationships are lawful and legitimate. To preserve its reputation and prevent fraud, the Alliance needs to ensure that the individuals and entities with which it enters into a business relationship are not sanctioned and are not involved in any illegal or illicit activities.

To this end, the Alliance has subscribed to WatchDOG Elite, Computer Services, Inc. (CSI)’s Software-as-a-Service Compliance Platform, an interface that automates watch list screening with robust auditing and reporting features. This screening process is important to avoid any risk of entering into fraudulent activities with third parties.

2. PURPOSE AND OVERARCHING PRINCIPLES

The watchdog screening process is part of the risk management framework of the Alliance and follows the principles outlined in the Risk Management Policy of the Alliance, such as integrated, customized, best information available, and continual improvement. It is also based on the Fraud Prevention Policy as it implements a process to prevent any risk related to fraud, corrupt practices, or any illegal activity and thus is in line with the zero-tolerance policy of the Alliance toward any kind of fraud. This document provides guidelines for the institutional use of WatchDOG Elite by the different departments and units of the Alliance within their internal processes. WatchDOG Elite is a platform that contributes to minimizing risk in the Alliance’s operations, although additional procedures and internal controls can be implemented to safeguard institutional reputation and assets.

3. SCOPE

WatchDOG Elite is being used for screening service providers, prospective implementation partners, and consultants. The units most involved in using this tool are Procurement Services, Grants Management Unit, PLANS, Legal Office, and Human Resources Department. These guidelines should be used by all staff involved in those functions.

4. DEFINITIONS AND ACRONYMS

GMU: Grants Management Unit
HR: Human Resources Department
ODU: Organizational Development Unit
OPD: Office for Program Delivery
5. ROLES AND RESPONSIBILITIES

5.1 ODU role

- Being responsible for the institutional fraud prevention function in the Organization, the Organizational Development Unit is responsible for the administration and management of the WatchDOG Elite platform.
- ODU will create users’ accounts upon request from departments or units.
- ODU will create users’ profiles and assign roles and functions to users; it will also remove users as requested by units.

5.2 Units’ role

- The different departments and units of the Alliance are responsible for integrating the screening process using WatchDOG Elite into their different policies and processes in order to provide another level of control over service providers, implementing partners, and consultants with whom a business relationship is intended to be established, and to reinforce fraud prevention in the Alliance.
- Each department or unit wishing to use WatchDOG Elite to perform screening will request ODU to create the users’ accounts and profiles needed to perform the screening on their service providers, implementing partners, or consultants with which they wish to enter into a business relationship.
- Each department or unit wishing to use WatchDOG Elite is responsible for becoming familiar with the procedure of screening and the different features of the system. For this purpose, staff can consult a training video provided by CSI available [on this page].
- Each department or unit using WatchDOG Elite should keep a record of the screening process performed and the results.
- Each department and unit performing screening of service providers, implementing partners, or consultants and finding a transaction with a match scoring within the tolerance threshold should not enter into a business relationship with the entity being screened.
- In case of doubt when finding a transaction with a match scoring within the tolerance threshold, each department or unit using WatchDOG Elite must contact the Legal Office to understand whether any further procedure or internal controls are needed, and how to

proceed related to the service provider, implementing partner, or consultant that was subject of the screening process.

5.3 Legal Office role

- The Legal Office is responsible for advising the different departments and units of the Alliance if, while performing a screening process with WatchDOG Elite, they find a transaction with a match scoring within the tolerance threshold.
- The Legal Office will be responsible for analyzing the match scoring case submitted to it and, based on this analysis, the Legal Office will propose alternatives or decide to reject the service provider, implementing partner, or consultant.

6. USERS OF WATCHDOG ELITE

6.1 Who should use WatchDOG Elite?

Each department and unit should design its own internal controls and processes depending on its needs. The screening process provided by WatchDOG Elite should be part of the different due diligence processes of the Alliance, in addition to current controls, and not with the aim of replacing the existing ones. During the development of these guidelines, key departments and units have been identified to use WatchDOG Elite and thus implement an additional fraud prevention due diligence as part of their processes: Finance (PLANS, Treasury), OPD (GMU, PMO), Operations (Procurement), and HR (consultants’ contracting).

Any department, unit, or group of staff interested in using WatchDOG Elite can contact ODU for advice and implementation. A formal justification will be required for this purpose as well as a proper assessment of how this will be implemented within their processes.

6.2 Creation of new users’ profiles

The creation of users will be managed by ODU as administrators of the platform. For the creation of new users, a formal email should be sent to Alliance-ODU@cgiar.org by the head of the unit requesting the addition. The following information is required for proceeding with the creation of users:

- Full name of employee
- Email address of employee
- Department/unit

Once the user is created by ODU, the user should activate his/her account using the link provided in the CSI’s email with the subject “Welcome to WatchDOG Elite.” At this point, the user should proceed to change the password as requested by the system (include at least 14 characters).
6.3 How to remove users

Existing users can be removed from the platform upon request. ODU should be informed of any changes related to current users in order to keep an updated list of users.

6.4 Managing roles and functions

In WatchDOG Elite, permission to use features is controlled with functions, and these functions are grouped into roles that can then be assigned to users. Roles make it easy to apply permissions quickly and consistently.

Users with the User Maintenance function can manage roles in WatchDOG Elite. In the case of the Alliance, ODU will assign roles and functions upon request to Alliance-ODU@cgiar.org.

6.5 Training

The training to access this platform can be found at the following link: WatchDOG Elite On-Demand training. In case of additional requirements, ODU can coordinate additional On-Demand training with anticipation.

6.6 Password/reset password

The initial password should be created in accordance with the complexity settings of the system:

- 14 characters
- 1 uppercase letter
- 1 lowercase letter
- 1 number
- 1 special symbol

6.7 Help Desk/customer support

If you experience any bug or you are having any problem with the use of WatchDOG Elite, please send a formal email to alliance-odu@cgiar.org or customersupport@csiweb.com.
7. **ABOUT WATCH LIST SCREENING AND SCORING**

7.1 Lists included in the screening process

Please refer to Annex 1: Standard Watch Lists.

7.2 About Watch List Screening

Watch List Screening in WatchDOG Elite includes the ability to screen names against sanctions and watch lists, review and dispose of matches, assign transactions to workflows, add names to blocked customer lists, send notifications, and run reports.

7.3 Screening methods in WatchDOG Elite

- Single lookup – screen a single item using the WatchDOG Elite Screen a Single Item feature.
- Batch – screen a batch of items using the WatchDOG Elite Screen a Batch File feature.
- Other screening methods (web services, automated batch) are available outside of WatchDOG Elite; results of all screening methods are accessible in WatchDOG Elite.

7.4 Name Search Algorithm

The CSI Regulatory Compliance Name Search Algorithm employs a variety of name matching methodologies, including a proprietary string approximation routine designed to maximize performance while providing for a high degree of flexibility.

7.5 Search results (also called transactions)

- Transactions are generated and are displayed in WatchDOG Elite depending on several factors that are used to filter results:
- Match scoring – possible matches are scored according to how closely the screened item information matches the information on the lists that were searched.
- Tolerance threshold – transactions are generated for possible matches that meet a minimum score threshold.
- Disqualification rules – transactions are not generated for possible matches that meet the criteria specified in a disqualification rule.
7.6 Match scoring

Possible matches are delivered in a ranked list based on match scoring, which is based on how closely the screened item information matches the information on the watch list(s) it is screened against. Key factors include name matching, alias matching, country and address matching, and other identifiers. The highest possible score is 1.000, meaning that the match is perfect.

7.7 Tolerance threshold

The tolerance threshold setting indicates the minimum score required for a transaction to be generated (i.e., how closely the input name and list entity name must match in order to generate a transaction). Matches below the tolerance threshold do not generate a transaction. A higher tolerance setting indicates that the names should match more closely to generate a transaction (i.e., fewer transactions), while a lower tolerance setting generates a transaction for names that are less similar (i.e., more transactions). Tolerance thresholds can be between 0.80 and 1.00.

8. RELATED POLICIES/REFERENCES FOR MORE INFORMATION

- Fraud Prevention Policy
- Risk Management Policy
- Grants and Sub-Grants Policy
- Grants Management Manual
- Sub-Grants Management Manual
- Procurement Policy
- Hiring Consultants Guidelines

9. GUIDELINES AUTHORITY

The WatchDOG Guidelines will be managed by the Organizational Development Unit. Any modification will be approved by the ODU Unit Head. The effective date of these revised Guidelines is 10 September 2022. These guidelines supersede previous guidelines regarding this subject matter, and previous guidelines are considered rescinded.
## 10. VERSION CONTROL

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<td>Carlos Ernesto Paredes Mejía Vanessa Riveros R. Nicole R. Demers</td>
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Reviewed by: 

Approved by: 

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| Vanessa Riveros R.  
Organizational Development Unit Head | Thursday 1 September 2022  
Organizational Development Unit Head |
### ANNEX 1. STANDARD WATCH LISTS

The lists screened by WatchDOG Elite are the ones indicated with a “YES” in the third and sixth columns.

<table>
<thead>
<tr>
<th>LIST NAME</th>
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<td>HMT Ukraine Sovereignty and Territorial Integrity</td>
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