



Vendor Sanction Alert Policy

Objective:

This policy outlines the procedures and actions to be taken by the Cal State Fullerton Philanthropic Foundation (CSFPF) in the event of a sanction list alert related to a vendor or payee. The primary goal is to ensure compliance with national and international sanctions, safeguard the CSFPF reputation, and mitigate potential legal and financial risks.

1. Screening Process: The CSFPF utilized Paymentworks for a vendor screening process to regularly check and verify the status of vendors against relevant sanction lists. This screening will be conducted during the onboarding process and periodically thereafter.

2. Immediate Notification: If a sanction list alert is detected for a vendor or payee, the responsible department or individual must immediately notify the designated authority within the CSFPF.

3. Suspension of Payments: Upon receiving a sanction list alert, all payments to the vendor in question will be temporarily suspended pending a thorough investigation. The CSFPF will notify the payment requestor, University department or vendor about the suspension of payments and the reason for the investigation.

4. Internal Investigation: The designated authority will initiate an internal investigation to confirm the accuracy of the sanction list alert. This may involve collaboration with legal counsel, compliance teams, internal audit and other relevant departments to gather necessary information.

5. Compliance with Sanctions: The CSFPF will strictly adhere to national and international sanctions laws and regulations. Any actions taken will be in full compliance with these legal requirements.

6. Communication with Regulatory Authorities: In cases where a valid sanction list alert is confirmed, the CSFPF will promptly communicate with relevant regulatory authorities and comply with any reporting requirements as mandated by law.

7. Vendor Relationship Status: Based on the findings of the investigation, the CSFPF will make a decision regarding the vendor's status. This decision may include reinstating payments, terminating the vendor relationship, or implementing other appropriate measures, depending on the severity of the situation.

8. Continuous Monitoring and Screening: The CSFPF will continuously monitor and screen vendors against sanction lists to ensure ongoing compliance. Regular reviews and updates to the screening process will be conducted to address emerging threats and changes in sanction lists.

9. Legal Compliance: All actions taken by the CSFPF in response to a sanction list alert will be in compliance with applicable laws and regulations.

10. Communication: All stakeholders involved, including internal teams and the affected vendor, will be kept informed of the progress of the investigation and the subsequent decisions made by the CSFPF.

Review and Approval: This policy will be reviewed periodically, and any necessary updates will be approved by the relevant authorities within the CSFPF to ensure continued effectiveness and compliance.