



TRAC™ GUIDE

How to Apply



Act with Integrity
Operate with Excellence
Care for People

TRAC™ - How to Apply

Before applying for a new TRAC application, it is advisable to check the [TRAC Register](#) to verify if your company is already registered in the database. If you have questions or need assistance regarding your existing TRAC registration, reach out to TRAC customer support for further guidance TRAC@ethixbase360.com

Step 1: How to create your TRAC account:

If you have been sent an invitation via email, please click the link in the initial email to create an account. If you don't have the initial email, write to: TRAC@ethixbase360.com

Visit [Apply For TRAC](#) to register and follow the prompts to create your username and password.

Step 2: You will be directed to complete all sections of the TRAC application – do not use Caps Lock to complete the sections:

- **Initial ASC Documents:** TRAC candidates must provide written consent to participate in the review process.
- **Business Information:** Provide your company's legal name, address, and contact information for your authorized representative.
- **Information on Ownership and Senior Executives:** Add the company owners and identify directors and senior executives. Provide full names in this section – avoid nicknames.
- **Business Registration and Credentials:** Candidates must provide a copy of a valid, current business registration with the full legal name of the company, issued by a government agency showing that the company is active and in good standing for the current year and proof of address with an issue date of less than six months. If appropriate, a simple, unofficial English translation should also be provided. View a list of acceptable documents [here](#)
- **Compliance Information:** Complete the compliance questionnaire and provide brief explanations where necessary.
- **Ethics and Social Responsibility:** Complete a short questionnaire on anti-bribery, anti-corruption, human trafficking, felonies and criminal acts, modern slavery, conflict minerals, child labor, labor laws and bankruptcy. If appropriate, upload copies of your policies. An anti-bribery policy is required, if your company does not have an anti-bribery policy and would like to adopt one, you may use our free template "[Anti-bribery Policy Template 2023](#)".
- **Certifications:** Listed in this section are some widely used certifications of quality and diversity. Whenever possible, please upload your certification.

- **Supplemental Information and Documents:** At your discretion, individuals or entities may use this section to upload any documents, additional certifications and awards they would like to share with their TRAC connections. This section can also be used for responses to screening results.
- **Required field:** If applicable, approve or deny any pending requests from business partners.

If the request from Alcoa Corporation isn't visible at the bottom of the page prior to submission, please ensure to input the origin code "ALCOA24" when submitting your TRAC number in the payment section. Alternatively, you can contact trac@ethixbase360.com for assistance. This action will prompt us to associate your TRAC number with Alcoa Corporation.

When all sections are marked complete, the **"Submit TRAC"** link will appear at the bottom of the page. Click the link to confirm submission and proceed to the payment section and if applicable, proceed to the payment page, TRAC has an annual fee of US\$400. Once approved, your TRAC is valid for one year.

[Payment and Invoicing](#)

Screening section and continuous monitoring

Once the TRAC application is submitted to Ethixbase360 for review, the screening of the provided names will commence immediately. This step involves a thorough review of the "Screening" section by a due diligence analyst. It is essential to note that during this phase, it is advised to refrain from disputing any information until our research and review is completed.

The screening process conducted by TRAC involves continuous monitoring of all names provided in the application throughout the one-year validity period of the report. The purpose of this screening is to identify any potential risks associated with the individuals or entities listed in the application. The screening primarily focuses on the following categories:

- **Watchlists:** TRAC compares the names against various watchlists, which consist of individuals or organizations that have been flagged by regulatory bodies, law enforcement agencies, or international organizations due to their involvement in illicit activities, financial crimes, terrorism, or other unlawful practices.
- **International Sanctions:** TRAC checks if the names appear on international sanction lists. These lists are implemented by governments or supranational organizations to restrict business activities with specific countries, individuals, or entities due to political or security concerns.
- **Politically Exposed Persons (PEP):** The screening process includes determining whether any of the listed individuals are classified as politically exposed persons. PEPs are individuals who hold significant public office positions or are closely associated with such positions. The focus on PEPs is necessary due to the potential risks associated with bribery, corruption, and conflicts of interest.
- **Denied Parties Databases:** TRAC examines the names against denied parties databases, which contain information about individuals or organizations that are prohibited from conducting business due to legal or regulatory restrictions. These databases are typically maintained by governments or international bodies.
- **Global Online Media:** Global events with our screening process that extends beyond English news, providing in-depth insights from local media sources worldwide, accurately translated. This approach ensures early access to emerging risks and under-reported stories, giving you a decisive competitive edge.

During the reputational screening, the findings are compared against the information provided in the TRAC application. In cases where discrepancies or potential issues arise, a TRAC due diligence analyst will follow up with additional questions to clarify the situation. This ensures that any discrepancies are thoroughly investigated, and false positive results are ruled out.

If you need further assistance, contact the TRAC team by writing at TRAC@ethixbase360.com

APPENDIX 1: TRAC™ Required Registrations & Credentials

Documents Instructions:

For NEW applications, please combined files into pdf format from List A and B. Proof of address, use List C

For TRAC RENEWAL, please use List A. Proof of address, use List C.

All international documents must be provided with an English translation of each document plus the originals.

| List A – Article of Incorporation | List B – Certificate of Good Standing | List C - Proof of Address |
|---|--|---|
| <p>What is the purpose of Article of incorporation? Articles of incorporation are important documents because they serve as legal proof that your company is established in your state. The articles contain mandatory provisions - which provide the state government with certain basic information about the corporation.</p> <p>Most Commonly Used Documents:</p> <ul style="list-style-type: none"> • Articles of Incorporation / Organization / Formation (if stamped as filed with an authority) • Certificate of Formation / Organization (if stamped as filed with an authority) • Bylaws for your company (if stamped as filed with an authority) • Limited Liability Company Articles / Articles of Amendment • Partnership documentation • Town charter, documentation from state governments for town existence; Governor’s declarations; formal resolution from town council establishing office, if it contains the date your entity began) • License to Operate (issued by city, state) • City Business Tax Certificate <p>All international documents must have a satisfactory English language translation attached.</p> | <p>What is a certificate of good standing? A certificate of good standing—also called a certificate of existence, status certificate, or certificate of authorization—is a document issued by a government authority, usually a secretary of state, that shows your entity has met its statutory requirements and is authorized to do business.</p> <p>What does a certificate of good standing confirm? Depending on the jurisdiction, a certificate of good standing confirms (among other things) that your business:</p> <ul style="list-style-type: none"> • Is up to date on jurisdiction fee payments • Has filed an annual report • Has paid franchise taxes <p>Most Commonly Used Documents:</p> <ul style="list-style-type: none"> • PDF file of your business profile in your country’s official online business registry (must be current registration and must include the registry URL). <i>Do not submit Screenshot</i> • Certificates of Good Standing* issued by your state to your business that contains date of incorporation, organization, or establishment <p>All international documents must have a satisfactory English language translation attached.</p> | <p>What is proof of address? The term proof of address is self-explanatory: refers to a document that verifies where your company is physically located.</p> <p>Most Used Documents:</p> <ul style="list-style-type: none"> • Bank Statements (please redact sensitive information) • credit card statement • Bank reference letter • Mortgage statement or contract • Letter issued by a public authority (e.g. a courthouse) • Department of Treasury IRS letter assigning your EIN • Secretary of State Certificate of Filing • Utility Bills (water, gas, or electric) • Phone bill (please redact sensitive information) • Recent City Business Tax Certificate • Tax Exemption Status Letter • Tax invoices (federal, state, local, international) • “Doing-business-as” or DBA documents (if stamped as filed with an authority) • Annual company tax returns • Authorized change of address form • Official letter from an educational institution • Municipality bill or government tax letter • License to Operate (issued by city, state, government) <p>All international must have a satisfactory English language translation attached.</p> |

Payment and Invoicing

All transactions for TRAC shall be made through the TPMS. Once all sections of the application are marked complete, the “Submit” link will appear at the bottom of the page. Click submit to be directed to the payment information section.

Our system accepts all major credit cards. If you prefer using wire transfer, you can request an invoice through TPMS. TRAC offers three different payment methods: Credit Card, Alipay and Bank Transfer (Invoice Me).

Credit Card: Preferred payment method is Credit Card, Ethixbase360 accepts America Express, Visa and MasterCard credit card types, please make sure the card can be used for international purchases. Your credit card details are not stored in the TPMS. Your information is transferred to STRIPE, an internet payment processing company. By proceeding, you acknowledge STRIPE’s privacy policy and use of cookies as described in www.stripe.com/privacy

Invoice me: Submit the TRAC to generate an order number, the payment and bank information is sent by our accounting department within 24 – 48 hours. The fee to pay by Bank Transfer is USD\$400.00 plus a convenience fee of USD\$20.00 and the payor is responsible for all bank, transfer, withholding, and other fees incurred to facilitate payment to the US in USD, any short payments will further delay the completion of your TRAC application review and approval. Ethixbase360 must receive a complete payment of USD\$420.00 to be able to review your application.

Alipay: Alipay is a third-party mobile and online payment platform, any inquiries related to this form of payment must be directed to Alipay customer service.

Bank information

Please allow 24 – 48 hours to receive an invoice with details on how to remit payment to Ethixbase360’s bank. The email will be sent from our billing software, if you do not see the email in your inbox within 48 hours, please be sure to check your spam folder or contact trac@ethixbase360.com

After the payment is submitted my payment, our invoicing team will confirm once your payment reaches our bank.

Instructions for using the Anti-Bribery Policy Template:

1. Select the template with your preferred language:
 - Choose the template that is written in your preferred language from the available options.
2. Copy and paste the template into your browser:
 - Highlight the entire content of the chosen template.
 - Right-click on the selected text and choose the "Copy" option.
 - Open your preferred web browser.
 - Create a new document or open a text editor or word processing software.
 - Right-click in the document or editor and choose the "Paste" option.
 - The template content should now be copied into your browser or document.
3. Remove the Red-Marked Paragraph:
 - Look for a paragraph within the template that is marked in red.
 - Delete or remove the entire, red-marked paragraph from the template.
 - Ensure that no red-marked text remains in the final version.
4. Replace the highlighted "Company Name" with your Company Name:
 - Scan through the template and locate instances where the "Company Name" is highlighted.
 - Select the highlighted "Company Name" by double-clicking on it or using the cursor to highlight it.
 - Replace the highlighted "Company Name" with your actual company name.
 - Repeat this step for all highlighted occurrences of "Company Name" in the template.
5. Save and Share the Finalized Document:
 - Once you have made all the desired changes and customizations, save the document in your preferred file format (e.g., PDF, Word document) for future reference.
 - If required, print the document on your company letterhead for official use.
 - Share the finalized document with authorized individuals within your company, such as owners, directors, or senior executives, for review and approval.
6. How to upload the policy in your TRAC:
 - Go to tpms.ethixbase360.com and log in with your username and password.
 - On the "My Dashboard" page, you will find your TRAC profile information, click on the "Action" tab and click the "View Profile" link.
 - Ethics and Social Responsibility Section: On question 1, please change your answer to yes and upload the anti-bribery policy - don't forget to disclose if the policy is distributed to employees and to sign the document.

Remember to consult with legal professionals or compliance experts to ensure that the finalized policy aligns with the specific legal requirements and regulations applicable to your business. This anti-bribery policy template is intended to help organizations in creating their own policy on anti-bribery and corruption. It can be modified and broadened as needed (Please note that this document is for informational purposes only and does not constitute legal advice)

English: Anti-Bribery Policy Template

This is an Anti-bribery policy template only. Business letterhead and signature by an authorized signatory, senior executive, or owner are required when uploading the policy on TRAC.

This anti-bribery policy template is intended to help organizations in creating their own policy on anti-bribery and corruption. It can be modified and broadened as needed (Please note that this document is for informational purposes only and does not constitute legal advice)

Copy and Paste:

Company Name Anti-Bribery Policy

Company Name hereby adopts the following Anti-Bribery Policy with respect to all commercial transactions, whether local or international:

LOCAL AND FOREIGN LAWS: Neither Company Name, nor anyone acting on behalf of Company Name, may, directly or indirectly, break or seek to evade the laws or regulations of any country in, through, or with which Company Name seeks to do business. That an illegal act is a “customary business practice” in any country is not sufficient justification for violation of this provision.

BRIBERY AND FACILITATING PAYMENTS: Neither Company Name, nor anyone acting on behalf of Company Name, may, directly or indirectly, offer or provide a bribe, and all demands for bribes must be expressly rejected.

Bribery includes any offer, promise, or gift of any pecuniary or other advantage, whether directly or through intermediaries, to a public official, political party, political candidate or party official or any private sector employee, in order that the official or employee act or refrain from acting in relation to the performance of their duties, in order to obtain or retain business or other business advantage.

Neither Company Name, nor anyone acting on behalf of Company Name, shall offer or make facilitating payments to government officials in order to encourage them to expedite a routine governmental task that they are otherwise required to undertake. Company Name, or anyone acting on behalf of Company Name, shall have discretion to deviate from this prohibition if he/she believes that there is an immediate threat to his/her or another’s health or safety. The circumstances of such payment must be reported as soon as possible after the event and the payment properly recorded. Company Name recognizes that extortion is widespread and that participation by the business community increases demand for facilitating payments.

KICK-BACKS: Neither Company Name, nor anyone acting on behalf of Company Name, may offer or accept a “kick-back” of any portion of a contract payment to employees of other parties to a contract or use other vehicles such as subcontracts, purchase orders or consulting agreements to channel payments to government officials, political candidates, employees of other parties to a contract, their relatives or business associates.

A “kickback” is a particular form of bribe which takes place when a person entrusted by an employer or public function has some responsibility for the granting of a benefit and does so in a way that secures a return (kickback) of some of the value of that transaction or benefit for that person without the knowledge or authorization of the employer or public body to which the person is accountable.

CONFLICTS OF INTEREST: Company Name, and anyone acting on behalf of Company Name, shall avoid any relationship or activity that might impair, or appear to impair, the ability to render objective and appropriate business decisions in the performance of our jobs.

POLITICAL CONTRIBUTIONS: Neither **Company Name**, nor anyone acting on behalf of **Company Name**, may make a political contribution in order to obtain an unlawful business advantage. **Company Name** shall comply with all public disclosure requirements.

PHILANTHROPIC CONTRIBUTIONS: **Company Name**, and anyone acting on behalf of **Company Name**, may make contributions only for bona fide charitable purposes and only where permitted by the laws of the country in which the contribution is made. Contributions made in order to obtain an unlawful business advantage are prohibited.

EXTORTION: **Company Name**, and anyone acting on behalf of **Company Name**, shall reject any direct or indirect request by a public official, political party, party official, or private sector employee for undue pecuniary or other advantage, to act or refrain from acting in relation to his or her duties.

GIFTS, HOSPITALITY AND ENTERTAINMENT: **Company Name**, and anyone acting on behalf of **Company Name**, shall avoid the offer or receipt of gifts, meals, entertainment, hospitality or payment of expenses whenever these could materially affect the outcome of business transactions, are not reasonable and bona fide expenditures, or are in violation of the laws of the country of the recipient.

REPORTING REQUIREMENT: All officers and employees of **Company Name** and anyone acting on behalf of **Company Name** shall promptly report any actual or potential violation of this Anti-Bribery policy, including any instance in which he/she is subjected to any form of extortion or is asked to participate in any way in a bribery scheme, to **Company Name** senior corporate management, without fear that his/her business relationship or employment will be adversely affected. Reports shall be treated confidentially to the extent possible, consistent with the need to conduct a thorough investigation.

COMPANY RESPONSE: No employee will suffer demotion, penalty or other adverse consequences for not paying bribes even when **Company Name** may lose business as a result of the employee's refusal to do so. Employees are required to report alleged violations of this Anti-Bribery policy to senior management and no employee will suffer demotion, penalty or adverse consequences for reporting.

Company Name shall, where appropriate, sanction employees, suppliers or other business partners for violations of this Anti-Bribery policy.

ACCOUNTS: **Company Name** shall maintain complete and accurate financial records, ensuring that all transactions are properly, accurately and fairly recorded in a single set of books.

The person whose signature appears below is duly authorized to adopt this Anti-Bribery Policy on behalf of **Company Name** and, if signing on behalf of a company, agrees that this policy shall apply to all officers, employees and representatives of **Company Name**.

I hereby adopt and agree to comply with the Anti-Bribery Policy as outlined above.

Printed/Typed Name

Title

Signature

Date



About Ethixbase360:

Ethixbase360 helps organizations achieve value chain transparency through its market-leading third-party risk management platform and risk-based due diligence solutions. With a dedicated focus on anti-corruption, modern slavery, human rights and ESG, Ethixbase360's solutions are aligned with the 10 principles of the United Nations Global Compact and provide actionable insights into third party risk and resilience factors. The Ethixbase360 platform and embedded risk-based due diligence solutions offer organizations a sustainable and scalable approach to managing third party risks across the entire value chain.

In 2022, Ethixbase360 acquired Tcompliance expanding its due diligence offerings to include Tcertification, the gold standard in third party due diligence, and other collaborative due diligence solutions. Combined, the two companies have conducted over 1 million due diligence reviews in every non-sanctioned country and monitor more than 2 million third parties daily. Learn more at www.ethixbase360.com.