



Enabling global identity  
Protecting digital trust

# Accreditation Documentation Checklist



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### Checklist Instructions

Sections A, B, and C (Questions 1-3) must be completed and submitted as part of the Accreditation Plan. Sections D through L and the remaining questions from Section C are to be completed and submitted after the Accreditation Plan has been agreed with GLEIF and the Master Agreement has been fully executed.

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### Please note:

**This version of the Accreditation Checklist should be used by all Applicants and Candidates after 31 May 2021 for Accreditation and Annual Accreditation Verification when instructed.**

**Any prior versions of the Accreditation Checklist will no longer be utilized nor accepted by GLEIF. This document is posted to the GLEIF website for public use and downloading.**

**All questions as applicable consider and address both Level 1 and Level 2 data requirements. The Applicants/Candidates need to ensure this factor is incorporated into all responses.**

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Please provide Information related to Parent/Owner and/or LEI Operations as noted

> Required Documentation to be Submitted with Accreditation Plan

## A Contact Details

**Legal Name of Applicant LOU | Note:**

This name must match your LEI reference Data

VAT No. if applicable

URL of Applicant LOU

Submission Date (YYYY-MM-DD)

Parent/Grandparent/Owner/Governing Organization if applicable

Accreditation Plan

Checklist

LEI of Parent/Grandparent/Governing Organization if applicable

First Submission

Revised Submission

### Internal Project Manager

Name

Title

Email

Phone

### Authorized Representative

Name

Title

Email

Phone

### Key Contact Operations

Name

Title

Email

Phone

### Key Contact Finance

Name

Title

Email

Phone

Please ensure you have:

Yes

No

In Progress

- Provided your LEI below
- Provided a Notarized Copy of the Authorized Representative's Signature

In submitting this document, I confirm that, to the best of my knowledge, my organization is in compliance with or is able to become compliant with the requirements of GLEIF reflected in the Master Agreement and its appendices, Accreditation Manual and Checklist and Service Level Agreement as of the date of this document unless otherwise noted.

Authorizing Representative Signature\*

Date (YYYY-MM-DD)

### E-Signature

Name

Title

Email

Phone

LEI (20 Alphanumeric Characters)

\* Please note: the Authorized Representative may sign this form physically or electronically

Please provide Information related to Parent/Owner and/or LEI Operations as noted

> Required Documentation to be Submitted with Accreditation Plan

## B Entity Structure

Legal Name of Applicant LOU

### Organization Structure

Parent/Governing Organization

Applicant LOU

Government

Government

Private – For Profit

Private – For Profit

Private – NonProfit

Private – NonProfit

Public-Listed

Public-Listed

Public-Non-Listed

Public-Non-Listed

Not Applicable – there is no parent/owner

Other

Other

Accounting Framework Check as many as applicable

Internal Controls Framework Check as many as applicable

US GAAP

COSO

IFRS

COBIT

Transitioning to IFRS

ISO\*

Other – Please specify\*

Other – Please specify\*\*

Unknown/Not Applicable

Unknown/Not Applicable

\*Comments (if any)

\* Please note the applicable standard and provide the certificate if you have been certified

\*Comments (if any)

FISCAL YEAR (Please provide your business calendar)

Payment Currency Please choose one

USD

EUR

CHF

Date (YYYY-MM-DD)

Date (YYYY-MM-DD)

Please provide Information related to Parent/Owner and/or LEI Operations as noted

> Required Documentation to be Submitted with Accreditation Plan

B Entity Structure

Legal Name of Applicant LOU

Jurisdiction – Self-Registration

Please complete the Registry Inventory Spreadsheet Form and include it in your Accreditation Plan submission. The form is on our website.

Statement of Beneficial Ownership

Please list all Entities which have > 20 % ownership stake in your organization			
	Entity	LEI#	%

Potential Taxation Requirements

Please detail your taxation strategy as it relates to your operations and LOU services

Please provide Information related to Parent/Owner and/or LEI Operations as noted

> Required Documentation to be Submitted with Accreditation Plan

## B Entity Structure

### Legal Name of Applicant LOU

External Audit Firm (if applicable)

Comments (if any)

#### First Name

Yes

No

Not Applicable

Are annual financial statements issued?

Parent Level

LOU Level

Is an annual management letter/report issued which relate to LEI services?

Are your financial statements public record?

Parent Level?

LOU Level?

Governmental/Regulatory Auditors (if applicable)

Comments (if any)

#### Organization

Yes

No

Not Applicable

Are annual financial statements issued?

Parent Level

LOU Level

Are periodic management letters/reports issued which could relate to LEI services?

Parent Level

LOU Level

Are these reports public record?

Please provide Information related to Parent/Owner and/or LEI Operations as noted

> Required Documentation to be Submitted with Accreditation Plan

## B Entity Structure

**Internal Audit Group** (if applicable)

Comments (if any)

**Department**

Yes

No

Not Applicable

Are financial/operational/IT scope audits performed?

Parent Level

LOU Level

Are periodic management letters/reports issued which could relate to LEI services?

Are these reports public record?

**External Consultants** (if applicable)

Comments (if any)

Yes

No

Not Applicable

Have you engaged a third party to evaluate your business and/or IT operations/controls?

Parent

LOU

Both

Are any of these reports SSAE16 SOC Type 1 or equivalent?

Parent

LOU

Both

Are any of these reports SSAE16 SOC Type 2 or equivalent?

Parent

LOU

Both

Are any of these reports ISAE3402 or equivalent?

Parent

LOU

Both

Are any of these reports public record?

Parent

LOU

Both

Please specify the provider of service(s):

Comments (if any)

### Please note:

For any third party reports submitted for Accreditation consideration, please indicate which specific LEI operations and questionnaire sections/ items it addresses. In these cases, the LOU does not need to provide additional supporting documentation unless requested by GLEIF.

Please provide Information related to Parent/Owner and/or LEI Operations as noted

> Required Documentation to be Submitted with Accreditation Plan

## C Organization Structure

### Legal Name of Applicant LOU

Organization Structure	Govern- ment	Private – For Profit	Private– Non Profit	Public- Listed	Public Non-Listed				
Type of Document	Applicability					Applicant LOU Response			
						Included	Not included	Not included cannot be provided due to con- fidentiality	Not applicable
1. Prior Year Financial Statements (Parent/Owner)	N	Y	Y	Y	Y				
2. Auditor/Regulator Letter(s)/Report(s) (Parent/Owner & LEI Ops)	Y	N	N	Y	Y				
3. Most Recent Annual Report	N	Y	Y	Y	Y				
4. Current Organization Chart for all LEI Operations and complete list of all relevant third party service providers.	Y	Y	Y	Y	Y				
5. Relevant Operational Procedures (LEI Ops only)	Y	Y	Y	Y	Y				
6. Relevant Technical Procedures (LEI Ops only)	Y	Y	Y	Y	Y				
7. Relevant Compliance Procedures (LEI Ops only)	Y	Y	Y	Y	Y				
8. Records Retention Policy (Parent/Owner & LEI Ops)	Y	Y	Y	Y	Y				
9. Relevant third party and Vendor Agreements (LEI Ops only)	Y	Y	Y	Y	Y				

### Comments

#### Please note:

Documents 1–3 should be provided as part of the Accreditation Plan submission. The remaining examples will support your responses in other sections of the Checklist and you should gather current versions as applicable and provide to GLEIF after the signing of the Master Agreement.

Please provide Information related to Parent/Owner and/or LEI Operations as noted



## D Financial Data, Audits &amp; General Governance

## Legal Name of Candidate LOU

## Financial Data, Audits &amp; General Governance

Type of Document	Xref to Docs Provided	Yes	No	N/A	Additional Documentation Requested
	Please cite document and page #		Please check one		
<b>1. General Questions – Going Concern – Parent and LOU</b>					
1.1 Has an independent audit of your financial statements been performed for your last completed fiscal year?					Audited financial statements (income statement, balance sheet, cash flows statement) for prior year  If your organization does not have audited statements, please provide your prior and current financials as maintained. Please explain how these statements are validated and reported.
1.2 Has your audit firm/government regulatory agencies issued any management letters relating to LEI operations over the past three years? – This would include commentary relating to internal controls, accounting controls and methods of procedures.					Final Management Letters with management responses as applicable.
1.3 Do you have an internal audit function?					
1.3.1 Have they performed any audits within your organization relating to LEI operations?					Relevant issued internal audit reports which relate to LEI operations in the past 2 years  Please include management responses.
1.4 Have you been subject to any regulatory audits/reviews in your current year's operations?					Relevant comment letters, audit reports (qualified and unqualified opinions) and management responses as applicable
1.5 Do you have a formal LEI Operations Budget for this year and next year's operations?					Please provide budgets as per GLEIF instructions and explain financial assumptions, volume estimations, operating budget, expenses etc. – soft copies should be submitted wherever possible.
<b>2. General Questions – Going Concern – Parent and LOU</b>					
2.1 Are third party services (e. g. augmented staff, cloud services, data centers) utilized in order to provide LEI services?					Summary of vendor contracts and detailed description of services provided; copies of contracts may be requested
2.2 Do you have intellectual property and/or proprietary methods/ systems which are employed in the delivery of LEI services?					Provide a description of the asset and its use with respect to LEI services
2.3 Are you currently involved with any litigation matters which could effect LEI services?					Provide a summary of all relevant litigation, arbitration, claims and proceedings
2.4 Are you subject to regulatory compliance requirements which could effect LEI operations?					Please list all relevant governmental regulatory agencies and the applicable regulations with respect of LEI activities

Please provide Information related to Parent/Owner and/or LEI Operations as noted

## E Cost Recovery Requirements

### Legal Name of Candidate LOU

#### Cost Recovery Requirements

Type of Document	Xref to Docs Provided	Yes	No	N/A	Additional Documentation Requested
	Please cite document and page #	Please check one			
1. Do you clearly understand the technical requirements of the Cost Recovery Principle?					Please summarize any actual or contemplated changes to the GLEIF-approved Plan since the date of Master Agreement signing.
2. Do you confirm that the LOU business operations will comply with the Cost Recovery Principle at and after accreditation?					Please summarize any actual or contemplated changes to the GLEIF-approved Plan since the date of Master Agreement signing.
3. Do you confirm that the LOU business operations will comply with the Cost Recovery Principle at and after					Please summarize any actual or contemplated changes to the GLEIF-approved Plan since the date of Master Agreement signing.
4. Do you clearly understand the requirements of the annual verification process and the independent cost recovery audit?					Please summarize any actual or contemplated changes to the GLEIF-approved Plan since the date of Master Agreement signing.
5. Please confirm that your budget information as submitted conforms to the following definitions: Direct Cost: Specifically allocable to a particular business that can be accurately and clearly traced, with little effort, to said business activity, including intercompany transfer fees based on "arm's lengths" terms and fees paid to third party service providers assisting the performance of Services agreed in the Service Level Agreement (Appendix 06). Only the services mentioned in the above definition should be considered to be the cost objects for the purpose of calculating direct costs.					
<b>Types of Direct Cost:</b>					
<b>Dedicated LOU Personnel costs:</b> e.g. salary overtime, recruitment costs, Travel, Training					
<b>Dedicated LOU Resources:</b> e.g. IT hardware/software/ supplies, telephone/internet, stationary & postage.					
<b>Dedicated LOU Support:</b> e.g. Marketing, monitoring, legal, audit costs, GLEIF fees.					

A Candidate LOU must submit three-years operating budget information in Excel format for Cost Recovery review by GLEIF. A specific definition of each cost category and its relevance to LEI operations must be included.

Please provide detailed (line by line) disclosure of DIRECT COSTS (defined above) that can be specifically allocated to the Services outlined in Section F of this document.

It needs to be clearly demonstrated that these costs are direct costs as defined.

#### Please note the following:

- ❗ **Do not** include any indirect/overhead costs as part of LEI direct costs. This includes costs such as general administrative functions and management time. The overarching 100 % uplift factor is applied to compensation for these costs.
- ❗ For costs relating to intercompany transfer fees and fees paid to third party service providers, please provide detailed cost information by service and provider separately from the Direct Cost data. **Do not** include these costs in the LEI direct costs data.
- ❗ All data provided is subject to inquiry and/or audit at GLEIF's discretion.

Please provide Information related to Parent/Owner and/or LEI Operations as noted

> Required Documentation to be Submitted with Checklist Responses

## F LOU Services

### Legal Name of Candidate LOU

#### LOU Services

Type of Document	Xref to Docs Provided	Yes	No	N/A	Additional Documentation Requested
	Please cite document and page #	Please check one			
1. Issue new LEIs					
1.1 Will you execute a formal contract either physically or electronically with a Legal Entity for every LEI issued?					Please provide a template and a brief narrative including all points
1.2 Does your legal entity contract template include all requirements as defined in the Master Agreement Appendix 5?					
1.3 Do you have a standard process for receiving payment from a legal entity for which an LEI was provided?					Please provide a brief narrative
1.4 Upon receipt of an application do you have procedures in place for:					Please provide a brief narrative on all points
1.4.1 Verifying against an authoritative source the accuracy of the LE-RD provided by the LE?					
1.4.2 Verifying existence and eligibility of the entity applying for the LEI?					
1.4.3 Verifying that the individual signing the application is duly empowered?					
1.4.4 Ensuring an up-to-date list of applicable accounting standards and authoritative sources is used for verifying that the reported relationship information exists?					
1.4.5 Verifying the existence and eligibility of the relationship information reported?					
1.4.6 Informing the Legal Entity that either its application shall require amendment, shall be refused, or the LEI has been issued and incorporated into the Global LEI repository?					
1.4.7 Reporting the correct relationship information of the Legal Entity?					
1.4.8 Uploading new LEI and LE-RD as well as relationship records to GLEIF?					
1.4.9 Accepting without delay and processing applications for an LEI?					

Please provide Information related to Parent/Owner and/or LEI Operations as noted

## F LOU Services

### Legal Name of Candidate LOU

#### LOU Services

Type of Document	Xref to Docs Provided	Yes	No	N/A	Additional Documentation Requested
	Please cite document and page #		Please check one		
<b>2. Enter Legal Entity Events</b>					
2.1 Do you have a formal process in place which includes:					Please provide a template and a brief narrative including all points
2.1.1 Providing an interface or mechanism for the Legal Entity to update LE-RD					
2.1.2 Maintaining procedures for verifying the change is duly empowered to do so by:					
- Reverifying the authority of the requestor of the change?					
- Reconfirming the authorized person's contact details including email address?					
- Reconfirming the requestor email address is not generic?					
2.1.3 Checking, if an update to the relationship information is also required?					
2.1.4 Verifying via an authoritative source the accuracy of the Legal Entity Event change?					
2.1.5 Informing the Legal Entity of changed LE-RD and uploading the changed LE-RD to GLEIF?					
<b>3. Manage Challenges</b>					
3.1 Do you have a formal challenge process in place which includes:					Please provide a template and a brief narrative including all points
3.1.1 Reviewing and responding to LEI and LE-RD challenges transmitted to the LOU by GLEIF?					
3.1.2 Ensuring that the relationship information is also reviewed and changed, where applicable?					
3.1.3 Informing the Legal Entity of validated challenges and uploading the changed LE-RD to GLEIF as applicable?					
<b>4. Transfer of LEIs and LE-RD</b>					
4.1 Do you have a process in place for a Legal Entity to request transfer of a LEI?					Please provide a template and a brief narrative including all points
4.2 Does your process ensure that:					
4.2.1 The defined and established transfer rules in the GLEIS are followed?					
4.2.2 Procedures for verifying the individual requesting the LEI transfer is duly empowered to do so are in place?					
4.2.3 The associated relationship information is transferred as well?					
4.2.4 LE-RD is verified via an authoritative source?					
4.2.5 Relationship information is correctly transferred as well?					
4.2.6 The Legal Entity is informed (as applicable)?					
4.2.7 The LEI and its changed LE-RD are uploaded to GLEIF?					

Please provide Information related to Parent/Owner and/or LEI Operations as noted

> Required Documentation to be Submitted with Checklist Responses

## F LOU Services

### Legal Name of Candidate LOU

#### LOU Services

Type of Document	Xref to Docs Provided	Yes	No	N/A	Additional Documentation Requested
	Please cite document and page #	Please check one			
<b>5. Renewals of LEIs</b>					
5.1 Are there procedures in place for:					Please provide a template and a brief narrative including all points
5.1.1 Notifying Legal Entity of upcoming renewal requirements?					
5.1.2 Providing an interface or mechanism for the Legal Entity to renew?					
5.1.3 Maintaining procedures for verifying the individual requesting the LEI renewal is duly empowered to do so?					
5.1.4 Uploading the relationship information as well?					
5.1.5 Verifying via an authoritative source the accuracy of the LE-RD?					
5.1.6 Informing the Legal Entity about any missing or incorrect entries?					
5.1.7 Receiving secure payments for the renewal?					
5.1.8 Adjusting the LEI and relationship status as applicable to recognize renewal or non-renewal?					
5.1.9 Informing the Legal Entity of renewal or non-renewal status?					
5.1.10 Uploading the changed LE-RD and the updated relationship information to GLEIF?					
5.2 If you are planning to use multiple-year renewal contracts, can you please confirm that there are procedures in place for ensuring that the following will be performed on annual basis within the contract period:					Please provide a brief narrative including all points
5.2.1 Informing the Legal Entity about any missing or incorrect entries?					
5.2.2 Adjusting the LEI and relationship status as applicable to recognize renewal or non-renewal					
5.2.3 Informing the Legal Entity of renewal or non-renewal status?					
5.2.4 Uploading the changed LE-RD and the updated relationship information to GLEIF?					
<b>6. Check for Duplicates</b>					
6.1 Are there procedures in place for checking against GLEIF's Check for Duplicates facility and process as defined? Please explain.					
6.2 Are there procedures in place to avoid any types of duplicates in the system? Please explain.					

Please provide Information related to Parent/Owner and/or LEI Operations as noted

> Required Documentation to be Submitted with Checklist Responses

## F LOU Services

### Legal Name of Candidate LOU

#### LOU Services

Type of Document	Xref to Docs Provided	Yes	No	N/A	Additional Documentation Requested
	Please cite document and page #		Please check one		
<b>7. Code Lists</b>					
7.1 Are there procedures in place to ensure the implementation of the code lists updates within the defined timeframe? Please explain.					
<b>8. Code Lists</b>					
8.1 Are there procedures in place for checking against GLEIF's Data Governance Pre-Check API as defined? Please explain.					
8.2 Are there procedures in place to avoid any data quality failures in the system? Please explain.					
<b>9. Metric Data Collection</b>					
9.1 Do you regularly check your SLA performance in the SLA dashboard to ensure the timely remediation of any detected failure to prevent a service level breach and in case of a service level breach to immediately remediate it?					
<b>10. Third Party Resources /Registration Agents</b>					
10.1 Do you currently utilize third party services such as registration agents?					
10.1.1 Does your organization have a formal vetting process for evaluating the reliability of a third party service provider or registration agents? If so, does it consider:					Please provide a description of how you develop, issue, monitor and update procedures carried out by the third party service provider
10.2 Do you have a formal vetting process for evaluating the reliability of a third party service provider or registration agents? If so, does it consider:					Please provide a brief narrative including all points
10.2.1 Financial stability					
10.2.2 Market reputation					
10.2.3 Abilities to meet LOU and GLEIF control requirements?					
10.2.4 Evaluating the potential risks of utilizing the services provided					

Please provide Information related to Parent/Owner and/or LEI Operations as noted

> Required Documentation to be Submitted with Checklist Responses

G Required Website Items

Legal Name of Candidate LOU

Required Website Items					
Type of Document	Xref to Docs Provided	Yes	No	N/A	Additional Documentation Requested
	Please cite document and page #	Please check one			
1. After Accreditation, will your website:					These items will be reviewed and documented during the live walk through of the LEI system.
1.1 Provide a transparent means for Legal Entities to submit and update registration information?					
1.2 Provide a transparent means for Legal Entities to understand the process of requesting an LEI or LEI transfer?					
1.3 Incorporate all terms and requirements of GLEIF's Terms of Use as defined in Appendix 9b of the Master Agreement?					
1.4 Display your accreditation certificate on your LOU homepage?					
1.5 Display the GLEIF logo?					

Please provide Information related to Parent/Owner and/or LEI Operations as noted

## H Records Management

### Legal Name of Candidate LOU

#### Records Management

Type of Document	Xref to Docs Provided	Yes	No	N/A	Additional Documentation Requested
	Please cite document and page #		Please check one		
1. Do you maintain a complete audit trail in compliance with ISO 17442 data attributions and other Common Data File format elements (Level 1 business card data and Level 2 relationship data) for all actions affecting the content or status of LEI records?					Please provide a brief narrative and copies of all relevant policies
2. Is a particular function responsible for all aspects of record retention as per your established internal policies? What is your testing process and periodicity?					Please provide a brief narrative and copies of all relevant policies
3. Do you process paper records? If yes, are there specific retention policies regarding this?					Please provide a brief narrative and copies of all relevant policies
4. Is periodic training provided to all relevant personnel (including employees, contractors and temporary staff) to make them aware of your Records Management procedures?					Please provide a brief narrative and copies of all relevant policies
5. Do you create and maintain an internal list/index of relevant records and/or storage archives which includes information relating to Retention Periods and is it periodically updated?					Please provide a brief narrative and copies of all relevant policies
6. Do you ensure indexing, scanning, retrieval, storage and destruction processes are documented, communicated, and tested at least annually?					Please provide a brief narrative and copies of all relevant policies
7. Do your historical records include:					
7.1 All LEI data elements (Level 1 business card data and Level 2 relationship data) for the current LEI and all of its associated changes?					Please provide a brief narrative and copies of all relevant policies
7.1.1 If yes, do the records include: <ul style="list-style-type: none"> <li>– Effective date of any change(s)</li> <li>– The entity responsible for the change(s)</li> <li>– The reason for each change(s)</li> <li>– Who performed the change(s)</li> <li>– Who authorized the change(s)</li> </ul>					Please provide a brief narrative and copies of all relevant policies
7.2 Identification of Data Sources for each issuance/change?					Please provide a brief narrative and copies of all relevant policies
8. Do you ensure access to relevant records is restricted to only those employees who are appropriately authorized and need access to perform their duties?					Please provide a brief narrative and copies of all relevant policies
9. Do you ensure control procedures relating to the physical and environmental protection of relevant records, including archived data is in place and functioning properly?					Please provide a brief narrative and copies of all relevant policies
10. Do you ensure relevant records are only destroyed in compliance with your procedures and any local or legal requirements?					Please provide a brief narrative and copies of all relevant policies

Please provide Information related to Parent/Owner and/or LEI Operations as noted



> Required Documentation to be Submitted with Checklist Responses

## I Software Development | J Networks & Infrastructure

Legal Name of Candidate LOU

### Software Development

Type of Document	Xref to Docs Provided	Yes	No	N/A	Additional Documentation Requested
	Please cite document and page #	Please check one			
1. Do you have a document which describes the software development tools and environment in place for the LEI operation?					Relevant process documents
2. Do you have a formal process for developing and approving new software?					Relevant process documents
3. Do you have any outsourced software development arrangements relating LEI operations?					Relevant process documents
4. Do you have a process in place for identifying, tracking and correcting software errors / bugs?					Relevant process documents
5. Do you have standard IT service management processes in place? Please provide evidence that these are followed and maintained as needed. This would include a patching process and upgrade/ update policies and procedures.					Relevant process documents

### Networks & Infrastructure

Type of Document	Xref to Docs Provided	Yes	No	N/A	Additional Documentation Requested
	Please cite document and page #	Please check one			
1. Please provide a network diagram showing network entry points, firewalls, servers etc..					Relevant process documents and technical diagrams
2. Please describe the current server/hosting environment? Is it hosted, in-house, via a third party, etc.? Describe the use of any cloud-based resources such as Amazon Web Services or Microsoft Azure.					Relevant process documents and technical diagrams
3. Do you perform any monitoring over the LEI-related IT infrastructure?					Relevant process documents and technical diagrams
4. Are there any redundancies built into the hosting platform and hardware?					Relevant process documents and technical diagrams
5. Has there been any unscheduled network or system downtime in the past twelve months?					Relevant process documents and technical diagrams
6. Do you have a current disaster recovery and/or business continuity plan in place? How often is it tested? Has the plan been invoked during the past 3 operating years?					Relevant process documents, results of last testing cycle and summary of any incidents
7. Do you have structured backup policies and practices?					Relevant process documents

Please provide Information related to Parent/Owner and/or LEI Operations as noted

> Required Documentation to be Submitted with Checklist Responses

## K IT Security & Compliance

Legal Name of Candidate LOU

### Security & Compliance

Type of Document	Xref to Docs Provided	Yes	No	N/A	Additional Documentation Requested
	Please cite document and page #	Please check one			
1. Have you performed or engaged a third party to test system vulnerability, intrusion detection or perform penetration testing? Please list all vendors as applicable.					Relevant process documents and most current reports
2. Do you maintain firewall(s)?					Relevant process documents and technical diagrams; please describe its purpose and your monitoring procedures.
3. Is access to source code and other critical resources (documents, contracts etc.) monitored and tracked?					Relevant process documents and technical diagrams
4. Are there any users that are not subject to the standard security policies of the Company/Business Unit/Department?					Relevant process documents and list of exceptions
5. Are there non-employees who have access to critical company information (source code, documentation etc.)?					Relevant process documents and list of exceptions
6. Are terminated employees/contractors removed from access to LOU systems/resources in a timely manner?					Relevant process documents and technical diagrams
7. Do you have password policies for the networks and systems, including length and complexity, and any expiration policies?					Relevant process documents, technical diagrams and most current reports
8. Do you have procedures in place to identify, report and remediate any security breaches?					Relevant process documents, technical diagrams and most current reports
9. Do you have any physical access restrictions to critical company assets such as servers and data?					Relevant process documents, technical diagrams and most current reports
10. Have you had any IT operational or security audits (i. e. SSAE 16, SAS70) performed in the past three years?					Relevant process documents and results of last testing cycle
11. Have you had any LEI-related security breaches in the past five years?					Relevant process documents, technical diagrams and most current reports
12. Do you have your compliance activities in place to ensure compliance with respect to all applicable Data Privacy Laws?					Relevant process documents. Please specify which data privacy laws you are enforcing and confirm that you are meeting the requirements documented in Appendix 11 of the Master Agreement.

Please provide Information related to Parent/Owner and/or LEI Operations as noted

> Required Documentation to be Submitted with Checklist Responses

## L Data Quality Management

### Legal Name of Candidate LOU

#### Data Quality Management

Type of Document	Xref to Docs Provided	Yes	No	N/A	Additional Documentation Requested
	Please cite document and page #		Please check one		
<b>1. General and Participation in Continuous Improvement</b>					
1.1 Does your organization have a governance framework that enables it to adhere to GLEIS standards? If yes, please explain how this governance framework is structured.					
1.2 Does your organization have a continuous improvement process for data quality in place? If yes, please explain what the process steps are.					
1.3 Does your organization have a continuous improvement process for adapting to procedural changes as required for adjustments to ROC or GLEIF standard and operating principles? Please explain.					
1.4 Does your organization have a defined implementation period expectation for different types of adjustments? Please explain.					
<b>2. Data Validation</b>					
2.1 Do you have an established data library that defines proper values for fields entered in a LEI request?					Please provide a brief narrative
2.2 Do you prevent unlikely or incorrect data in submissions of LEI requests?					Please provide a brief narrative
2.3 Do you maintain procedures for :					
2.3.1 Verifying the LE-RD based on the Legal Entity jurisdiction, entity category and legal form?					Please provide a brief narrative
2.3.2 Ensuring an up-to-date list of authoritative sources used for verification is maintained, accessible and usable at all times with no restriction for all below services?					Please provide a brief narrative including all points
a. Issue new LEI					
b. Enter Legal Entity Events					
c. Manage Challenges					
d. Transfer of LEIs and LE-RD					
e. Renewals of LEIs (incl. multiple-year renewal contracts)					
2.3.3 Do you have sufficient proficiency for understanding or interpreting authoritative sources?					Please list all languages
2.3.4 Do you use other sources not listed in the GLEIF Registration Authorities list for verification/validation? If yes, please specify.					
2.4 Do you have sufficient language proficiency in the jurisdictions you are applying for understanding and interpreting the following? If yes, please list all languages.					
2.4.1 The information you receive from the legal entity?					
2.4.2 The information provided in the corresponding authoritative source for validation?					

Please provide Information related to Parent/Owner and/or LEI Operations as noted

> Required Documentation to be Submitted with Checklist Responses

## L Data Quality Management

### Legal Name of Candidate LOU

#### Data Quality Management

Type of Document	Xref to Docs Provided	Yes	No	N/A	Additional Documentation Requested
	Please cite document and page #	Please check one			
2.5 Do you have validation procedures in place for					Please provide a brief narrative including all points
2.5.1 Verifying that a Legal Entity is eligible for an LEI code?					
2.5.2 Provision of corresponding language tags for the set of specified fields?					
2.5.3 Incorporating Transliteration data for all below services?					
a. Issue new LEI					
b. Enter Legal Entity Events					
c. Manage Challenges					
d. Transfer of LEIs and LE-RD					
e. Renewals of LEIs (incl. multiple-year renewal contracts)					
2.5.4 Ensuring that LEIs are only issued when validation process is successfully completed?					
2.5.5 Verifying the LEI Record Set is compliant with the Common Data File (CDF) format (as published per <a href="http://www.gleif.org">www.gleif.org</a> )					
2.5.6 Ensuring a LEI complies with GLEIF Operational and Technical Standards (Data Quality Rule Setting) during all below services:					
a. Issue new LEI					
b. Enter Legal Entity Events					
c. Manage Challenges					
d. Transfer of LEIs and LE-RD					
e. Renewals of LEIs (incl. multiple-year renewal contracts)					
2.5.7 Researching the content of the challenge and verifying the challenge via an authoritative data source? Please explain.					
2.6 Do you comply with ISO 17442?					Please provide a brief narrative.

Please provide Information related to Parent/Owner and/or LEI Operations as noted

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	Please cite document and page #	Please check one			
<b>3. Check for Duplicates</b> Do you have procedures in place for handling each of the following					Please provide a brief narrative including all points
3.1 Checking that the LEI code does not exist already in the Global LEI Index?					
3.2 Checking, that the legal entity does not have an assigned LEI code already?					
3.3 Checking that no duplicate relationships exists?					
3.4 Identifying Exclusivity Violations by using automated routines?					
3.5 Checking the received feedback from GLEIF's Check for Duplicates facility?					
3.6 Ensuring that all newly issued LEIs are processed by GLEIF's Check for Duplicates facility?					
<b>4. Data Governance</b>					
4.1 Have you integrated the Data Governance Pre-Check API into your processes? If yes, please describe briefly.					Please provide a brief narrative.
4.2 Do you process the received feedback from GLEIF's Data Governance Pre-Check API and take actions based on this feedback? Please explain briefly.					
4.3 Do you ensure that all newly issued and updated LEIs are processed by GLEIF's Data Governance API to fulfil the Completeness Service Level Target? Please explain briefly.					
<b>5. Uploading of LEIs and LE-RD</b> Do you have procedures in place to ensure:					Please provide a brief narrative including all points and your relevant procedures documentation.
5.1 Timely response to any GLEIF communication concerning doubts, inconsistencies, or data quality issues of the uploaded data?					
5.2 Uploading LEI records at least daily?					
5.3 Confirmation to GLEIF via the GLEIF interface/ communications protocol indicating a daily "live signal" given no LEI activity occurs?					If yes, please explain the process control with respect to monitoring this condition.

Please provide Information related to Parent/Owner and/or LEI Operations as noted



Enabling global identity  
Protecting digital trust

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