When conducting web-based searches, a consistent approach should be followed. This approach starts with **what you search, which Boolean operators to use**, **in what order the searches are done**, and **how to document the results**. The goal of due diligence-related searches is to find any negative information relating to an entity.

WHAT YOU SEARCH

Web-based searching can be done for all entities, including individuals and organizations. Searches should be done in English and any other language which may be relevant (depending on location of the entity/entity's operations).

When conducting a search, make sure to account for all possible ways that the entity's or person's name might show up in public-source records:

Example: If you were searching *Barrick Gold Corporation*, searches should be conducted on *Barrick Gold Corporation, Barrick Gold Corp,* and *BGC*

Example: If you were searching *John Peter Hernandez,* searches should be conducted to account for his name showing up in search results both with and without his middle name and initial: *John Peter Hernandez, John P Hernandez,* and *John Hernandez.*

When searching an entity, if the name is rare (*Krueger Customs and Delivery Incorporated*, *Rafael Andrew Schwarzenegger*), you may just be able to search ONLY the name of the person/organization without using other words to limit the results. If your entity name is common (*Barrick Gold Corporation, John Smith*), you will get too many results to review manually.

If your search subject's name is common, you will have to limit your results by adding specific keywords to limit the number of results that come back and ensure they're relevant to the purpose of your search.

BOOLEAN OPERATORS

Google has a built-in set of text shortcuts to make searching easier. Note that if you are using a different search engine, these operators may differ.

AND	OR	*	|	NOT	-	" "	( )
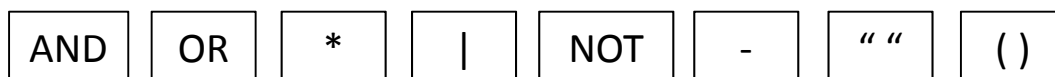
AND = both terms will be included in search results. Example: *John Hernandez AND fraud*
OR = either term will be included in search results (but not both). Example: *John Hernandez OR John P Hernandez*

* = if you aren't sure of one word in a search phrase, this wildcard will result in Google replacing it with any word found in that spot. Example: search *John * Hernandez* if you don't know what the subject's middle name is. Note that all middle names will be pulled up in the result, not just the correct one

| = this vertical line is another way of typing OR (same function). Example *John Hernandez | John P Hernandez*

NOT = this excludes a certain word from your search to eliminate irrelevant results. Example: *John Hernandez NOT soccer* (if there is a professional soccer player with the same name as your subject and you wanted to remove results relating to that person from your search results)

- = this dash is another way of typing NOT (same function). Example: *John Hernandez -soccer* (if there is a professional soccer player with the same name and you wanted to remove results relating to that person from your search results)

" " = quotes are an exact match search tool. Anything typed between the quotes will be searched exactly as it is written, this helps reduce many irrelevant results. Example: searching *"John Peter Hernandez"* will only return results written exactly in that order and with no other words in-between. Searching John Peter Hernandez without quotes will return results where those three words are all in the same document but not close to each other or related in any way.

( ) = helps organize your search string and make it easier to read. Example: *John (Peter | P) Hernandez*

IN WHAT ORDER SEARCHES ARE DONE

The goal for these searches is to a) not exclude any relevant results and b) make sure you get a small enough batch of relevant results back from your search that you can manually review them.

For a rare name, you can conduct the searches in any order. The search process for *Rafael Schwarzenegger* would be:

1. *"Rafael Schwarzenegger"*
2. *"Rafael* (Andrew | A) *Schwarzenegger"*

It's unlikely you will need to do any other searches due to a low number of results and there would be no need to limit the search using other words.

For a common name, the searches should be conducted from most broad to most narrow. That way you can ensure that you only limit searches where needed (and don't miss relevant results). First searches would just be the variations of the entity's name, and then – if many results are returned – those searches would be limited with our standard compliance-related search string:

> crime OR violation OR fraud OR convicted OR accused OR implicated OR suit OR legal OR fine OR litigation OR conduct OR "money laundering" OR regulatory OR manipulate OR court OR compliance OR investigation OR "human rights" OR guilt OR illegal OR unlawful OR arrest OR prosecuted OR case OR sentence OR bribe OR insider OR misrepresented OR mislead OR abuse OR kickback OR attorney OR indicted OR trial OR liability OR corrupt OR wrongdoing OR "wrong doing" OR risk OR scandal OR unethical OR inquiry

NOTE: Google limits searches to 32 words, therefore when using the above search string, you will need to divide the search string in a few different batches, with no more than 32 words in each search.

NOTE: Google automatically searches words similar to those typed into the search bar. If you are searching the word *crime*, results for *criminal* and *crimes* will automatically be included.

If many results come back on a search subject, the search string should be used, but only after initial searches are complete. This is the order to follow for subjects with common names or many results due to a high media/public profile:

1. *"BGC"* **– if too many results, need to limit**

2. *"Barrick Gold Corporation | Corp"* **- if too many results, need to limit**

3. *"BGC"* AND (crime OR violation OR fraud OR convicted OR accused OR implicated OR suit OR legal OR fine OR litigation OR conduct OR "money laundering" OR regulatory OR manipulate OR court OR compliance OR investigation OR "human rights" OR guilt OR illegal OR unlawful OR arrest OR prosecuted OR case OR sentence OR bribe OR insider OR misrepresented OR mislead OR abuse OR kickback OR attorney OR indicted OR trial OR liability OR corrupt OR wrongdoing OR "wrong doing" OR risk OR scandal OR unethical OR inquiry) **– if a good number of results returned, review those results manually**

4. *"Barrick Gold Corporation | Corp"* AND (crime OR violation OR fraud OR convicted OR accused OR implicated OR suit OR legal OR fine OR litigation OR conduct OR "money laundering" OR regulatory OR manipulate OR court OR compliance OR investigation OR "human rights" OR guilt OR illegal OR unlawful OR arrest OR prosecuted OR case OR sentence OR bribe OR insider OR misrepresented OR mislead OR abuse OR kickback OR attorney OR indicted OR trial OR liability OR corrupt OR wrongdoing OR "wrong doing" OR risk OR scandal OR unethical OR inquiry) **– if still too many results, need to limit further**

   NOTE: If the search string still returns too many results, you will need to limit the search further. In that case, we use the following limited search string:

corruption OR fraud OR FCPA OR CFPOA OR "human rights"

5. *"Barrick Gold Corporation | Corp"* AND (corruption OR fraud OR FCPA OR CFPOA OR "human rights") **– if still too many results, need to limit further by breaking each term in the limited search string into individual searches to identify which return results which can be reviewed and which have too many results to review meaningfully. If any specific search term still returns thousands of results, make a note in your review and move to the next search.**

HOW TO DOCUMENT THE RESULTS

Analysis of results should be documented to show that a manual review of the search results was completed, and how each result was categorized. The easiest way to do this is to print the Google result list and hand-write your notations beside each search result.
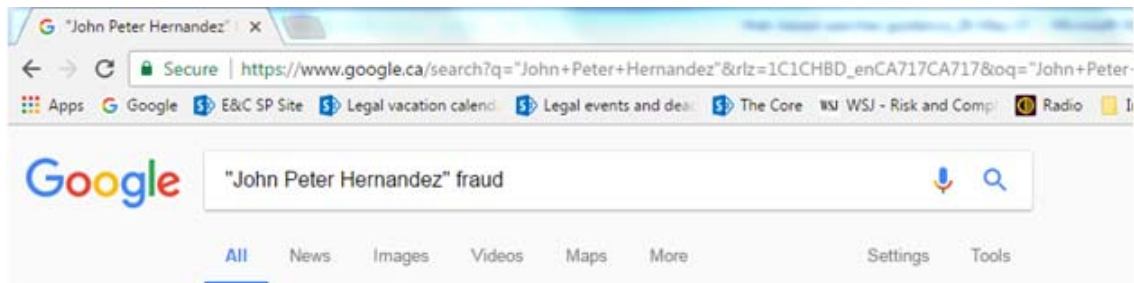
Notations for manual review:
N/R = not relevant as it doesn't relate to the subject of our search
NOT – = not negative but does relate to the subject of our search

NOTE: If you find a result that IS negative and DOES relate to the subject of the search, write a few words on the result list from Google to indicate what the article/document is about, and then print the full result/document to include in the web-search package.

Sample report notations:

Once all searches are complete, manual reviews are done and notations have been made, scan or save the batch of documents with a file name containing the entity name you are searching. Results should be saved in SharePoint in the specific entity/vendor/potential employee sub-folder in the Enhanced Due Diligence folder.