

ARIF-GENERATION

ANTI-MONEY LAUNDERING POLICY

Document title: Anti-Money Laundering Policy

Scope: Global / for all Arif-Generation staff and volunteers

Version: 1.0

Document status: Final

Approved by: Board of Trustees

Date approved: May 2024 **Effective date:** May 2024

Date of next review: May 2027



ANTI-MONEY LAUNDERING POLICY

Scope

Our charity is committed to preventing money laundering and complying with all relevant legislation and regulations. We have implemented due diligence measures and carry out risk assessments, put in place internal controls and monitoring systems to prevent money laundering.

Commitment

This policy statement provides a framework for how our charity will deal with the threat of money laundering. It is a useful tool for focusing our minds and those of our employees to make us constantly aware of the risks. We will review and update this policy regularly to ensure it remains effective and relevant to our charity's operations.

Named Individuals and Their Responsibilities

We will appoint a nominated officer who is responsible for ensuring that the charity's anti-money laundering policies and procedures are effective, and for reporting any suspicious activity to the relevant authorities. All employees and volunteers must be aware of their responsibilities under this policy.

Applicability

This policy applies to all trustees, other volunteers, employees, contractors, and third-party representatives of Arif-Generation (the "Charity"). Its requirements should be reflected in other policies and procedures, agreements and contracts, as necessary.

Due Diligence Measures and Monitoring Checks

We have procedures in place for identifying and verifying organisations and individuals, such as contractors, partners, and donors, which include obtaining identification documents, conducting risk assessments, and monitoring checks. We will keep records of all due diligence measures carried out, including identification documents, risk assessments, policies, controls and procedures, and training records.

Training

We will ensure that all employees and volunteers are trained and aware of their responsibilities under this policy.

Monitoring Controls

We have put in place monitoring controls to ensure that our policies and procedures are being carried out effectively.



Sanctions

With the crisis in the Ukraine both the Commission and banks are focussing much more on the risk of breaching sanctions. This is a complex area as the sanctions applied can be to individuals, organisations or even countries, the sanctions applied vary and other countries also apply sanctions. In some circumstances a charity may obtain a licence from OFSI or rely on an exception in the legislation.

However, other than those exemptions, it is against the law to receive money, goods or economic resources from, or send these to – an individual or organisation subject to financial sanctions. In the event of any grounds to suspect the charity may be involved, or may become involved with a sanctioned individual, organisation or work in a sanctioned country, the first step is to read the OFSI guidance below, then seek and comply with their advice.

Record Keeping

We will keep records of all customer due diligence measures carried out, including donor/contractor/partner identification documents, risk assessments, policies, controls and procedures, and training records.