Anti-Money Laundering & Counter-Terrorist Financing (AML/CFT) Policy

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Anti-Money Laundering & Counter-Terrorist Financing (AML/CFT) Policy

1. Policy Statement

Moses Welfare Foundation (MWF) is committed to conducting all activities with the highest standards of integrity, transparency, accountability, and legal compliance. The Foundation strictly prohibits the use of its programmes, financial systems, resources, partnerships, or services for money laundering, terrorist financing, fraud, organized crime, sanctions evasion, or any other form of financial crime.

As a Christian humanitarian and development organization, MWF recognizes its responsibility to protect donor funds, safeguard public trust, and ensure that all financial resources are used exclusively for lawful charitable purposes.

MWF adopts a **zero-tolerance approach** to money laundering, terrorist financing, and financial crime and will cooperate fully with competent authorities in accordance with applicable laws and regulations.

2. Purpose

The purpose of this policy is to:

- Prevent the misuse of MWF for money laundering or terrorist financing.
- Protect the Foundation's reputation and charitable resources.
- Promote transparency and financial accountability.
- Ensure compliance with applicable laws, regulations, donor requirements, and international standards.
- Establish procedures for identifying, assessing, and managing AML/CFT risks.
- Strengthen due diligence for donors, partners, suppliers, and financial transactions.

3. Scope

This policy applies to:

- Board Members
- Chairman / Executive Director
- Employees
- Volunteers
- Consultants
- Contractors
- Finance Personnel
- Procurement Personnel
- Programme Staff
- Partner Organizations
- Vendors and Suppliers where appropriate

The policy applies to:

- Donations
- Grants
- Sponsorships
- Banking transactions
- Procurement
- Vendor payments
- International transfers
- Cash handling
- Partnerships
- Asset transfers
- Relief distributions
- Financial reporting
- Online fundraising
- Digital payment platforms

4. Guiding Principles

MWF shall operate according to the following principles:

- Integrity
- Transparency
- Accountability
- Lawfulness
- Due diligence
- Risk-based decision-making
- Responsible stewardship
- Ethical partnerships
- Zero tolerance for financial crime
- Continuous monitoring

5. Definitions

Money Laundering

Money laundering is the process of concealing or disguising the illegal origin of funds or assets to make them appear legitimate.

Terrorist Financing

Terrorist financing involves collecting, providing, transferring, or using funds or other assets with the intention of supporting terrorist acts or organizations, whether or not the funds originate from lawful or unlawful sources.

Sanctions

Sanctions are legal restrictions imposed by governments or international organizations that prohibit or limit dealings with certain individuals, entities, countries, or activities.

Beneficial Owner

A beneficial owner is the natural person who ultimately owns, controls, or benefits from an organization, company, or financial transaction.

6. Risk-Based Approach

MWF shall apply a risk-based approach by assessing potential risks associated with:

- Donors
- Partners
- Suppliers
- Financial institutions
- Countries or regions of operation
- Cash transactions
- Cross-border transfers
- Emergency humanitarian responses
- New funding arrangements

Higher-risk activities shall be subject to enhanced review and oversight.

7. Due Diligence

MWF shall conduct appropriate due diligence before entering into significant financial relationships.

Due diligence may include:

- Verifying organizational identity.
- Confirming legal registration where applicable.
- Reviewing governance structures.
- Assessing reputation and background.
- Understanding funding sources where appropriate.
- Screening against applicable sanctions lists where legally required or contractually mandated.
- Evaluating financial integrity.
- Reviewing previous compliance concerns.

The extent of due diligence shall be proportionate to the level of identified risk.

8. Donor Due Diligence

MWF welcomes lawful charitable contributions from individuals, corporations, foundations, churches, and institutions.

The Foundation reserves the right to:

- Decline anonymous or suspicious donations where permitted by law.
- Request additional information regarding significant or unusual donations when appropriate.
- Refuse donations that may expose MWF to legal, ethical, or reputational risk.
- Decline donations that conflict with the Foundation's mission, values, or legal obligations.

9. Partner and Supplier Due Diligence

Before entering into significant agreements, MWF shall assess partners and suppliers by considering:

- Legal registration where applicable.
- Governance and ownership information.
- Relevant experience and capacity.
- Ethical business practices.
- Financial reliability.
- Compliance with sanctions and applicable laws where required.
- Reputation and previous performance.

10. Financial Controls

MWF shall maintain strong financial controls, including:

- Segregation of duties.
- Dual authorization for significant payments.
- Accurate accounting records.
- Budget monitoring.
- Supporting documentation.
- Independent financial audits.
- Secure banking procedures.
- Periodic reconciliations.
- Restricted access to financial systems.

11. Cash Transactions

Cash transactions shall be minimized whenever reasonably practicable.

Where cash is necessary:

- Transactions shall be fully documented.
- Receipts shall be issued.
- Cash shall be securely stored.
- Cash counts shall be performed regularly.
- Cash movements shall require appropriate authorization.

12. Monitoring of Transactions

MWF shall monitor financial transactions to identify unusual or suspicious activity.

Examples include:

- Unusually large or unexplained donations.
- Requests for payments to unrelated third parties.
- Multiple transactions designed to avoid reporting thresholds.
- Inconsistent payment instructions.
- Unusual international transfers.
- Transactions lacking a legitimate charitable purpose.

Where concerns arise, transactions may be delayed or declined pending further review where legally permissible.

13. Sanctions Compliance

MWF will take reasonable steps to ensure that it does not knowingly provide funds, goods, or services in violation of applicable sanctions laws or donor requirements.

Where applicable, screening shall be undertaken before establishing significant financial or operational relationships.

14. Record Keeping

MWF shall maintain accurate records relating to:

- Donations
- Grants
- Financial transactions
- Procurement
- Contracts
- Due diligence assessments
- Audit reports
- Compliance reviews

Records shall be retained securely in accordance with legal, donor, and organizational requirements.

15. Reporting Suspicious Activity

Any individual who suspects money laundering, terrorist financing, sanctions violations, or other financial crime must report the matter immediately to the designated AML Compliance Focal Person or the Chairman / Executive Director.

Reports shall be handled confidentially and investigated appropriately.

Where required by applicable law, MWF shall report relevant matters to the competent authorities.

16. Protection of Whistleblowers

MWF prohibits retaliation against anyone who honestly and in good faith reports suspected financial crime.

No person shall experience:

- Harassment
- Intimidation
- Discrimination
- Victimization
- Dismissal
- Other adverse treatment

Concerns shall be managed in accordance with the MWF Whistleblowing Policy.

17. Roles and Responsibilities

Board of Directors

The Board shall:

- Approve this policy.
- Provide oversight of AML/CFT compliance.
- Review significant compliance risks.
- Promote ethical governance.

Chairman / Executive Director

The Chairman shall:

- Ensure implementation of this policy.
- Promote a culture of compliance.
- Allocate appropriate resources.
- Ensure significant concerns are addressed promptly.

AML Compliance Focal Person

The designated AML Compliance Focal Person shall:

- Coordinate implementation of this policy.
- Support due diligence processes.
- Monitor compliance.
- Maintain AML/CFT records.
- Coordinate training.
- Review reports of suspicious activity.

Finance Department

The Finance Department shall:

- Monitor financial transactions.
- Maintain accurate records.
- Report unusual activity.
- Support audits and compliance reviews.

Employees and Volunteers

All personnel shall:

- Comply with this policy.
- Exercise appropriate diligence.
- Report suspicious activity immediately.
- Participate in AML/CFT training.
- Protect confidential information.

18. Training and Awareness

MWF shall provide regular AML/CFT awareness training covering:

- Money laundering risks.
- Terrorist financing risks.
- Sanctions awareness.
- Due diligence procedures.
- Financial controls.
- Reporting obligations.
- Ethical financial management.

All new personnel with financial responsibilities shall receive AML/CFT training during induction.

19. Monitoring and Compliance

Compliance shall be monitored through:

- Internal financial reviews.
- Risk assessments.
- Due diligence reviews.
- Transaction monitoring.
- Internal audits.
- External audits.
- Management oversight.
- Annual policy reviews.

Corrective actions shall be implemented promptly where deficiencies are identified.

20. Policy Violations

Failure to comply with this policy may result in:

- Corrective action.
- Mandatory retraining.
- Disciplinary action.
- Suspension.
- Termination of employment, volunteer engagement, or contracts.
- Recovery of losses where legally permissible.
- Referral to competent authorities where required by law.

21. Policy Review

This policy shall be reviewed annually or sooner if required due to changes in legislation, regulatory expectations, donor requirements, or organizational operations.

22. Commitment

Moses Welfare Foundation is committed to protecting the integrity of the humanitarian sector by ensuring that all financial resources entrusted to the Foundation are used solely for lawful and charitable purposes.

Through strong governance, effective financial controls, robust due diligence, responsible partnerships, and continuous compliance monitoring, MWF reaffirms its commitment to preventing money laundering, terrorist financing, fraud, and other financial crimes while maintaining the trust of beneficiaries, donors, partners, regulators, and the communities we serve.

Approval

This Anti-Money Laundering & Counter-Terrorist Financing (AML/CFT) Policy has been approved by the Board of Directors of Moses Welfare Foundation and is binding on all Board Members, employees, volunteers, consultants, contractors, suppliers, partner organisations, and representatives acting on behalf of the Foundation.

Approved By: Board of Directors
Moses Welfare Foundation

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Motto: *"Integrity in Every Transaction. Accountability in Every Partnership. Trust in Every Action."*

MOSES WELFARE FOUNDATION
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