

D: CSR Policies

Anti-Money Laundering, Terrorist Financing and Transfer of Funds Policy

Date of Implementation:	01/04/22
Date of last review:	15/04/24
Date of next review:	Scheduled with manual review
Related Documents:	<ul style="list-style-type: none">● Anti-Bribery and corruption policy● Anti-discrimination and harassment policy● Whistle-blowing policy

- 1. Reasons for this policy:** This policy states Mosaico EuroAfricano's (MEA) position on Anti-Money Laundering, Terrorist Financing and Transfer of Funds Policy.
- 2. Who does the policy apply to?:** This Policy applies to all organizational activities, including donations and acceptance of funds, procurement processes and supplier payments, partnerships with other organizations for the implementation of programs or other activities. This policy applies to all persons involved in these activities.
- 3. Description**

Money laundering is the term used for a number of offenses involving the proceeds of crime or terrorist funds. It includes possessing, or in any way dealing with, or concealing, the proceeds of any crime.

In legal terms, the definition of money laundering is very broad. It includes:

- handling the proceeds of crime;
- being knowingly involved in any way with criminal or terrorist property;
- entering into arrangements to facilitate the laundering of criminal or terrorist property;
- investing the proceeds of crime into other financial products or buying property and assets;
- transferring criminal property.

Anti-Terrorism: MEA is a charity, registered in Botswana, that implements projects, runs the preschool but also may allocate funds to partners for their operational / programmatic costs. It does not engage with terrorist organizations or give money to partners who carry out, or fund, or advocate terrorist activity. We are fully committed to ensuring all our business processes minimize the risk of funds being diverted for terrorist or any other criminal purposes and we achieve this by carrying out due diligence on partners. Reporting procedures :

If any member of staff knows or suspects that money laundering is taking place, they must report it through the procedures described in our whistle blowing policy. Reporting must be in the form of a **Suspicious Activity Report form** – hard copy only - see Appendix A to this document.

Any delay leaves the member of staff and the organization open to both charges of failure to report, and of assisting an offense. There is no need for the member of staff to ascertain the nature of the crime which leads them to suspect that the unusual transaction may be an instance of money laundering, only to explain what made them suspicious. The report should always be made immediately even if later knowledge proves the suspicion to be unfounded.