ANTI-MONEY LAUNDERING POLICY OF WANAWAKE TUNAWEZA TANZANIA

Maassluis, The Netherlands, 16 April 2024

1. Policy statement and purposes of this policy

- Wanawake Tunaweza Tanzania (WTT) takes a zero-tolerance approach to money laundering and terrorist financing activities and is committed to implementing and enforcing effective internal controls to counter such activities.

- Wanawake Tunaweza Tanzania's policy is to apply at a minimum the standards set out in this policy.

The purpose of this policy is to:

1. Set out the responsibilities of WTT, its Board, and people working for the foundation regarding observing, complying with, and upholding policies on anti-money laundering (AML) and counter-terrorist financing (CTF).

2. To provide information and guidance to WTT's individuals on the money laundering/terrorist financing risks arising in relation to WTT's activities, its due diligence procedures, and how to recognise and deal with any potential money laundering/terrorist financing issues if they arise.

This policy may be amended from time to time to reflect updates to all relevant laws and regulations.

2. Application of this policy

This Policy applies to all WTT individuals working with or for WTT. WTT will terminate its involvement with any individual who fails to comply with this policy.

4. Risk Assessment of [NGO]'s Activities

- iNGOs and charities can be misused by money launderers or other criminals in a variety of ways, including (but not limited) to the following:
    - A donor loans or gives a significant amount of cash to an iNGO/charity as a way to dispose of the proceeds of crime;

- A donor makes a donation with a request/condition that the funds be passed by the iNGO/charity to a specific individual or group who may appear legitimate but is actually involved in ML or TF activities;
- A recipient or beneficiary of iNGO/charitable funds use the funds received for ML or TF purposes;
- A partner organisation of the iNGO/charity with whom the iNGO/charity shares funds and/or resources is involved (without the knowledge of the charity) in ML or TF activities.

In light of the elevated risks highlighted associated with receiving and providing donations, WTT will undertake appropriate due diligence in accordance with the terms of this policy when reviewing donors, beneficiaries, and any partner organisation.

5. Donor due diligence

The donor due diligence exercise is the process by which potential donors are screened to assess whether they present a material ML/TF risk.

It involves identifying the donor, verifying their identity, and undertaking high-level media screening.

The due diligence process also enables WTT to check that the donor’s profile is consistent with the purpose and objectives of WTT.

The process should be risk-based, meaning that the higher the risk of ML/TF presented by the donor, the more extensive the due diligence process should be. The risk-based approach ensures that disproportionate time is not spent reviewing low value/low risk donations.

WTT will not as a matter of usual practice undertake due diligence on donations below the threshold of EUR 1,500 or USD 1,500, given the generally low risk of such smaller donations, as well as the impracticality of identifying the identity of small donors (e.g. street collections, charity boxes).

No anonymous donations will be accepted.

The due diligence process will be undertaken prior to or otherwise as soon as possible on acceptance of a donation from a new donor.

The due diligence process consist of at least, but not limited to:

1. Identification and verification of the donor;
2. A reasonable search of publicly available information to identify any negative news and/or other information which would increase the ML/TF or reputational risk of dealing with the potential donor;
3. Ongoing monitoring.

No donations should be accepted by WTT where material high-risk factors are present and cannot be mitigated.

In case WTT distributes cash or other forms of financial support **directly** to individuals or entities that can be seen as beneficiaries, WTT takes reasonable steps to ensure that the funds provided are used in accordance with WTT's objectives as set out in WTT's articles of association or strategy plan.

To the extent that WTT works with partner charities or organisations in furtherance of WTT's objectives, reasonable due diligence should be carried out on those entities as appropriate so as to check that that partner is bona fide and properly managed, as well as to mitigate the risk of inadvertently working with fraudulent, terrorist or otherwise criminal organisations.

The Board of Wanawake Tunaweza Tanzania is responsible for execution of the anti-money laundering policy.

6. Suspicious transaction reports

Knowledge or suspicion of money laundering or terrorist financing will be reported the the relevant authorities immediately.

7. Record Keeping

WTT will retain the original or scanned copy of documents used to identify and verify donors/beneficiaries - if and when applicable.

All documents and records will be kept throughout the relationship with the donor/beneficiary and for a period of 7 years after the end of the relationship.

Records can be retained in paper or electronic form.

8. Providing copy of policy

All WTT individuals will receive a copy of this policy and confirm in writing that they have read and understood it.

Seen and approved by the Board of Wanawake Tunaweza Tanzania.
16 April 2024.

Signed on behalf of the Board by
Marjolein Dekker
Chair of Wanawake Tunaweza Tanzania