ANTI-MONEY LAUNDERING AND COUNTER-TERRORIST FINANCING POLICY
OF
ROMILDAMOR FOUNDATION

1. Anti-Money Laundering and Counter Terrorist Financing Policy Statement

ROMILDAMOR Foundation (the "**Foundation**") is a women's rights organisation that works to support women and girl survivors of human trafficking, gender-based violence and child marriage. ROMILDAMOR's three streams of work include: (i) capacity building by providing survivors with access to career and academic development, legal support and therapy; (ii) community awareness events; and (iii) fundraising for survivors and for the operational costs of the Foundation by designing and selling womenswear. **[**As a registered charity, we must comply with applicable charity law. This includes ensuring that the Foundation's assets are safeguarded and properly used to meet the Foundation's objectives.**]** The Foundation also has a duty to protect the funds it receives from the public. In accordance with these duties, it is the policy of the Foundation to comply with all applicable anti-money laundering (**"AML"**) and counter-terrorist financing laws and regulations in the UK. This Policy addresses what we must do in order to comply with those laws and regulations. This Policy is based on a written risk assessment exercise with respect to the Foundation and its activities. Any questions concerning this Policy should be referred to [●] or their delegate (the "**Reporting Officer**").

Violations of this Policy may constitute violations of applicable laws and may subject the Foundation and Covered Persons (as defined below) to serious penalties, including fines and even imprisonment.

2. Scope

This Policy is mandatory and applies to all directors, advisors, officers, trustees and employees of the Foundation and all contractors, volunteers and consultants who devote all or substantially all of their time to the Foundation (collectively, "**Covered Persons**").

Covered Persons shall be provided with a copy of this Policy. Any Covered Person who violates this Policy may be subject to disciplinary action.

3. What is Money Laundering and Terrorist Financing?

Money laundering is the practice of concealing or disguising the origins of proceeds derived from criminal activity by creating the appearance that the proceeds are derived from a legitimate source. The underlying criminal activity can include obvious crimes such as drug trafficking, fraud, bribery or organised crime.

If successful, money laundering sustains a variety of criminal or terrorist activities by allowing criminals to maintain control over and use of their illicit funds, oftentimes to finance additional criminal activity, and to prevent their illegal activities from being detected.

Terrorist financing is the raising, moving storing and using of financial resources for the purposes of terrorism and is often linked to money laundering in legislation and regulation. Money laundering is generally intended to obscure the origin of illicit funds. Although terrorists may launder money gained

from illegal activities such as drug trafficking, the focus of terrorist financing is on which activities the funds are used for and funds can originate from both legal and illegal sources.

The UK has enacted AML laws directed at preventing the use of the financial system for money laundering, terrorist financing, and other financial crimes. The AML laws create the following offences (among others):

- Under the Proceeds of Crime Act 2002 ("**POCA**"), it is an offence for any person to possess, or in any way deal with, or conceal, the proceeds of any crime.
- Under the Terrorism Act 2000, it is an offence to possess, raise, receive or provide money or other property, or become involved in an arrangement to make money, for the purpose of terrorism, or to facilitate the laundering of terrorist money.

The broad scope of the laws, legislation, and regulations in place regarding money laundering and terrorist financing means that lawfully operating charitable companies may interact with third parties seeking to launder the proceeds of criminal activity. For example, criminals may seek to involve the Foundation at any stage in the process, for instance, by using illegal funds to make a charitable donation.

Covered Persons are required to monitor for potential "red flags" regarding money laundering and terrorist financing. A "red flag" is a fact pattern, situation, request, or other circumstance that indicates a possible money laundering or terrorist financing risk. In some circumstances, further inquiries may confirm why there was a potential red flag. In these circumstances, the situation should be documented and the information provided to the Reporting Officer. In other circumstances, concerns may still exist or a Covered Person may be unsure what steps to take. In case of doubt whether a certain fact or information known to a Covered Person constitutes a "red flag," please inquire with the Reporting Officer. Examples of potential "red flags", which are illustrative and not exhaustive, are:

- a project with a partner involving unusual payment mechanisms, or requests for cash, or for money to be paid into an account not held in the name of the partner, or in a country in which the partner is not based and not where the project is being carried out;
- an unusual or substantial one-off donation or a series of smaller donations or interest-free loans from an anonymous source or a source that cannot be identified or checked by the Foundation;
- a donation given on the condition that the Foundation transfers funds to a third party, such as an unrelated party, or to a jurisdiction other than the one in which the party is located (particularly if located in an "offshore" bank secrecy or tax haven), without the trustees being able to satisfy themselves that the funds have been properly used; or
- the donor is or has been the subject of any known formal or informal allegations (including in the reputable media) regarding possible criminal, civil or regulatory violations or infractions.

4. Policy on Money Laundering and Terrorist Financing

Engaging in transactions or activities which Covered Persons know or suspect constitute money laundering or terrorist financing is strictly prohibited by this Policy.

All payments to and from third parties should be reviewed to ensure that the correct amounts have been transmitted from or to the correct entity or individual and the correct bank account. Any concerns should be raised with the Reporting Officer.

Financial records for both the receipt and use of funds together with audit trails of decisions made should be kept and be sufficiently detailed to verify that funds have been spent properly as intended and in a manner consistent with the purpose and objectives of the Foundation.

Due diligence should also be performed on third parties giving money to, receiving money from, or performing services for or on behalf of, the Foundation, save for third parties whose only payment to the Foundation is for the purchase of scarves. This should include, but not be limited to taking a risk-based approach to the identification and verification of donors and the source of their funds, where possible and appropriate. In particular, the key details about the third party should be obtained, including who they are and where they are based. Where appropriate and proportionate, further diligence should be taken to verify the identity of the third party; for example, by checking their legal status or obtaining and contacting references. To manage reputational risk in relation to prospective donors, sponsors and partners, online searches should be conducted using the terms listed in Appendix 1 *(Key Word Searches).*

Reasonable steps should be taken to understand the specific business any third party has with the Foundation and ensure that the third party will deliver what is required.

Reasonable steps should be taken to monitor the end use of funds provided to partners and ensure there is an audit trail showing expenditure of such funds.

5. Mandatory Reporting; Safeguards Against Retaliation

The success of this Policy in preventing money laundering and terrorist financing relies on the diligence and commitment of all Covered Persons, who have a responsibility to report any suspected or actual violations and who should do so without fear of any form of retaliation.

Covered Persons who encounter a situation or are considering a course of action where the appropriateness is unclear, should discuss the matter promptly with the Reporting Officer. Even the appearance of impropriety can be very damaging and should be avoided.

Covered Persons who are aware of a suspected or actual violation of this Policy (or any other applicable Foundation policies) by others have a responsibility to report it. Covered Persons are expected to promptly provide the Reporting Officer with a specific description of the violation that is believed to have occurred, including any information about the persons involved and the time of the violation. Covered Persons should do so without fear of any form of retaliation. The Foundation will take prompt disciplinary action against any director, advisor, officer, trustee, employee, consultant, volunteer or contractor who retaliates against a Covered Person, which may include termination of services.

After making a report, the Covered Person should take no further action (such as accepting a donation or paying a questionable invoice etc.) without further instruction. The Reporting Officer will consider the circumstances, including whether a Suspicious Activity Report ("**SAR**") or other report should be made to the National Crime Agency ("**NCA**") or a 'serious incident form' should be submitted to the Charity Commission for England and Wales, and decide on the appropriate next steps.

The Reporting Officer will investigate all reported possible Policy violations promptly and with the highest degree of confidentiality that is possible under the specific circumstances. No Covered Person may conduct any preliminary investigation, unless authorised to do so by the Reporting Officer.

Cooperation by Covered Persons in the investigation will be expected. As needed, the Reporting Officer will consult with the Board of Advisors and/or external legal counsel.

It is the Foundation's policy to employ a fair process by which to determine violations of the Policy. If any investigation indicates that a violation of the Policy has probably occurred, the Foundation will take such action as it believes to be appropriate under the circumstances. If the Foundation determines that any director, advisor, officer, trustee, employee, consultant, volunteer or contractor is responsible for a Policy violation, they may be subject to disciplinary action.

If, upon further investigation of a suspicious transaction, the Reporting Officer determines that the transaction is designed to involve use of the Foundation to facilitate money laundering, terrorist financing or other illegal activity, the Foundation will refuse to consummate, withdraw from, or terminate such transaction, as appropriate. The Foundation otherwise risks committing a primary money laundering offence under sections 327 to 329 of POCA.

If there is a risk that a course of action may potentially involve the proceeds of crime, the Reporting Officer should make an 'authorised disclosure' / Defence Against Money Laundering SAR to the NCA, requesting consent to undertake the transaction or activity.

Those who may be involved in the potentially suspicious activity should not be made aware that a SAR is being considered or filed. An offence may be committed if the Reporting Officer or any other person discloses that a SAR has been made to another and such a disclosure is likely to prejudice any investigation by law enforcement.[1]

6. Questions About This Policy

Please contact the Reporting Officer if you have any questions relating to this Policy. The Reporting Officer can be reached by email at management@romildamorfoundation.org.

[●] June 2025


……..

Romilda Dompreh, Esq.
Founder of ROMILDAMOR Foundation

[1] Section 342 POCA.

APPENDIX 1

KEY WORD SEARCHES

The below terms should be used to conduct online searches in relation to the prospective donor, sponsor or partner. Search for "[*NAME*]" and each of the following:

- "bribe" (e.g. "[*NAME*]" AND "bribe");
- "fraud";
- "corruption";
- "money laundering";
- "OFAC";
- "sanctions";
- "investigation";
- "convicted";
- "crime"; and
- "criminal".