



KABALEGA FOUNDATION ANTI MONEY LAUNDERING POLICY

INTRODUCTION:

Kabalega Foundation (KF) is non-profit non -governmental organisation registered in Uganda to advance social, economic and cultural development.

POLICY STATEMENT:

Kabalega Foundation recognizes all the legislations relating to fight against Money laundering and is committed to the highest standards of probity in all of its financial dealings. It will therefore ensure that it has in place proper, robust financial controls so that it can protect its funds and ensure continuing public trust and confidence in it. Some of those controls are intended to ensure that the organisation complies in full with its obligations not to engage or otherwise be implicated in money laundering. This policy sets out those obligations, the Organisation's response and the procedures to be followed to ensure compliance.

SCOPE:

This policy applies to all persons, including managers, directors, employees consultants, contractors, trainees, casual workers, volunteers, interns, agents, sponsors, or any other person associated with us who are engaged in financial transactions on behalf of Kabalega Foundation.

Certain functions under this policy are to be undertaken by appointed Officer. For the purpose of this policy, the appointed Officer is the person responsible for all organization Finances

Any failures to adhere to this policy may be dealt with under the organisation's disciplinary or other policies as appropriate. Note that any such failures also expose the person concerned to the risk of committing a money laundering offence.

PROCEDURES:

Overview

Kabalega Foundation will:

- Conduct an annual risk assessment to identify and assess areas of risk money laundering
- Implement controls proportionate to all the risks identified;
- Establish and maintain policies and procedures to conduct due diligence on funds received;
- Review policies and procedures and carry out on-going monitoring of compliance with them;
- Appoint appoint officer to be responsible for reporting any suspicious transaction to the responsible agencies
- Provide training to all relevant staff, and provide refresher training, and
- Maintain and retain full records of work done pursuant to this policy.

The Organisation's Risk Assessment and Review

At least once a year, and more frequently if there is a major change in circumstances, the person responsible for finances will:

- Conduct an assessment of money laundering
- Review and, if necessary, revise this policy in light of that risk assessment;
- Review and, if necessary, revise the organisation's arrangement for ensuring compliance with this policy so that resources are targeted to the areas of greatest risk; and
- Report to the Audit Committee on all aspects of this policy including its implementation.

In order to facilitate the review and accountability functions the person responsible for finance will ensure:

- The availability of appropriate management information to permit effective oversight and challenge; and
- The maintenance and retention of full record of work done under this policy.

In conducting the assessment of money laundering risk arising from the organisation's work and funding activity, the person responsible for finance will have regard to the organisation's experiences and to any lessons learned in applying this policy. They will also take into account any guidance or assessments made by the government, law enforcement and regulators.

Transaction Due Diligence

Due diligence is the process by which the organisation assures itself of the provenance of funds it receives and that it can be confident that it knows the people and organisations with whom it works. In this way the organisation is better able to identify and manage risk. Due diligence should be carried out before the funds are received. Funds must not be returned before due diligence has been reviewed.

In practical terms this means:

- Identifying and verifying the identity of the funders
- Identifying and verifying the source of funds
- Identifying and in some circumstances verifying the source of wealth from which the funds are derived.

Transaction Risk Assessment

Having completed its due diligence exercise, the organisation will assess the money laundering and risk associated with the proposed transaction.

Where a transaction is considered as suspicious, or staff dealing with the transaction considers there is a suspicion of money laundering they must report the case to the person responsible for organisation finance.

Implementation

The person responsible for finance is directly responsible to the Audit Committee for the implementation of this policy. As such, with the Committee's full support, they will ensure:

- Regular assessments of the organisation's money laundering and risks are conducted and relied on to ensure the effectiveness of this policy;
- Appropriate due diligence is conducted as a result of which risks relating to individual transactions are assessed, mitigated and kept under review;
- Anti money laundering training is delivered within the organisation, including training on this policy and
- This policy is kept under review and up-dated as and when necessary, as levels of compliance are monitored.

Monitoring

The person responsible for finance will devise and implement arrangements to ensure that compliance with this policy is kept under review through regular file reviews, including reviews of due diligence and risk assessment, and reports and feedback from staff.

To enable monitoring to be conducted and compliance with the policy to be evidenced, the organisation will retain all anti money laundering records securely .

Education Training

On joining the organisation any staff whose duties will include undertaking a finance function will receive anti money laundering training as part of their induction process.

All staff undertaking a finance function will receive refresher anti money laundering training.

The organisation's anti money laundering training will include the applicable law, the operation of this policy and the circumstances in which suspicions might arise.

The organisation will provide resources to implement this policy and will ensure it is communicated and understood

The organisation will review this policy statement to reflect new legal and regulatory development and ensure good practices.

Signed:

A handwritten signature in black ink, appearing to read 'T. King', is written over a horizontal dotted line.

Date: 04/01/2020

Executive Chairperson