



Anti-Money Laundering Policy

1. Introduction and definition

The Proceeds of Money Laundering modified law # 9 for 2007 place obligations on all independent entities and its employees and governance bodies to establish internal procedures to prevent the use of their services for money laundering

Since NGOs especially in countries with fragile situation are perceived as easy setups to channel dirty money especially in cash transfers. PARC has put in place a clear policy with detailed procedures to eliminate all potential attempts to place, layer or integrate such transactions in its cash management cycle.

For the purpose of the policy **money laundering** is defined as the process of creating an appearance that an amount of money obtained from serious Criminal acts such as terrorist funds, drugs, human trafficking as if originated from legitimate source.

2. Steps of money laundering

1- **Placement**: refers to the act of introducing "dirty money" (money obtained through illegitimate, criminal means) into the financial system in some way.

2- **Layering**: is the act of concealing the source of that money by way of a series of complex transactions to make it impossible for investigators to follow a trail of evidence back to the origin of the funds.

3- Integration refers to the act of acquiring that money in purportedly legitimate means.

3. Objectives of the policy

3.1 To prevent damage to PARC's name and reputation.

3.2 To ensure effective compliance to all applicable laws and regulations related to money laundering.

3.3 To protect our employees from being misused for money laundering, terrorist financing or other financial crime.

4. Scope of the policy

4.1 This Policy applies to all employees and members of PARC Board of directors and aims to maintain the high standards of conduct that prevent criminal activity through money laundering.

4.2 The Policy sets out the procedures which must be followed (for example the reporting of suspicions of money laundering activity) to enable PARC to comply with its legal obligations.

4.3 This Policy consists a complementary part of the sits that PARC Approved to protect and prevent all illegal acts such as fraud, including the Whistle blowing Policy , Anti-Fraud and bribes policy and risk management policy .

4.4 Failure by a member as identified in 3.1 to comply with the procedures annexed to the Policy may lead to disciplinary action being taken against them.

5. What are the obligations on the PARC?

5.1 To appoint a Money Laundering Reporting Officer to receive disclosures and to submit reports to the BOD.

5.2 To translate the policy into actions across PARCs other policies

5.3 To maintain track records for all payments received or transferred above 15000 USD.

5.4 To train all PARC staff and members on how to use the policy and other relevant legislations.

6. Disclosure Procedure

6.1 No cash payment to PARC should automatically be accepted in cash (including notes, coins or travelers cheques in any currency) if it exceeds 10,000 USD.

6.2 Staff who is in charge for cash payments is asked to provide the details of any cash transaction over 10,000 USD to the money laundering officer to enable him to check the sources.

6.3 No cash transfers will be made to suppliers or service providers for amount above 50 USD.

6.4 No transfers to suppliers or service providers without obtaining the sufficient documents about his legal status in the country where he is registered.

6.5 All cheques against any disbursement will be stamped for the first beneficiary as stated on his commercial registration.

7. The Money Laundering Reporting Officer

7.1 The person in charge for receiving disclosures about money laundering activity within the PARC head of financial department.

8. Policy review

Head of the financial department, the treasurer of the BOD and director General will ensure the continuous review and amendment of this policy document when ever needed and in annual base.