



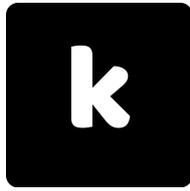
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KINDCODY POLICY - COUNTER TERRORISM AND ANTI-MONEY LAUNDERING

Revised: 10 APRIL 2021

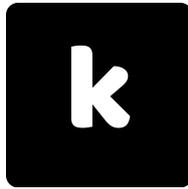
Policy

1. KINDCODY's resources must not be used to support criminal purposes, including terrorist purposes.
2. KINDCODY will assess the risks of becoming involved with terrorism, extremism and money laundering as normal practice when designing and implementing projects.
3. KINDCODY will put in place proportionate measures to manage those risks, while continuing to work in difficult and challenging places. This includes additional policy documents such areas KINDCODY's anti-bribery policy.
4. This policy applies to all KINDCODY operations worldwide.
5. KINDCODY is committed to:



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- 5.1. having systems, procedures and controls in place to ensure that it manages the risk of becoming involved in financing or supporting terrorist activity, extremist activity or money laundering;
- 5.2. for the highest risk transactions, checking that KINDCODY employees, those KINDCODY funds or works with are not on any terrorism lists, financial sanctions lists or other regulatory compliance lists and assessing the risks if they are;
- 5.3. training its staff so that they have an awareness of the risks related to terrorist activity, extremism or money laundering
- 5.4. ensuring that its staff understand their obligations to report any actual or suspected terrorist activity or money laundering;
- 5.5. meeting its obligations to report to external authorities.
6. KINDCODY requires all those receiving KINDCODY funds to act in accordance with this policy to ensure that our funds and assets are not used to finance or support terrorist activity, extremism or to launder money.
7. KINDCODY will provide adequate and appropriate resources to implement this policy and will ensure it is communicated and understood by all KINDCODY employees, volunteers, contractors associated with KINDCODY worldwide on an annual basis. This will also be provided to all new employees as part of their induction.



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8. The ICAEW AML Service provided by CreditSafe will be used and an appropriate AML system selected based on the profile of the organisation/individual to be checked.
9. KINDC ODY will review this global policy statement annually to reflect new legal and regulatory developments and ensure good practice.
10. The AMAR ICF Treasurer is responsible for ensuring this policy is maintained and implemented with oversight from the Board of Directors.

Entry into Force

11. This policy is effective immediately.

Chris Frost, Chief Operating Officer