

Anti-Money Laundering and Counter-Terrorism Financing (AML/CFT) Policy

Species Saviour Initiative (SSI)

April, 2025

Purpose

Species Saviour Initiative (SSI) is committed to the highest ethical and professional standards in all our operations. We recognize the risks posed by money laundering and terrorist financing, particularly within fragile contexts such as Somalia, where weak financial systems and prolonged conflict have increased vulnerability to such practices.

This Anti-Money Laundering and Counter-Terrorism Financing Policy (the “Policy”) aims to safeguard SSI’s resources, reputation, and partnerships from misuse and to ensure that our conservation and peacebuilding work is not compromised by association with illegal financial activities.

Definitions

- **Money Laundering**
Money laundering refers to the process of concealing or disguising the origins of funds obtained from illegal activities, often by transferring them through legitimate businesses or organizations to make the funds appear lawful.
- **Terrorist Financing**
Terrorist financing includes the provision of financial resources, assets, in-kind support, or technical assistance with the intention, or knowledge, that they will be used to carry out or support terrorist acts.

Objectives

Applying a risk-based approach, this Policy sets out SSI’s internal standards, controls, and expectations to reduce the risk of exposure to money laundering and terrorist financing. Specifically, SSI commits to:

- **Prevent misuse of SSI funds** for money laundering or terrorism financing.
- **Comply with applicable AML/CFT legislation and donor requirements**, including relevant Somali, Kenyan, and international standards.
- **Avoid reputational risk** that could undermine our conservation, community, and peacebuilding mandate.
- **Support partners and grantees** in strengthening their capacities to manage AML/CFT risks.
- **Protect SSI from relationships or transactions** that may facilitate financial crime or terrorism.
- **Apply risk-based due diligence** on all donors, partners, contractors, and grantees.

- **Continuously review and adapt** SSI's AML/CFT procedures in line with evolving threats, risks, and international best practices.

Scope

This Policy applies to all SSI staff, board members, contractors, volunteers, and delivery partners. It covers the use of SSI funds, donations, grants, contracts, and other financial flows managed or supported by SSI.

Principles and Standards

1. **Zero Tolerance:** SSI has zero tolerance for money laundering, terrorist financing, or related financial crimes.
2. **Transparency:** All SSI financial transactions must be traceable, documented, and auditable.
3. **Due Diligence:** SSI will conduct reasonable checks on donors, partners, vendors, and grantees to ensure they are legitimate and not involved in financial crime or terrorism-related activities.
4. **Compliance:** SSI will comply with applicable Somali, Kenyan, and international financial integrity laws, as well as donor-specific AML/CFT requirements.
5. **Capacity Building:** Where appropriate, SSI will support local partners and grantees in strengthening their own financial controls to meet AML/CFT standards.
6. **Reporting:** Staff and partners are required to promptly report any suspicious activity or concerns related to money laundering or terrorist financing through SSI's reporting channels.

Implementation: AML/CFT Program, Procedures, and Due Diligence

SSI adopts a **risk-based approach** to due diligence of donors, staff, delivery partners, contractors, and grantees to detect and address risks related to money laundering and terrorist financing. Our procedures and mitigation measures are proportional to the level of risk identified, ensuring that SSI's resources are allocated in the most effective way to safeguard both organizational and donor integrity.

1. Sanctions Screening

As a conservation nonprofit operating in Somalia and the region, SSI must demonstrate that all funds are used for legitimate and charitable purposes, and that none of our resources are directed toward sanctioned individuals, groups, or entities. To meet these requirements, SSI will:

- Conduct AML/CFT-related risk assessments for staff, delivery partners, and donors.
- Verify the identity of key partners, contractors, and grantees.
- Screen against relevant sanctions lists, including those maintained by the **United Nations, European Union, African Union, and international donor governments**, to ensure compliance with global standards.
- Maintain documentation of screenings, decisions, and actions in line with SSI's record-keeping standards.

2. AML/CFT Capacity Assessments

SSI conducts occasionally AML/CFT capacity assessments for grantees and delivery partners. Where gaps are identified, and depending on the level of risk, SSI will:

- Provide guidance on appropriate due diligence and screening procedures.
- Support capacity building for partners in areas such as financial transparency, compliance, and risk management.
- Offer training or written guidance to strengthen partners' ability to detect and mitigate AML/CFT risks.

3. Donor Due Diligence

SSI applies a **risk-based donor due diligence approach** to ensure that the organization has a reasonable understanding of the true identity, legitimacy, and intent of all donors. This includes:

- Collecting and verifying donor information, commensurate with the donation size and associated risk.
- Applying a risk matrix to assess donor background, source of funds, and alignment with SSI's mission.
- Documenting findings to demonstrate transparency and accountability to stakeholders.

4. Records Retention

SSI will maintain proper records of all AML/CFT-related assessments, screenings, and decisions. These records will:

- Demonstrate due diligence in preventing misuse of SSI funds.
- Provide sufficient documentation for compliance with applicable Somali, Kenyan, and international authorities.
- Be retained for a minimum of **seven years**, or longer if required by donor or national regulations.

5. Reporting and Mitigation

Any SSI staff, partner, or stakeholder who knows, suspects, or has reasonable grounds to believe that money laundering or terrorist financing may be occurring in connection with SSI's operations must report it immediately.

- Reports can be made to SSI's **Executive Director, Finance & Compliance Officer, or through SSI's integrity reporting mechanism.**
- Reported cases will be investigated confidentially, and appropriate action will be taken, which may include suspending or terminating relationships, blocking or reversing transactions, or notifying relevant authorities and donor organizations.
- All disclosures and investigations will be documented in line with SSI's Record Retention Policy.

6. Training and Awareness

SSI will ensure that staff and relevant delivery partners receive **regular AML/CFT training** to strengthen their awareness of:

- The obligations, rules, and procedures outlined in this Policy.
- Identifying red flags, suspicious activities, and risks related to financial misuse.
- Procedures for reporting concerns or suspected AML/CFT violations.
- Consequences of non-compliance for both individuals and the organization

Consequences of Policy Violations

- **For SSI Staff:**
Any violation of this Policy by SSI staff will result in disciplinary action. Depending on the severity of the violation, this may include formal warnings, suspension, or termination of employment.
- **For SSI Partners, Grantees, or Contractors:**
Any violation of this Policy or failure to comply with related contractual obligations will result in remedial measures. These may include suspension or termination of the partnership, grant, contract, or sub-award with immediate effect.

SSI reserves the right to notify relevant authorities and donors where serious breaches of this Policy are identified.