	Document No.	F&A 008
	Effective Date	November 20, 2023
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Anti-Money Laundering Policy		

POLICY STATEMENT —

The World Federation of Hemophilia (together with its subsidiaries and consolidated affiliated entities, collectively referenced as the “**WFH**”) is an international charitable and not-for-profit organization dedicated to saving and improving the lives of people with hemophilia and other inherited bleeding disorders. WFH is unwavering in its commitment to conducting all its business and activities in accordance with the highest ethical and legal standards. It expects all individuals working on its behalf to share this commitment.

This commitment entails full compliance with both the explicit requirements and the underlying principles of all applicable multi-jurisdictional laws and regulations designed to combat money laundering and counter the financing of terrorist or criminal activities (all collectively referred to as “**Anti-Money Laundering Laws**” or “**AML Laws**”). It also includes compliance with the local laws and regulations in the various jurisdictions where WFH and its subsidiaries or affiliated entities operate.

WFH categorically prohibits any involvement in or support for money laundering or terrorist financing. We will not engage in business with anyone suspected of participating, knowingly or unknowingly, in such activities.

1. PURPOSE

1.1 The primary aim of this Policy is to mitigate the risk of unintended use of WFH resources for money laundering (“**ML**”) or terrorist financing (“**TF**”) and to ensure full compliance with both international and local AML Laws and regulations. This Policy clarifies the individual responsibilities we all share in adhering to AML laws worldwide. It emphasizes the importance of all individuals working for or acting on behalf of the WFH to adhere to these standards.

2. SCOPE


2.1 This Policy applies to WFH’s operations globally, including all WFH officers, directors, employees, and volunteers (collectively referenced as “**WFH Team members**” or “**Team members**”). It also extends to all member organizations, partners, contractors, suppliers, external experts, consultants, and any other organizations or individuals acting on behalf of WFH or under WFH's guidance (collectively referenced as “**Partners**”).

2.2 While the majority of WFH's financial activities may be considered low risk in terms of ML/TF, it remains imperative that all Team members and Partners remain vigilant against potential financial crimes and fraud risks faced by WFH. Although instances of suspected ML/TF are expected to be rare within WFH, it is essential for all individuals to be aware of the relevant legislative requirements.

3. DEFINITIONS

3.1 For the purposes of this Policy, the following definitions apply to terms as they are used in the document:

- a) “**Counterparty**”: The opposing or participating party in a transaction or business relationship, which may encompass individuals, businesses, governments, donors, suppliers, or other diverse entities or organizations.

	Document No.	F&A 008
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Anti-Money Laundering Policy		

- b) **“Money laundering” or “ML”**: The process of concealing or disguising the existence, source, movement, destination or illegal application of illicitly derived property or funds to make them appear legitimate. It usually involves a three-part system: (1) *placement* of funds into a financial system; (2) *layering* of transactions to disguise the source, ownership, and location of the funds; and (3) *integration* of the funds into society in the form of holdings that appear legitimate¹.

Money laundering can manifest in various ways, such as dispersing funds across numerous bank accounts to obscure their origins, or it may occur inadvertently when an organization is unwittingly used as a "trading partner". These occurrences could involve WFH or its subsidiaries and related entities.

- c) **“Terrorist financing” or “TF”**: The utilization of funds, whether legitimately acquired or unlawfully generated, for illicit purposes, including the facilitation of criminal activities and the support of terrorist groups.


4. KEY PRINCIPLES AND OBLIGATIONS

- 4.1 Risk-based approach. WFH has zero tolerance for the facilitation of money laundering or any activity that facilitates the funding of terrorist or criminal activities, and is committed to the highest level of transparency, integrity, and accountability. Zero tolerance means that WFH will make reasonable efforts to prevent ML/TF from happening using a risk-based approach to its due diligence of donors and counterparties.
- 4.2 WFH Team member obligations. The above broad definition of money laundering means that anybody (including any WFH Team members and/or Partners) could potentially be in violation of AML Laws if they become aware of, or suspect, money laundering and either participate in or fail to report such activities.
- 4.3 Non-compliance. Compliance with this Policy is mandatory. Violation or non-compliance is a serious matter and will be reported to the relevant authorities in accordance with applicable local and international laws. Any WFH Team members and/or Partners who deliberately breach the rules outlined in this Policy, or who permit others to do so, will be subject to disciplinary actions in accordance with applicable laws, including but not limited to potential termination of their employment, tenure, or contractual relationships.
- 4.4 Suspicious transactions. All WFH Team members and Partners are expected to maintain vigilance in identifying and reporting any suspicious activities or transactions related to funds that may be linked to criminal activities or terrorist financing.

5. COUNTERPARTY DUE DILIGENCE

- 5.1 It is the policy of WFH to carry out due diligence checks at the outset of any prospective business relationship and, if necessary, where any red flags arise subsequently on its donors, counterparties or any person with whom WFH has an established business relationship that will involve the transfer or receipt of funds. The objective is to enable WFH to form a reasonable belief that the counterparty is who they say they are and to

¹ Definition taken from “AML Glossary of Terms”, Association of Certified Anti-Money Laundering Specialists (ACAMS), <https://www.acams.org/en/resources/aml-glossary-of-terms#r-a2e69f47>.

	Document No.	F&A 008
	Effective Date	November 20, 2023
	Revision Date	
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Anti-Money Laundering Policy		

ensure that there are no legal barriers to engaging with them before any contracts are signed or transactions are executed.

5.2 Our counterparty due diligence measures encompass the following key components:

1. **Identification and Verification:** We diligently identify the counterparty and validate their identity using documents, data, or information sourced from reliable and independent channels.
2. **Beneficial Ownership Assessment:** When the ultimate beneficial owner(s) of a business differs from the counterparty, we take steps to identify and confirm the identity of these ultimate owner(s) or controller(s). This ensures that we have a comprehensive understanding of who truly owns and oversees the business.
3. **Purpose and Nature Assessment:** We evaluate the information provided regarding the purpose and intended nature of the business relationship.

To facilitate this due diligence process, the Know Your Counterparty Form (see Appendix A) must be completed. This form serves as a tool for our due diligence verification process, ensuring that WFH maintains a thorough and compliant approach to its business relationships.

5.3 In cases where donors wish to remain anonymous, WFH will seek to ascertain their identity by reaching out to individuals who may possess knowledge of the anonymous donor, contacting the financial institution from which the donation originated to trace the source of the funds, or taking other reasonable steps to identify the donor. If our inquiries do not raise any red flags, WFH will accept the anonymous donation.

5.4 In situations where WFH cannot reasonably establish confidence in its knowledge of a counterparty's identity, or if questions arise regarding the source of a counterparty's income or assets, WFH will refrain from engaging in any business transactions with the counterparty.


5.5 If after receiving a donation or completing a transaction with a counterparty, WFH becomes aware of information that suggests the potential involvement of money laundering in the donation or transaction, WFH will take all practical and feasible steps to either return the donation to the donor or cease all forms of transactions with the counterparty.

6. RECORD-KEEPING

6.1 WFH maintains confidential records of all data and documents obtained during the due diligence verification process. These records will be retained for the duration of the relationship with the counterparty and for a minimum of seven (7) years following the conclusion of the relationship or transaction. Records may also be retained for as long as required by applicable law, whichever duration is longer.

7. DISCLOSURE PROCEDURE

7.1 In the event that anyone has knowledge, suspicion, or reasonable grounds to believe that an individual is involved in money laundering or terrorist financing, or if they become concerned that their participation in a transaction may potentially amount to a breach of

	Document No.	F&A 008
	Effective Date	November 20, 2023
	Revision Date	
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Anti-Money Laundering Policy		

AML Laws, they must report such matters immediately to the WFH Compliance Officer (directly contact the Compliance Officer or disclose the issue via the WFH compliance email at compliance@wfh.org) or WFH CEO. Disclosure should include as much details as possible, including:

- Individuals and/or businesses involved, including yourself and other Team members and Partners, if relevant
- The type of transaction and role of each person in the transaction
- The reason(s) for suspicion
- Dates of relevant transactions
- Details of where and how the activity was conducted
- Likely amounts of money or assets involved; and
- Any other information that may be relevant to the case

7.2 Upon reporting suspicions to the Compliance Officer or CEO, individuals must adhere to any advice and instructions provided. They should not make further inquiries unless explicitly instructed to do so. Under no circumstances should suspicions be shared with the person(s) suspected of money laundering or terrorist financing, and discussions about the matter with third parties are strictly prohibited.

7.3 The Compliance Officer is responsible for investigating the case within sixty (60) days of receiving a disclosure report. The Compliance Officer will review the report and any additional relevant information, conduct further inquiries if necessary, and, if appropriate, consult with the WFH CEO and Finance and Administration Director or seek outside legal counsel, if appropriate. Following the assessment, the Compliance Officer will determine:

- Whether there are reasonable grounds to suspect money laundering or terrorist financing and the appropriate steps to be taken
- Whether the matter needs to be reported to the relevant governmental agency or enforcement authorities


7.4 All disclosure reports submitted to the Compliance Officer or CEO and reports made by WFH to governmental or enforcement authorities will be retained for a minimum of seven (7) years.

8. COMMUNICATION AND TRAINING

8.1 To ensure that all are informed about their responsibilities under AML Laws, WFH's counterparty due diligence procedures, and the process for reporting suspicious activity or transactions, this Policy will be published on the WFH's website. A copy will be provided to WFH Team members and Partners and will also be available on the WFH's staff Intranet and Board Intranet for their review. All will be notified of significant policy changes. New WFH Team members and Partners will receive a copy of this Policy and will be educated about its significance.

9. ENTRY INTO FORCE AND REVISION

9.1 This Policy becomes effective upon its adoption by the WFH Board of Directors. It is subject to periodic revision to align with evolving legislation, international standards, or changes in business operations.

	Document No.	F&A 008
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Anti-Money Laundering Policy		

ACKNOWLEDGEMENT AND AGREEMENT —

I, (_____ PRINT NAME) certify that I have read, understand, and received a copy of the **WFH Anti-Money Laundering Policy** (the “Policy”). Furthermore, I agree to adhere to this Policy, and I understand that if I contravene the Policy outlined herewith, I may face corrective action, including the termination of my employment or the termination of my tenure or contract.

Signature: _____

Date: _____