



## Sudanese Community Association, Cork - SAC

### Donations and Members Subscriptions Policy

12/04/2022

#### 1. Introduction

The Sudanese Community Association Cork (SAC) is committed to upholding the highest ethical standards and preventing its resources from being misused for criminal activities. This Anti-Money Laundering (AML) Policy outlines the procedures we will follow to identify and mitigate the risks of money laundering and terrorist financing.

#### 2. Purpose

This policy aims to:

- Comply with Irish law regarding charities and anti-money laundering.
- Minimize the risk of SAC being used to launder criminal proceeds.
- Protect the reputation and integrity of SAC.
- Ensure the responsible use of all donations and funds received.

#### 3. Responsibilities

- **Board of Directors:** The Board is ultimately responsible for ensuring compliance with this policy and overseeing its implementation.
- **Finance Officer:** The Finance Officer is responsible for implementing this policy and maintaining all related records.
- **All Staff and Volunteers:** Everyone involved with SAC has a responsibility to be aware of this policy and report any suspicious activity.

#### 4. Due Diligence on Donors and Beneficiaries

SAC will conduct due diligence on all donors and beneficiaries, particularly those:

- Making large or unusual donations.
- Donating anonymously or through third parties.





- Located in high-risk countries for money laundering.
- Associated with activities that could raise suspicion.

Due diligence procedures may include:

- Verifying donor identity with official documents (e.g., passport, driver's license).
- Obtaining information about the source of funds.
- Checking donors against sanctions lists.
- Understanding the purpose of donations and how they will be used.

## 5. Monitoring Transactions

SCAC will monitor all transactions, particularly those involving:

- Cash donations exceeding a certain threshold (to be determined by the Board).
- Wire transfers from anonymous sources.
- Multiple small donations from the same source.
- Transactions that appear inconsistent with the donor's profile or stated purpose.

## 6. Record Keeping

SCAC will maintain detailed records of all donations and financial activities, including:

- Donor details (name, address, contact information).
- Donation amount, source, and date.
- Purpose for which the donation will be used.
- Copies of identification documents (for high-risk transactions).
- Records of due diligence procedures conducted.

Records will be kept for a minimum period as required by Irish law.

## 7. Reporting Suspicious Activity

Staff and volunteers are encouraged to report any suspicious activity related to donations or financial transactions. Reports should be made to the Finance Officer or any member of the Board.



SAC will report any suspected money laundering activity to the Irish authorities in accordance with legal requirements.

## 8. Training and Awareness

SAC will provide training to staff and volunteers on AML procedures and how to identify suspicious activity.

## 9. Review and Update

This policy will be reviewed and updated regularly to reflect changes in Irish law and best practices in AML compliance.

## 10. Disclaimer

This policy is intended as a guide and does not constitute legal advice. SAC recommends seeking professional legal advice to ensure compliance with all relevant Irish laws and regulations.

## Further Resources

- The Charities Regulator (Ireland): <https://www.charitiesregulator.ie/>
- Financial Intelligence Unit of Ireland: <https://www.garda.ie/en/crime/fraud/what-does-the-financial-intelligence-unit-fiu-have-responsibility-for-.html>

Treasurer

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