

Southern Africa Philanthropy Foundation (SAPF)

Anti-Terrorism and Anti-Money Laundering Policy

Effective Date: 1 March 2025

Review Date: [1 March 2026]

Approved By: SAPF Board of Trustees. Responsible: SAPF CEO

1. Purpose

The purpose of this policy is to prevent and detect any misuse of the Southern Africa Philanthropy Foundation's resources or activities for terrorist financing, money laundering, or any other form of illicit financial activity. SAPF is committed to maintaining the highest ethical standards and complying with relevant national and international laws.

2. Scope

This Policy Applies to:

- All SAPF employees, Board members, volunteers, and contractors.
- All partner organizations, grantees, and service providers.
- All financial transactions and project disbursements.

3. Legal and Regulatory Framework

SAPF aligns its practices with:

- The Financial Intelligence Centre Act (FICA) of South Africa.
- The Prevention of Organised Crime Act (POCA).
- The Protection of Constitutional Democracy Against Terrorist and Related Activities Act (POCDATARA).
- FATF Recommendations (Financial Action Task Force).
- Relevant United Nations Security Council Resolutions.

4. Key Definitions

- Money Laundering: The process of concealing the origins of money obtained illegally.
- Terrorist Financing: The act of providing funds or financial support to individuals or groups engaging in terrorist activities.
- Beneficial Owner: The natural person who ultimately owns or controls a beneficiary of SAPF funding or services.

5. Policy Statements

Southern Africa Philanthropy Foundation (NPC) | Studio 16, Arts on Main | 264 Fox Street City & Suburban, Johannesburg, 2094 | South Africa
E: info@sa-pf.org.za | W: www.sa-pf.org.za | T: +27 11 334 0404 | F: +27 11 334 0580

Board of Directors

Jo-Ann Pohl (Chairperson), Gill Bates, Danni Dixon, Joanne Donald, Luyanda Matlala, Kgomo Mufamadi, Ziaad Suleman

Non-Profit Company (NPC) Registered NPO: 014-831
Registered PBO with 18A Status 930002036

B-BBEE Status: Exempted Micro Enterprise; Level 4 Contributor, Sco Beneficiary Analysis: 91%, 100% SED Recognition

5.1. Risk-Based Approach

SAPF will apply a risk-based approach to assess and mitigate potential risks related to terrorism and money laundering.

5.2. Due Diligence and Verification

SAPF will:

- Conduct Know Your Partner (KYP) and Know Your Beneficiary (KYB) checks.
- Require documentation on legal status, governance, and beneficial ownership.
- Verify identities through national registration systems and reputable third-party sources.
- Screen all partners and staff against international sanctions and watchlists.

5.3. Transaction Monitoring and Record Keeping

- All financial transactions must be traceable and documented.
- Funds may only be transferred through reputable, traceable banking channels.
- Records of all due diligence and financial transactions will be kept for at least five (5) years.

5.4. Sanctions and Watchlist Screening

SAPF will maintain up-to-date checks against UN Sanctions Lists, OFAC, and local government watchlists.

6. Reporting and Compliance

6.1. Suspicious Activity Reporting (SAR)

All employees must report suspicious transactions or behaviors to the Compliance Officer or FIC.

6.2. Whistleblower Protection

SAPF encourages good faith reporting and will protect whistleblowers against retaliation.

6.3. Non-Compliance

Failure to comply with this policy may result in disciplinary action, including termination and legal consequences.

7. Roles and Responsibilities

Role	Responsibility
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Board of Trustees	Oversight and policy approval
Executive Director	Policy implementation and enforcement
Compliance Officer	Daily compliance monitoring, training, and reporting
Finance & Grants Team	Due diligence, documentation, and monitoring
All Staff and Partners	Adherence to the policy and reporting of suspicious activity

8. Training and Awareness

SAPF will ensure regular training for staff, Board members, and partners on AML/CFT risks, detection methods, and reporting procedures.

9. Policy Review

This policy shall be reviewed annually or as required by changes in law or operations.

10. Contact Information

Chief Operating Officer
 Southern Africa Philanthropy Foundation
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 Tel: [011 334 0404]

Gill Bates

CEO

1st of April 2025.