

ANTI-MONEY LAUNDERING AND ANTI-WHITEWASHING POLICY

- 1 Introduction – A Policy to ensure Prevention of Money Laundering and Consideration of Whitewashing**
 - 1.1 This policy is to ensure that Thrive Scotland (Thrive) operates controls and procedures to prevent money laundering and takes considered decisions on whitewashing.
 - 1.2 This policy defines money laundering as the conversion of criminally-obtained assets or money into clean money, for example donations to Thrive. It defines whitewashing as donations of assets or money from sources whose activities would be considered criminal if taking place in the UK.
- 2. Thrive approach to preventing money laundering and reducing whitewashing**
 - 2.1. Thrive checks the organisations and individuals who give money or goods-in-kind to Thrive, to ensure that they are not known to UK or other government authorities for obtaining money or assets criminally or for receiving money or assets from others who have obtained them criminally.
 - 2.2. Thrive is not one of the types of business which require to register with HMRC (Her Majesty’s Revenue and Customs), but is obliged to and wishes to hinder money laundering where it can.
 - 2.3. Thrive considers on a case-by-case basis whether to accept funds and assets from sources whose activities are not criminal in UK law but whose activities if taking place in the UK would be criminal under UK law.
 - 2.4. The Thrive Director of Finance is responsible for implementation of measures to prevent money laundering, and all Thrive Directors share responsibility to identify, review and jointly decide whether to accept funds whose purpose may be whitewashing.
- 3. Procedures to identify and verify customers and donors, due diligence measures and monitoring checks**
 - 3.1. Thrive checks that its donors and customers donating over £10,000 (including when broken down into several smaller payments) are who they say they are. Thrive checks such organisations’ registration with Companies House, their directors and, if relevant, their beneficial owner. Thrive checks such donating individuals’ name, photograph on an official document, residential address and date of birth.
 - 3.2. Thrive conducts enhanced due diligence when such donors and customers are not physically present when we conduct identification checks, when the individual is “politically exposed” (member of a parliament, head of state or government or government minister and their family members and close associates), or if the person is from a high risk third country; in 2019 these are Afghanistan, Bosnia and Herzegovina, Guyana, Iraq, Lao PDR, Syria, Uganda, Vanuatu, Yemen, Iran and Democratic People’s Republic of Korea.
- 4. Training of Thrive Directors, employees, consultants and volunteers**
 - 4.1. The Finance Director is the nominated officer for this policy. The Finance Director leads review of compliance at every quarterly Board meeting, thereby training Thrive Directors, and including checking that any Thrive Director overseeing employees, consultants or volunteers has trained them in this Policy.
- 5. Monitoring Controls to ensure that this Policy is implemented**
 - 5.1. The Finance Director checks every source of funds to Thrive, and leads review at board meetings of potential sources of funds to Thrive.
- 6. Importance of Thrive Directors, staff, consultants and volunteers reporting any suspicious activity**
 - 6.1. Directors, staff, consultants and volunteers commit to reporting any suspicious activity to the Director of Finance.
- 7. Policy review**

Policy owner	Director of Finance
Reviewed annually	Board of Directors
Policy date	August 2019
Next policy review date	August 2020