



**DONOR MANAGEMENT
POLICY**

THOMAS'S FOUNDATION [CIO]

Registered Charity No. 1181145

DONOR MANAGEMENT POLICY

THOMAS'S FOUNDATION [CIO]

1-The need for a policy

The Policy recognises the significant and valuable role donors play in supporting the Thomas's Foundation in delivering to its objectives as per its Constitution

This Policy reflects our commitment to donor management as a key ingredient in reaching out to our benefactors and provides essential principles, procedures and best practice to ensure effectiveness of every support given to TF

Donors bring in the means to support the much needed hard work into delivering the objectives of the TF, but in the regulated sector that charitable Foundations operate in, all must be clear about what it takes to make the donor management as effective, safe and value adding as it can possibly be

We hope this Policy considers the interests of the donors, that all benefactors and representatives are protected and that donations are documented appropriately and transparently, recognising that security of donor's personal information is critical as well as a regulatory requirement under UK law. This Policy also enshrines the donation acceptance principles which the TF will operate in line with its regulatory requirements¹

2-Policy objective

The Policy intends to specify the principles applicable to:

- the clear and transparent acceptance of financial and non-financial philanthropic gifts, donations and other support to TF
- donor recognition
- safeguarding of donor information
- the return of non-acceptable donations
- due diligence undertaken to establish acceptability of the donations
- due diligence required in relation to all partners that collaborate with TF to execute charitable activity

¹ Key applicable regulation include:

The Charities Act 1992: in relation to commercial participators and professional fundraisers.

The Charities Act 2011: in relation to seeking the views of the Charity Commission on whether to accept or refuse a particular donation, or an order to sanction the trustees' dealings with charity property.

The Bribery Act 2010: in relation to bribery offences.

Finance Act 2011: in relation to tainted charity donations.

Proceeds of Crime Act 2002: in relation to suspected money laundering.

Terrorism Act 2000: in relation to disclosures of beliefs or suspicions of terrorism offences.

3-Scope

The Policy applies to all donations and all donors as defined below:

Donations mean:

- Gift/grant: usually made in cash, but may also include shares, property, services, chattels or the income from investments
- Pledge: a commitment to give a specific amount according to a fixed time schedule and under certain conditions of payment
- Gifts-in-Kind: donation of products or services to TF²
- Endowment: a gift to be invested in an endowment fund for the purpose of producing present and future income that may be expended or reinvested with the original gift. An endowment may arise by bequest in a will or during a donor's lifetime
- Legacies, which can include:
 - Residuary legacies – a gift made of some or all of the remainder of an estate after all other gifts have been handed out and debts paid off
 - Pecuniary legacies – a gift made of a fixed sum of money
 - Specific legacies – a particular named item left as a gift in a will, for example shares, property, jewellery, furniture or a painting

Donors mean:

- Persons or institutions which provide donations to TF

The Policy applies to all partners and charitable activity as defined in section 4

4- Definitions

What is an acceptable donation?

Legitimate donations made in a legal and compliant manner which can be used to further the objectives of TF

What is donation?

All charitable giving (also charitable funds, grants, gifts, donations) in scope of this Policy which is used to fund the activity of the TF for the benefit of its ultimate beneficiaries

What is donor management?

The obligation undertaken by TF to manage its obligations towards donors in line with regulatory requirements. This includes obligations in relation to:

- The donor whether a person or an entity
- The donation itself in relation to its origin and legitimacy
- The intended use of the donation and any conditions attached to it

²● The donor should obtain an independent valuation of the gift in order to negotiate any recognition or letter of tax deductibility sought.

- The scrutiny of the partners which may collaborate with TF in the execution of charitable activities

What are the risk affecting donor management?³

There are key risks associated to uncompliant donor management including that donors and /or partners may be involved in:

- Money laundering
- Acceptance of proceeds of crime
- Tax avoidance/evasion
- Fraud

Due diligence, monitoring and the end use of funds

In relation to charitable giving, donors must expect TF to undertake due diligence of the gift, monitoring of how funds are managed and applied to the cause and a view of the end use of all funds

Where donors provide charitable funds to TF, the Foundation have the corresponding obligation to take appropriate steps to verify that charity funds reach their proper destinations and are used as intended

Partners⁴

This refers to the organisations with which TF collaborates to undertake is charitable activities which include Thomas's London Day Schools (TLDS) and any other local or international institutions or organisations seemed acceptable under this Policy

Charitable activities/ Programmes/ Appeals

This refers to the activities TF undertakes in line with its Constitution, Mission and Vision for the public benefit of its declared beneficiaries

Charitable activities can be incepted/delivered in conjunction with partners and include all activities undertaken by the parties together in order to support the charitable objectives of TF

5- Policy principles

In delivering to its objectives and in relation to donor management, the Foundation will:

- Facilitate donors to assist in charitable activity in a manner that is positive and an enriching through compliant gift giving*
- Provide donors with clarity about what the donation process entails and about the end use of funds*
- Undertake donor and donation due diligence in line with regulatory requirements*
- Accept donations which are legal, compliant and within the eligibility criteria of this Policy*
- Return donations when they are outside of the eligibility criteria of this Policy*
- Account fairly and transparently the value of each donation*
- Undertake monitoring of charitable funds from donation to the end use of funds*

³ [Chapter 2: Due diligence, monitoring and verifying the end use of charitable funds \(publishing.service.gov.uk\)](#)

⁴ See ANNEX 7 for further details

- h) Undertake due diligence on partners with which TF collaborates in the execution of agreed charitable activities*
- i) Maintain financial records for both the receipt and use of all funds together with audit trails of decisions made*
- j) Record both domestic and international transactions with sufficient detail to verify that funds have been spent properly as intended and in a manner consistent with the purpose and objectives of the TF*
- k) Provide recognition to donors which contribute to TF in line with this Policy*
- l) Safeguard all donor information in line with this Policy*
- m) Fulfil any obligations under UK or international law regarding the reporting of suspicious terrorist or criminal activity in relation to charitable donations*

6- Donor assistance

The Foundation can offer technical assistance to all donors who would like to:

- donate to the Foundation generally as part of unrestricted funds
- donate to an existing Programme or cause
- establish a new appeal

Technical assistance include:

- Provision to the donor of an overview of the process
- Support in creating the required legal documentation to support the donation if required
- Access to evidentiary information where required by the donor of the work undertaken by the TF

7- Acceptance

The Foundation will only accept donations which within the eligibility criteria as set out below. In general, an acceptable donation must:

- Be legal and compliant with all applicable rules and regulations
- Come to TF by means of acceptable fundraising
- Be from a legitimate source that can be independently checked
- Pass the due diligence as described in the Policy without any reservations
- If accepted, be able to allow reasonable levels of monitoring
- If accepted, be able to allow reasonable levels of end use verification
- If accepted, be applied as intended if conditions are imposed on the donations

Acceptable donations can include:

Small and regular donations

TF will accept the small, and/or anonymous, and or regular donations that comply with relevant conditions above which include:

- Small amounts of money as a one off donation, by cheque, bank transfer or cash
- From fundraising events in public cash collections and through charity boxes
- Individuals and organisations regular donations through direct debits

Large donations / substantial donations

TF will accept large donations that comply with relevant conditions above provided which include:

- Gifts as per the TF/TLDS Memorandum of Understanding

- Gifts over the tax relievable limit of £25,000 or more in a 12 month period, or £150,000 or more in a period of 6 years from a particular donor

Legacies and wills

TF will accept legacies and wills that comply with relevant conditions above provided it can ensure the good receipt from the executor of the will and receive a copy of the will from the Probate Service

Acceptance of high risk donations

Where a donation has been assessed to be high risk via the due diligence and Know Your Donor (KYD) process, Trustees will need to provide acceptance approval in writing

8- Risk based due diligence and Know Your Donor (KYD)

Due diligence is the range of practical steps under the Know your Donor regime that need to be taken in order to be assured of the provenance of charitable funds and to identify and manage associated risks.

The Foundation will undertake a Know Your Donor by putting effective risk based processes in place to:

- Document the identity of donors, particularly substantial donors (people or institutions)
- Undertake identity verification where it is reasonable and necessary to do so
- Understand what the organisation's or individual's business is to determine if this is appropriate for TF to be involved with
- Trace to the degree reasonably possible the origin of the charitable funds

The TF will undertake the due diligence in a risk based manner which means that each donation will be risk assessed and the Know Your Donor process be administered in line with the perceived risk in a manner that is commensurate and appropriate to the size, origin and intended use of the funds⁵

9- Refusal of a donation

As a rule, TF will accept all donations in line with section 7

However, TF can refuse a donation if it has reasonable grounds⁶ to believe any of the below:

- The donation is not provided for the furtherance of TF's mission and objectives
- There is a risk which cannot be mitigated that the donation is used for/came from:
 - o Money laundering
 - o Acceptance of proceeds of crime
 - o Tax avoidance/evasion
 - o Fraud
- The due diligence could not be completed and/or could not sufficiently establish all required information
- In general, if any of the conditions of acceptability in section 7 are not present, or it is suspected they may not be present in the foreseeable future

⁵ See ANNEX 1 for more detail

⁶ Reasonable grounds: TF believes it is the case in the balance of probability. This threshold is below beyond all reasonable doubt

- If there is an unacceptable level of reputational risk associated with the acceptance of a donation as perceived by the Trustees of the Board
- The donor is on a Sanctions list and/or the donation has been transferred to TF through a sanctioned institution
- Gifts made by vulnerable donors or made without due regard to the needs of others⁷

When conditions of unacceptability have been identified in relation to a donor, TF will no longer accept donations until it can be reasonably verified that circumstances of concern no longer exist

10- Return of a donation

As a rule, TF will attempt to avoid the return of accepted donations

However, if after the donation has been accepted and new information/ circumstance arise that cast doubt on the acceptability of a donation, TF can return it if it has reasonable grounds⁸ to believe that it has become no longer acceptable given any of the below:

- The donation is not provided for the furtherance of TF's mission and objectives
- There is a risk which cannot be mitigated that the donation is used for/came from:
 - Money laundering
 - Acceptance of proceeds of crime
 - Tax avoidance/evasion
 - Fraud
- New information contradict the due diligence with a favourable result
- In general, if any of the conditions of acceptability in section 7 is no longer present, or it is suspected they may not be present in the foreseeable future
- If there is an unacceptable level of reputational risk associated with the acceptance of a donation as perceived by the Trustees of the Board
- The donor is included in a Sanctions list and/or the donation has been transferred to TF through a sanctioned institution
- Gifts made by vulnerable donors or made without due regard to the needs of others⁹

TF can return donations:

- In full or in part
- From restricted or unrestricted funds
- Partially applied

When conditions of unacceptability have been identified in relation to a donation that has been applied, TF cannot use other funds to return it. In this situation, TF can consider:

-
- Disclosure of the situation to CC for advice

⁷ See ANNEX 1 for conditions of vulnerability

⁸ Reasonable grounds: TF believes it is the case in the balance of probability. This threshold is below beyond all reasonable doubt

⁹ See ANNEX 1 for conditions of vulnerability

- Disclosure publicly or otherwise to stakeholder and /or affected parties of the situation including the CC
- Evaluation of the impact of the donation to ensure the end benefit is in line with TF's objectives and obligations
- Evaluation that the handling of the donation once within TF took place in line with internal Policies and Procedures
- Execution of a root cause analysis and lessons learnt to avoid similar situations in the future

When conditions of unacceptability have been identified in relation to a donor, TF will no longer accept donations until it can be reasonably verified that circumstances of concern no longer exist

TF will not return donations to donors on donor request once they have been accepted under any circumstances

11- Expression of wish and donation conditions

Donors can make an expression of wish or apply conditions to a gift in relation to:

- Who the beneficiaries of the donation may be, and/or
- What programme the donation is intended to go, and /or
- How the funds must be drawdown or applied

It is TF's right to accept or reject a donation where an expression of wish and conditions have been attached as per sections 7/8/9 of this Policy

Acceptance of an expression of wish and/or conditions mean that TF will:

- Keep to the terms of the wish/conditions on a best endeavours basis
- Manage the funds on a segregated manner as part of "restricted pots"¹⁰
- Monitor the funds as per section 11 of this Policy
- Undertake a verification of the end use of a donation as per this section

If in the course of managing restricted pots, TF finds that all conditions cannot be met and/or circumstances have changed such that the expression of wish cannot be fully or partially met, TF will:

- Use the expression of wish as guidance to manage the funds as closely as originally intended
- Attempt to contact the donor to provide details on the new use of the donation

12- Monitoring

TF will undertake the monitoring of all funds accepted on a risk basis

Monitoring is the process by which the charity's funds can be accounted for so that there is an audit trail showing the application of the funds to the charitable cause as it was intended or as per agreed conditions

TF will:

¹⁰ See ANNEX 2 for further information

- Allocate funds to “restricted pots” if conditions of the donation required TF to do so¹¹
- Undertake its internal accounting in a manner that the use of “restricted pots”¹² is transparent overtime
- Keep a record of the expenditure of funds by TF
- Undertake checks that the funds were received by the intended beneficiary where applicable
- Undertake checks that the funds were received by the intended partner where applicable (e.g. CAIRN)
- Undertake audits to confirm that the charitable activities were delivered as expected
- Confirm that the charity's funds have been used for the purposes for which they were intended and for the beneficiaries identified

TF will also:

- Monitor the completion of all charitable activities and the expenses incurred to do so
- Assess the impact and value of each project and charitable work
- Review whether the charity's funds were being put to their most effective use

13- Verification of end use of a donation

TF will undertake a risk based verification of the end use of a donation

TF will:

- Document an audit trail for the movement of funds from the charity to the beneficiary
- Keep evidential proper records (e.g. receipts and invoices, transfer notices,...) to show how TF applied the funds on legitimate goods and services
- Request appropriate reporting to support the effective application of the funds for the benefit of the intended beneficiary in relation to programmes or appeals managed with or through partners/volunteers
- Verify accurate reports that enable effective control and oversight of the use of its resources. Reports to be linked to key aspects of the charitable cause, including:
 - funding tranches
 - project milestones
 - deliverables
 - project completion
 - beneficiary feedback
 - whether the conditions of the gift were met in the execution of the project
 - identify of beneficiaries

14- Assessment of acceptable partners and Know Your Partner (KYP)

Some of the donations will go to fund charitable activities which are executed with the help of partners.

In these situations, TF has an obligation to undertake due diligence to assess the risks posed by the partner in relation to the ability of TF to execute the provision of this Policy and to remain compliant with CC regulations

Due diligence is the range of practical steps under the Know your Partner regime that need to be taken in order to be assured that partners to TF are able to execute charitable activities in partnership

¹¹ If donations are provided without conditions or without an explicit expression of wish, then TF will automatically record the funds to an “unrestricted pot”

¹² See ANNEX 2 for more details

that permit TF to execute the provisions of this Policy and manage the risk of money laundering, terrorism financing and avoid the acceptance of proceeds of crime

The Foundation will undertake a Know Your Partner¹³ due diligence by putting effective risk based processes in place to:

- Document the identity of all partners
- Undertake identity verification of key individuals associated to approved partners where it is reasonable and necessary to do so
- Understand the objectives and agenda of the organisation to determine if this is appropriate for TF to be involved with
- Evaluate the risk posed by the partner to the TF in relation to financial crime and fraud

The TF will undertake the due diligence in a risk based manner which means that each partner will be risk assessed and the Know Your Partner process be administered in line with the perceived risk in a manner that is commensurate and appropriate to the intended charitable activity and use of the funds

Acceptance of high risk partners

Where a partner has been assessed to be high risk via the due diligence and Know Your Partner (KYP) process, Trustees will need to provide acceptance approval in writing

15 Donation valuation and record keeping

TF will account fairly and transparently the value of each donation, to this effect, TF will:

- Manage its accounts through FRS method¹⁴
- Independently audit its accounts
- Keep a record of valuation assumptions when these are needed

TF will keep records and required supporting evidence at a minimum for the mandatory statutory period of 7 years in general, and 7 years after the closure of an appeal and/or a programme

TF reserves the right to retain a portion of every donation for reasonable internal expenses and in reserve as per the Reserve Policy. Carve outs will be recorded accordingly and submitted to the scrutiny of the independent auditor

16- Donor communication

There is no legal requirement to proactively communicate with donors, against each donation made or for each project/programme/appeal, unless a gift or grant is subject to reporting conditions and TF has agreed to do this

However, TF will made available some form of reporting on the charity's work to its donors on request

17- Recognition

TF is grateful for all contributions big and small provided to its charitable activities. The gift of donors make the TF's work possible and all contributions must be celebrated in a way that is acceptable to donors

¹³ See ANNEX 7 for further detail

¹⁴ Accounting and Reporting by Charities: Statement of Recommended Practice applicable to charities preparing their accounts in accordance with the Financial /Reporting Standard applicable in the UK and Republic of Ireland / FRS 102

Private recognition

TF can identify ways to express appreciation to those donors who prefer a private recognition of their contribution. Unless otherwise agreed, donor contribution would be recognised privately primarily

Public recognition

TF can offer public recognition to donors by agreement with the Board of Trustees to those contributors to major fund raising efforts on a case by case basis.

All public recognition will be undertaken with the agreement of the donor and in line with GDPR requirements

18- Reporting of suspicious donations

If TF identifies suspicious donations¹⁵, the provisions of the Guidance as per below will be considered in relation to thresholds for reporting in relation to serious incidents¹⁶

The Trustees will judge if the suspicions are serious and if necessary report the matter to the police and/or other appropriate authorities as well as to the Charity Commission via RSI@charitycommission.gsi.gov.uk.

Suspicious circumstances include all those where the logic of the donation does not reasonably match the size, circumstances and conditions of a gift

TF will report all those that fall under the serious incident reporting regime and at a minimum situation where:

- Donations totalling £25,000 or more (one or many connected transactions) cannot be verified
- Individuals may be raising funds in the charity's name that never reach the charity, or where only some of the money is passed on

19- Overseas projects

Given the international focus of some of TF's charitable activities and the additional regulatory requirements which apply, TF will undertake dedicated due diligence, monitoring and verification of the end use of donations which are destined for CAIRN related projects in line with:

- Applicable provision in charity law
- The requirements of HMRC
- The Finance Act 2010
- In compliance with local customs, local protocols and national law

TF will fulfil any obligations under UK or international law regarding the reporting of suspicious terrorist or criminal activity in line with terrorist financing in S.19 Alert TACT 2000

TF will fulfil its obligations under The Finance Act 2010 states that charities "expenditure overseas could be considered non-charitable and therefore liable for tax if organisations do not take the steps HMRC considers are reasonable to ensure that the funds were used for charitable purposes"

¹⁵ See ANNEX 3 and [Chapter 2: Due diligence, monitoring and verifying the end use of charitable funds \(publishing.service.gov.uk\)](#)

¹⁶ See ANNEX 3 for further detail

20- Safeguarding and data privacy. Confidentiality and non-disclosure

TF applies its safekeeping obligations to all data in relation to donor, donations and payments methods used in the transfer of funds

The Foundation operates under the General Data Protection Regulation (GDPR) regime and will:

- Protect the personal information in accordance with GDPR
- Hold securely protected data
- Provide access to data by authorised personnel in accordance with GDPR and our Data privacy policies

Volunteers and partners are expected to manage protected donor related data they come across in the same manner and following the applicable TF's data related Policy

Donors are also likely to become aware of some confidential information about the Foundation itself, other volunteers, children and some young people supported by the charity and our partners. All donors are required to maintain confidentiality and should not disclose the charity's information during their association with TF and any time afterwards

21- Conflicts of interest

The Foundation operates a Conflicts of Interest policy which applies to donors and partners

If the TF becomes aware of conflicts or potential conflicts arise in the course of their association with a donor or partner, TF will apply the provisions of the Conflicts of Interest Policy

22- Feedback and conflict resolution

The Foundation is based on strong positive values of kindness and collaboration with all stakeholders and its donor community

However, we recognise that donors at times may be exposed to unexpected experiences, they may want to share feedback or raise concerns about an issue with a member of staff or a Trustee.

In that case, the Foundation will:

- make every reasonable effort to resolve difficulties at an early stage and we always review feedback and learn from it
- ensure that conflict resolution is done fairly, amicably and openly

Donors should:

- Approach the Executive Director first
- Escalate to the Board of Trustees if resolution of the issue is not forthcoming
-

23-Roles and responsibilities

The Risk and Finance Sub-Committee will:

- a) *Support the Board in managing the provisions of this Policy*

The Board of Trustees will:

- a) *Oversee the correct execution of this Policy*
- b) *Accept or reject donations classified by the KYD process as high risk*
- c) *Accept or reject partners classified by the KYP process as high risk*
- d) *Take the final view over donation acceptance queries when they have been escalated by the Executive Director*
- e) *Take the final view over donation rejection queries when they have been escalated by the Executive Director*
- f) *Take the final view over donation return queries when they have been escalated by the Executive Director*
- g) *Take the final view over the reporting of a suspicious donation*
- h) *Oversee the use of “restricted pots”*

The Executive Director will:

- i) *Execute the provisions of this Policy aided by its Office and volunteers as necessary*
- j) *Undertake donor management activities overall*
- k) *Undertake KYD*
- l) *Undertake KYP*
- m) *Undertake monitoring and verification of end use of a donation*
- n) *Report to the Board of Trustees as required*
- o) *Escalate issues of the Board of trustees as required*
- p) *Execute donor recognition plans as agreed with the donors*
- q) *Provide technical assistance to donors where required*
- r) *Manage TF’s accountant*
- s) *Request independent audit of the accounts*
- t) *Set up and manage “restricted pots”*
- u) *Manage funds in line with donor conditions*

The Executive Director’s Office and designated volunteers can:

- v) *Assist the Executive Director in the execution of this Policy*
- w) *Undertake steps required in relation to due diligence, monitoring and verification of end use*
- x) *Raise conflicts of interest if any arises in the course of the undertaken donor related activities*
- y) *Design donor recognition programmes*
- z) *Undertake donor communications*

TF accountants will:

- a) *Enact this Policy in relation to the accounts of TF*

24- Monitoring and Review

The Policy shall be monitored, reviewed and updated by the Trustees once a year. Compliance with this Policy shall be monitored by the Chair, and appropriate action taken when necessary.

25- Awareness and training requirements

All volunteers, designated or otherwise and paid staff of TF are requested to consult the applicable CC guidance by accessing the publicly available resources at:

[Charities: due diligence, monitoring and verifying the end use of charitable funds - GOV.UK](https://www.gov.uk/guidance/charities-due-diligence-monitoring-and-verifying-the-end-use-of-charitable-funds)
(www.gov.uk)

26- Date of last review of policy

Date of last review: May 2022

Approval by the Board of Trustees: June 14,2022

ANNEX

ANNEX 1- Know Your Donor (KYD) guide

TF undertakes a risk based approach due diligence by following two steps:

- Step 1 – Initial determination of donor/donation risk
- Step 2- Determination of required due diligence
- Step 3- Determination of donation acceptability

Step 1- Determination of donor / donation risk

TF will determine the risk of a donor or a donation by undertaking some fact finding aided by the Charity Commission (CC) “Know your donor, key questions” in the CC toolkit¹⁷

TABLE 1a- DETERMINATION OF THE DONOR RISK (corporate donor)			
	HIGH RISK	MEDIUM RISK	LOW RISK
Country of incorporation	Outside UK/EU	In EU	In UK
Country of residence of UBO/s	Outside UK/EU	In EU	In UK
Country of residence of Director/s	Outside UK/EU	In EU	In UK
Country of residence of Controllers	Outside UK/EU	In EU	In UK
Business object	As per Business Object List A ¹⁸	As per Business Object List B	As per Business Object List A
Nature of the donation	Multiple	Single	One-off
Size of the donation	Unjustifiably large or Above £25,000	Large	Small
Currency	Other currencies	Euro / Dollar	UK sterling
Conditional donation	With unjustifiable conditions	With conditions	Without conditions
Origin of the funds	Unknown and lack of evidence for business success	Unclear but successful business	Known: successful business

¹⁷ [Tool 6.pdf \(publishing.service.gov.uk\)](#)

¹⁸ See ANNEX 4 for details

TABLE 1b- DETERMINATION OF THE DONOR RISK (personal donor)			
	HIGH RISK	MEDIUM RISK	LOW RISK
Country of nationality	Outside UK/EU	In EU	In UK
Country of residence	Outside UK/EU	In EU	In UK
Nature of the donation	Multiple	Single	One-off
Size of the donation	Unjustifiably large	Large	Small
Currency	Other currencies	Euro / Dollar	UK sterling
Conditional donation	With unjustifiable conditions	With conditions	Without conditions
Origin of the funds	Unknown	Unclear	Known

Step 2: Determination of required due diligence

TF will undertake a risk based due diligence as follows

STEP 2: DETERMINATION OF WHAT LEVEL OF DUE DILIGENCE			
	HIGH RISK CLIENT	MEDIUM RISK CLIENT	LOW RISK CLIENT
Level of due diligence	Enhanced due diligence	Standard due diligence	Common sense check ¹⁹

TF will use the following as guidance as to what evidentiary proof is needed to satisfy KYD due diligence

¹⁹ Common sense checks can be carried out to establish the basic facts of a donor and donation and to check legitimacy of the donation in line with acceptability criteria where there is no or low identified risk arising from the donor/donation. This Policy leaves the checks to the discretion of the Executive Director

KNOW YOUR DONOR-DUE DILIGENCE GUIDE

(Corporate donor)

	CORPORATE ENTITIES (exc charities and trusts)	PARTNERSHIPS	CHARITIES AND TRUSTS
STANDARD DUE DILIGENCE			
Identity	Legal name as per relevant companies Register	Legal name as per relevant companies Register Surname	Name and Surname
Registered number	Legal relevant number	Legal relevant number	Legal relevant number
Date of incorporation	Date	Date	Date
Registered office in the country of incorporation	Address	Address	Address
Principal business address	Address	Address	Address
Key individuals	List of UBOs List of Controllers ²⁰ List of Directors Plus Supporting documentation from list of acceptable documents for ID&V for UBOs only Plus	List of general partners List of limited partners (threshold-15% stake) Name of CEO and key controller ²¹ Plus Supporting documentation from list of acceptable	List of Trustees Name of CEO and key controller ²³ Plus Supporting documentation from list of acceptable documents for ID&V for trustees Plus

²⁰ Donors must declare as a controller the individual who has authority to act on behalf of the donor

²¹ As per above

²³ As per above

	<p>Supporting documentation from list of acceptable documents for ID&V for the CEO</p> <p>Plus</p> <p>A copy of the company's Certificate of Incorporation or equivalent</p>	<p>documents for ID&V for general partners</p> <p>Plus</p> <p>Supporting documentation from list of acceptable documents for ID&V for the CEO and key controller²²</p> <p>Plus</p> <p>A copy of the company's Certificate of Incorporation or equivalent</p>	<p>Supporting documentation from list of acceptable documents for ID&V for the CEO and key controller²⁴</p> <p>Plus</p> <p>A copy of the company's Certificate of Incorporation or equivalent</p>
Lists (data to contain)	<p>Name and surname</p> <p>Month and year of birth</p> <p>Nationality</p> <p>Country of residence</p>	<p>Name and surname</p> <p>Month and year of birth</p> <p>Nationality</p> <p>Country of residence</p>	<p>Name and surname</p> <p>Month and year of birth</p> <p>Nationality</p> <p>Country of residence</p>
Sanctions check	NA	NA	NA
Source of funds	NA	NA	NA
Adverse media check	NA	NA	NA
PEP check	NA	NA	NA

²² Key controller: the controller the individual who has authority to act on behalf of the donor. This may be the same person of the CEO or somebody else in the management of the firm

²⁴ Key controller: the controller the individual who has authority to act on behalf of the donor. This may be the same person of the CEO or somebody else in the management of the firm

ENHANCED DUE DILIGENCE			
Identity	Required as per above	Required as per above	Required as per above
Date of birth	Required as per above	Required as per above	Required as per above
Nationality	Required as per above	Required as per above	Required as per above
Residence	Required as per above	Required as per above	Required as per above
Identifier	Required as per above	Required as per above	Required as per above
ID&V required	Required as per above Plus Supporting documentation from list of acceptable documents for ID&V for all Controllers and Directors	Information provided in the FORM Plus Supporting documentation from list of acceptable documents for ID&V for all limited partners	Information provided in the FORM Plus Supporting documentation from list of acceptable documents for ID&V for all trustees
Collection of evidentiary documentation	Required from list of acceptable documents	Required from list of acceptable documents	Required from list of acceptable documents
Source of funds check	Required as per section below	Required as per section below	Required as per section below
Sanctions check	Required as per section below	Required as per section below	Required as per section below
Adverse media check	Required as per section below	Required as per section below	Required as per section below
PEP check	Required as per section below	Required as per section below	Required as per section below
Sufficient information	The principle of sufficient information applies to the KYD reviews		

KNOW YOUR DONOR-DUE DILIGENCE GUIDE

(individual donor/ or key people in corporate donors)

	INDIVIDUAL DONOR	UBO of corporate donor	DIRECTORS of corporate donor	CONTROLLERS of corporate donor
STANDARD DUE DILIGENCE				
Identity	Name and Surname	Name and Surname	Name and Surname	Name and Surname
Date of birth	Month and year	Month and year	Month and year	Month and year
Nationality	Nationality	Nationality	Nationality	Nationality
Residence	Address	Address	Address	Address
Identifier	NA	% ownership of company above 10%	If in Companies House or relevant body if incorporated outside UK	Rationale for significant control At a minimum TF will require the information in relation to the CEO of each practice
ID&V required	Information provided in the LIST Plus Supporting documentation from list of acceptable documents for ID&V	Information provided in the LIST Plus Supporting documentation from list of acceptable documents for ID&V	Information provided in the LIST ID&V completed by checks against Companies House	Information provided in the LIST
Collection of evidentiary documentation	Required from list of acceptable documents	Required from list of acceptable documents	Not required	Not required
Sanctions check	NA	NA	NA	NA
Adverse media check	NA	NA	NA	NA
PEP check	NA	NA	NA	NA

ENHANCED DUE DILIGENCE				
Identity	Name and Surname	Required as per above	Required as per above	Required as per above
Date of birth	Month and year	Required as per above	Required as per above	Required as per above
Nationality	Nationality	Required as per above	Required as per above	Required as per above
Residence	Address	Required as per above	Required as per above	Required as per above
Identifier	NA	Required as per above	Required as per above	Required as per above
ID&V required	Information provided in the LIST Plus Supporting documentation from list of acceptable documents for ID&V	Information provided in the FORM Plus Supporting documentation from list of acceptable documents for ID&V	Information provided in the FORM Plus Supporting documentation from list of acceptable documents for ID&V	Information provided in the FORM Plus Supporting documentation from list of acceptable documents for ID&V
Collection of evidentiary documentation	Required from list of acceptable documents	Required from list of acceptable documents	Required from list of acceptable documents	Required from list of acceptable documents
Sanctions check	Required as per section below	Required as per section below	Required as per section below	Required as per section below
Adverse media check	Required as per section below	Required as per section below	Required as per section below	Required as per section below
PEP check	Required as per section below	Required as per section below	Required as per section below	Required as per section below
Sufficient information	The principle of sufficient information applies to the KYC reviews			

PEP checks

PEP checks aim to identify donors which are Politically Exposed Persons

Sanction Checks

The following data points will be screened for Sanction:

-Corporate donor: official company name

-Key individuals- Individual donor /UBOs / Directors/ Controllers as follows:

- Name (name and surname)
- Month and year of birth
- Nationality
- Country of residence (address)

-Key individuals- Partners/Trustees as follows:

- Name (name and surname)
- Month and year of birth
- Nationality
- Country of residence (address)

Adverse media

The following data points will be screened for adverse media related hits:

-Donor: official company name

-Key individuals: UBOs / Directors/ Controllers as follows:

- Name (name and surname)

-Key individuals- Partners/Trustees as follows:

- Name (name and surname)

Adverse media is defined as any reference in acceptable media sources of reports of activities in relation to financial crime and fraud which are recent (last 3 years)

Adverse media will be confirmed if it refers to reports that confirms the presence of such financial crime or fraud related activity by means of a sentence or any other judicial or regulatory activity such as warning, formal warnings, confirm sentences and any other report that can reasonably be interpreted to hold a level of formal and independent assessment that financial crime was suspected or existed

ID&V

Identification- establishing the facts in relation to a customer, UBO and controllers through a primary source. This is done documentarily by the provisioning of docs which proof identity, address, etc. from a list of acceptable documents

Verification-checking that primary documents used for identification are consistent with other independent and authoritative sources which helps provide consistent evidence for the facts collect during identification

Certification of primary sources of identification may be used as a means to undertake verification

For TF, ID&V refers to checks done of the corporate entity as well as relevant individuals²⁵ which include the directors²⁶, controllers²⁷ and UBOS²⁸ as per the tables of the technical requirement sections above

Source of funds

The donors must demonstrate that they are managing a legitimate and viable business which is commensurate with their accounts and the funds that will be managed through TF's payment methods

TF will require the provision of 3 year's audited accounts to establish source of funds

Failing this, TF will require any other internal paperwork which may demonstrate the number of pets and health care related services that are being provided to support the origin of their funds

List of acceptable documentation

- Copy of valid passport showing all four corners, clear photograph, date of issue, date of expiry and specimen signature
- National identity card showing clear photograph, date of issue, date of expiry and specimen signature
- Drivers licence showing clear photograph, date of issue, date of expiry and specimen signature;
- Confirmation from a reputable law firm or accountancy firm that they have verified the identity of the UBO/Trustee/Partner/Controller/Director
- Confirmation of active approved persons status from the FCA's website (<https://register.fca.org.uk>) and taking a screen print;
- Confirmation of active licensed/approved person status UK equivalent regulator and taking a screen print
- Companies House Register or country equivalent
- Charities Commission Register or country equivalent
- Mortgage deed
- Drivers licence showing clear photograph, date of issue, date of expiry and specimen signature
- Confirmation from a reputable law firm or accountancy firm that they have verified the identity of the principal(s)
- Current driver's licence if not used to verify the identity of the individual
- Utility bill issued within the last 3 months (mobile phone bills may not be used)
- Bank, building society, credit card or other financial institution statement issued within the last 3 months by a financial institution
- Official government document or letter such as a tax document issued within the last 6 months
- Three years' worth of annual accounts to support source of funds due diligence
- Any other internal paperwork that can be independently checked to demonstrate source of funds

Step 3: Determination of donation acceptability

²⁵ Key individuals include trustees and partners depending on corporate organisation type of the Donor

²⁶ Directors- individuals identified as directors in Companies House or if incorporated in another country, the relevant official register

²⁷ Controllers- individuals It includes people who are responsible for a significant segment or activity of the company i.e. Chairman of the board, CFO, CEO, COO and also includes individuals who may not be in senior management positions but who can exercise control and/persuasion over significant proportions of primary business activities

²⁸ UBOS- ultimate beneficiary owner of an organisation

Once the KYD due diligence has been completed, TF needs to confirm the acceptability of the donor/donation against the criteria of section 7/ 9 and 10

ANNEX 2- Restricted and unrestricted pots

TF will manage funds in “pots”, which refer to segregated accounts in relation to the intended use of the donations

Restricted pots: This refer to funds which have been given under conditions that the TF has accepted. They are managed under the provision of section 11 of this Policy

Unrestricted pots: refers to funds given and managed unconditionally by the TF for the furtherance of its objectives and its intended beneficiaries

ANNEX 3- Serious incident

In relation to suspicious donations, Trustees will take regard to the thresholds which identify a “serious incident”

A serious incident is an adverse event, whether actual or alleged, which results in or risks significant:

- loss of a charity’s money or assets
- damage to a charity’s property
- harm to a charity’s work, beneficiaries or reputation

As the charity’s income is over £25,000, the trustees as part of the Annual Return sign a declaration confirming there were no serious incidents during the previous financial year that should have been reported to the Commission but were not.

If incidents did occur, but weren’t reported at the time, the trustees will submit these before they file their charity’s Annual Return, so they can make the declaration. Until all serious incidents have been reported, the trustees will not be able to make this declaration, or complete the Annual Return, which is a statutory requirement under section 169 of the Charities Act 2011

ANNEX 4- Business object lists

Prohibited businesses

TF will not accept donations where it can trace the source to individuals or organisations linked to:

Companies with Bearer Shares

Shell Companies

Adult Entertainment

Unregulated Charities and Other Unregulated “Not for Profit” Organisations

Arms Trade

Gambling

Virtual currencies

Correspondent banking

Marijuana plant production

Terrorism

Sanctions

Business objective list A-High risk industries

Money Services Businesses

Precious Metals/Gems

Real Estate and Property Development

Energy, including gas and oil

Public Works Contracts

Construction

Mining

Industrial Goods Sector, including the manufacture and production of goods used in:

Aerospace and Defence

Industrial Machinery

Lumber Production

Construction

Cement and Metal Fabrication

Business objective list B- Medium risk industries
All other not considered in A or C lists

Business objective list C-Low risk
Regulated industries such as financial services sector

Other regulated charities in the UK

Industries connected with education

ANNEX 5- Know Your Partner (KYP) guide

TF undertakes a risk based approach due diligence by following two steps:

- Step 1 – Initial determination of partner risk
- Step 2- Determination of required due diligence
- Step 3- Determination of partner acceptability

Step 1- Determination of partner risk

TF will determine the risk of a partner by undertaking some fact finding aided by the Charity Commission (CC) “Know your partner, key questions” in the CC toolkit²⁹

	HIGH RISK	MEDIUM RISK	LOW RISK
Institution type	Unregulated	Regulated outside UK	Regulated in the UK
Organisational structure	Trust Partnership Unregulated charity Special purpose Vehicles (SPV) LLC/LP/LLP	Private companies	Listed company
Country of incorporation	Outside UK/EU	In EU	In UK
Country of residence of representatives (as relevant)	Outside UK/EU	In EU	In UK
Country of residence of UBO/s (as relevant)	Outside UK/EU	In EU	In UK
Country of residence of Director/s (as relevant)	Outside UK/EU	In EU	In UK
Country of residence of Controllers (as relevant)	Outside UK/EU	In EU	In UK
Business object (as relevant)	As per Business Object List A ³¹	As per Business Object List B	As per Business Object List A
Internal systems and controls	Not known / unverifiable	In line with regulated entities by charity Commission but no CIO	In line with regulated entities / regulated charities which are CIOs
PEP	If PEP	NA	If PEP status not identified

²⁹ [Tool 8.pdf \(publishing.service.gov.uk\)](#)

³⁰ Refer to ANNEX 7 for details on key individuals

³¹ See ANNEX 4 for details

Adverse media	If identified	NA	If not identified
Sanction	If identified, then partner is not acceptable for TF	NA	If not identified
TABLE 1b- DETERMINATION OF THE PARTNER RISK (key individual as relevant)			
	HIGH RISK	MEDIUM RISK	LOW RISK
Country of nationality	Outside UK/EU	In EU	In UK
Country of residence	Outside UK/EU	In EU	In UK
PEP	If PEP	NA	If PEP status not identified
Adverse media	If identified	NA	If not identified
Sanction	If identified, then partner is not acceptable for TF	NA	If not identified

Step 2: Determination of required due diligence

TF will undertake a risk based due diligence as follows

STEP 2: DETERMINATION OF WHAT LEVEL OF DUE DILIGENCE			
	HIGH RISK CLIENT	MEDIUM RISK CLIENT	LOW RISK CLIENT
Level of due diligence	Enhanced due diligence	Standard due diligence	Common sense check ³²

TF will use the following as guidance as to what evidentiary proof is needed to satisfy KYP due diligence

KNOW YOU PARTNER-DUE DILIGENCE GUIDE			
	CORPORATE ENTITIES (exc charities and trusts)	PARTNERSHIPS	CHARITIES AND TRUSTS
STANDARD DUE DILIGENCE			

³² Common sense checks can be carried out to establish the basic facts of a donor and donation and to check legitimacy of the donation in line with acceptability criteria where there is no or low identified risk arising from the donor/donation. This Policy leaves the checks to the discretion of the Executive Director

Identity	Legal name as per relevant companies Register	Legal name as per relevant companies Register Surname	Name and Surname
Registered number	Legal relevant number	Legal relevant number	Legal relevant number
Date of incorporation	Date	Date	Date
Registered office in the country of incorporation	Address	Address	Address
Principal business address	Address	Address	Address
Key individuals	List of UBOs List of Controllers ³³ List of Directors Plus Supporting documentation from list of acceptable documents for ID&V for UBOs only Plus Supporting documentation from list of acceptable documents for ID&V for the CEO Plus	List of general partners List of limited partners (threshold-15% stake) Name of CEO and key controller ³⁴ Plus Supporting documentation from list of acceptable documents for ID&V for general partners Plus Supporting documentation from list of acceptable documents for ID&V	List of Trustees Name of CEO and key controller ³⁶ Plus Supporting documentation from list of acceptable documents for ID&V for trustees Plus Supporting documentation from list of acceptable documents for ID&V for the CEO and key controller ³⁷

³³ Donors must declare as a controller the individual who has authority to act on behalf of the donor

³⁴ As per above

³⁶ As per above

³⁷ Key controller: the controller the individual who has authority to act on behalf of the donor. This may be the same person of the CEO or somebody else in the management of the firm

	A copy of the company's Certificate of Incorporation or equivalent	for the CEO and key controller ³⁵ Plus A copy of the company's Certificate of Incorporation or equivalent	Plus A copy of the company's Certificate of Incorporation or equivalent
Lists (data to contain)	Name and surname Month and year of birth Nationality Country of residence	Name and surname Month and year of birth Nationality Country of residence	Name and surname Month and year of birth Nationality Country of residence
Sanctions check	NA	NA	NA
Source of funds	NA	NA	NA
Adverse media check	NA	NA	NA
PEP check	NA	NA	NA
ENHANCED DUE DILIGENCE			
Identity	Required as per above	Required as per above	Required as per above
Date of birth	Required as per above	Required as per above	Required as per above
Nationality	Required as per above	Required as per above	Required as per above
Residence	Required as per above	Required as per above	Required as per above
Identifier	Required as per above	Required as per above	Required as per above
ID&V required	Required as per above Plus	Information provided in the FORM	Information provided in the FORM

³⁵ Key controller: the controller the individual who has authority to act on behalf of the donor. This may be the same person of the CEO or somebody else in the management of the firm

	Supporting documentation from list of acceptable documents for ID&V for all Controllers and Directors	Plus Supporting documentation from list of acceptable documents for ID&V for all limited partners	Plus Supporting documentation from list of acceptable documents for ID&V for all trustees
Collection of evidentiary documentation	Required from list of acceptable documents	Required from list of acceptable documents	Required from list of acceptable documents
Source of funds check	Required as per section below	Required as per section below	Required as per section below
Sanctions check	Required as per section below	Required as per section below	Required as per section below
Adverse media check	Required as per section below	Required as per section below	Required as per section below
PEP check	Required as per section below	Required as per section below	Required as per section below
Sufficient information	The principle of sufficient information applies to the KYD reviews		

KNOW YOUR PARTNER- DUE DILIGENCE GUIDE (Key individuals)			
	UBO of corporate donor	DIRECTORS of corporate donor	CONTROLLERS of corporate donor
STANDARD DUE DILIGENCE			
Identity	Name and Surname	Name and Surname	Name and Surname
Date of birth	Month and year	Month and year	Month and year
Nationality	Nationality	Nationality	Nationality
Residence	Address	Address	Address
Identifier	% ownership of company above 10%	If in Companies House or relevant body if incorporated outside UK	Rationale for significant control At a minimum TF will require the information in relation to the CEO of each practice
ID&V required	Information provided in the LIST Plus	Information provided in the LIST	Information provided in the LIST

	Supporting documentation from list of acceptable documents for ID&V	ID&V completed by checks against Companies House	
Collection of evidentiary documentation	Required from list of acceptable documents	Not required	Not required
Sanctions check	NA	NA	NA
Adverse media check	NA	NA	NA
PEP check	NA	NA	NA
ENHANCED DUE DILIGENCE			
Identity	Required as per above	Required as per above	Required as per above
Date of birth	Required as per above	Required as per above	Required as per above
Nationality	Required as per above	Required as per above	Required as per above
Residence	Required as per above	Required as per above	Required as per above
Identifier	Required as per above	Required as per above	Required as per above
ID&V required	Information provided in the FORM Plus Supporting documentation from list of acceptable documents for ID&V	Information provided in the FORM Plus Supporting documentation from list of acceptable documents for ID&V	Information provided in the FORM Plus Supporting documentation from list of acceptable documents for ID&V
Collection of evidentiary documentation	Required from list of acceptable documents	Required from list of acceptable documents	Required from list of acceptable documents
Sanctions check	Required as per section below	Required as per section below	Required as per section below
Adverse media check	Required as per section below	Required as per section below	Required as per section below
PEP check	Required as per section below	Required as per section below	Required as per section below
The principle of sufficient information applies to the KYC reviews			

PEP checks

PEP checks aim to identify donors which are Politically Exposed Persons

Sanction Checks

The following data points will be screened for Sanction:

-Corporate partner: official company name

-Key individuals if corporate partners: UBOs / Directors/ Controllers as follows:

- Name (name and surname)
- Month and year of birth
- Nationality
- Country of residence (address)

-Key individuals if non corporates as relevant: Partners/Trustees as follows:

- Name (name and surname)
- Month and year of birth
- Nationality
- Country of residence (address)

Adverse media

The following data points will be screened for adverse media related hits:

-Partner: official company name

-Key individuals if corporate partner: UBOs / Directors/ Controllers as follows:

- Name (name and surname)

-Key individuals if non-corporate entity: Partners/Trustees as follows:

- Name (name and surname)

Adverse media is defined as any reference in acceptable media sources of reports of activities in relation to financial crime and fraud which are recent (last 3 years)

Adverse media will be confirmed if it refers to reports that confirms the presence of such financial crime or fraud related activity by means of a sentence or any other judicial or regulatory activity such as warning, formal warnings, confirm sentences and any other report that can reasonably be interpreted to hold a level of formal and independent assessment that financial crime was suspected or existed

ID&V

Identification- establishing the facts in relation to a partner, UBO and controllers through a primary source. This is done documentarily by the provisioning of docs which proof identity, address, etc. from a list of acceptable documents

Verification-checking that primary documents used for identification are consistent with other independent and authoritative sources which helps provide consistent evidence for the facts collect during identification

Certification of primary sources of identification may be used as a means to undertake verification

For TF, ID&V refers to checks done of the corporate entity as well as relevant individuals³⁸ which include the directors³⁹, controllers⁴⁰ and UBOS⁴¹ as per the tables of the technical requirement sections above

Source of funds

The donors must demonstrate that they are managing a legitimate and viable business which is commensurate with their accounts and the funds that will be managed through TF's payment methods

TF will require the provision of 3 year's audited accounts to establish source of funds

Failing this, TF will require any other internal paperwork which may demonstrate the number of pets and health care related services that are being provided to support the origin of their funds

List of acceptable documentation

- Copy of valid passport showing all four corners, clear photograph, date of issue, date of expiry and specimen signature
- National identity card showing clear photograph, date of issue, date of expiry and specimen signature
- Drivers licence showing clear photograph, date of issue, date of expiry and specimen signature;
- Confirmation from a reputable law firm or accountancy firm that they have verified the identity of the UBO/Trustee/Partner/Controller/Director
- Confirmation of active approved persons status from the FCA's website (<https://register.fca.org.uk>) and taking a screen print;
- Confirmation of active licensed/approved person status UK equivalent regulator and taking a screen print
- Companies House Register or country equivalent
- Charities Commission Register or country equivalent
- Mortgage deed
- Drivers licence showing clear photograph, date of issue, date of expiry and specimen signature
- Confirmation from a reputable law firm or accountancy firm that they have verified the identity of the principal(s)
- Current driver's licence if not used to verify the identity of the individual
- Utility bill issued within the last 3 months (mobile phone bills may not be used)
- Bank, building society, credit card or other financial institution statement issued within the last 3 months by a financial institution
- Official government document or letter such as a tax document issued within the last 6 months
- Three years' worth of annual accounts to support source of funds due diligence

³⁸ Key individuals include trustees and partners depending on corporate organisation/ type of the donor

³⁹ Directors- individuals identified as directors in Companies House or if incorporated in another country, the relevant official register

⁴⁰ Controllers- individuals It includes people who are responsible for a significant segment or activity of the company i.e. Chairman of the board, CFO, CEO, COO and also includes individuals who may not be in senior management positions but who can exercise control and/persuasion over significant proportions of primary business activities

⁴¹ UBOS- ultimate beneficiary owner of an organisation

- Any other internal paperwork that can be independently checked to demonstrate source of funds

Step 3: Determination of partner acceptability

Once the KYP due diligence has been completed, TF needs to confirm the acceptability of the partner against the criteria of section 7/ 9 and 10

In this sense, a partner can only be acceptable if a donation managed through a partner retain the attributes of an acceptable donation, for example, the donation can be monitored through the activities of the partner and a validation of end use undertaken

ANNEX 6- KYD- Know Your Donor key individuals

A donor can be a person or a corporate institution

TF undertakes a risk based approach due diligence in relation to all key individuals which are relevant to a donor differently in each case

Individual donors are subject to due diligence as per ANNEX 1




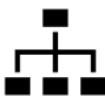
Corporate institutions are subject to due diligence as entities in their own right, however TF undertakes due diligence in relation to “key individuals” as follows:

TABLE 1- CORPORATE ENTITY

KNOW YOUR DONOR (KYD)

WHO ARE THE SUBJECT OF DUE DILIGENCE AND ID&V?

1. If the donor is a corporate entity, the entity and key individuals associated with the entity

INSTITUTION	KEY INDIVIDUALS ASSOCIATED TO KYD / KYP		
			
The due diligence checks:	UBOs Ultimate beneficiary owners of an organization	DIRECTORS of the corporate entity	CONTROLLERS of the corporate entity
<ol style="list-style-type: none"> 1. Whether it is a legitimate business 2. If it is a registered business 3. If the business exists 4. What type of corporate entity it is 5. If it has been sanctioned 6. If they hold a politically exposed status 7. If there is adverse media indicating suspended financial crime 	<p>Person/s who receive the profits of the institution</p>	<p>Individuals identified as directors in Companies House or if incorporated in another country, the relevant official register</p>	<p>Individuals who are responsible for a significant segment or activity of the company</p> <p>For TF, at a minimum the CEO and the person that has been identified to deal with TF from the organization</p>

THE SAME INDIVIDUAL MAY BE A UBO/ DIRECTOR /CONTROLLER AT THE SAME TIME

When the entity is a partnership, trust or another charity, then “key individuals” include UBOs,, general partners or trustees as relevant

ANNEX 7- KYP- Know Your Partner key individuals

A partner can only be an institution of some kind

TF undertakes a risk based approach due diligence in relation to all key individuals which are relevant to a partner differently in each case





Corporate institutions are subject to due diligence as entities in their own right, however TF undertakes due diligence in relation to “key individuals” as follows:

TABLE 1- CORPORATE ENTITY

KNOW YOUR PARTNER (KYP)

WHO ARE THE SUBJECT OF DUE DILIGENCE AND ID&V?

1. If the partner is a corporate entity, the entity and key individuals associated with the entity

INSTITUTION	KEY INDIVIDUALS ASSOCIATED TO KYD / KYP		
			
<p>The due diligence checks:</p> <ol style="list-style-type: none"> 1. Whether it is a legitimate business 2. If it is a registered business 3. If the business exists 4. What type of corporate entity it is 5. If it has been sanctioned 6. If they hold a politically exposed status 7. If there is adverse media indicating suspended financial crime 	<p>UBOs Ultimate beneficiary owners of an organization</p> <p>Person/s who receive the profits of the institution</p>	<p>DIRECTORS of the corporate entity</p> <p>Individuals identified as directors in Companies House or if incorporated in another country, the relevant official register</p>	<p>CONTROLLERS of the corporate entity</p> <p>Individuals who are responsible for a significant segment or activity of the company</p> <p>For TF, at a minimum the CEO and the person that has been identified to deal with TF from the organization</p>
<p>THE SAME INDIVIDUAL MAY BE A UBO/ DIRECTOR /CONTROLLER AT THE SAME TIME</p>			

When the partner is a partnership, trust or another charity, then “key individuals” include UBOs,, general partners or trustees as relevant