

## ANTI MONEY LAUNDERING POLICY

### Introduction

This document presents the policy outlining EWB-DK's commitment across the organization to implementing an approach to counter money laundering. The policy addresses specific actions, additional information on a wider understanding can be found in the code of conduct and similar documentation.

As a general guideline for all EWB-DK activities, the organization is committed to enforcing and adhering guidelines established by the Danish Business Authorities.

### Purpose

The purpose of this policy is to contribute positively to the promotion of good governance and transparency through EWB-DK's activities and projects while ensuring compliance with both Danish and international standards.

EWB-DK will under no circumstances receive or accept any forms of money laundering in connection with our activities in Denmark or abroad. EWB-DK has a zero-tolerance policy.

### Definition of Money Laundering

Money laundering is an attempt to conceal that income originates from a criminal act such as tax and VAT evasion, embezzlement, drug trafficking, fraud, extortion, theft, robbery, human or arms smuggling.

The purpose of money laundering is to make illegal proceeds from a criminal act appear as if they have been acquired legally.

### Specific Actions to and Counter Money Laundering

#### A. KYC – Know your customer

If our customer is a private individual; we note their name and strive to note their CPR number. If the customer does not have a Danish CPR number, we strive to ask for a date of birth.

If our customer is a company, the identity information must include the name and CVR number.

Possibly we will strive to make a contract or at least write down our agreement with the customer.

#### B. Control and Risk assessment

In general, we assess our donors by an overall and natural evaluation when they enter EWB-DK for the first time in terms of CRM (customer relation management).

Fundamentally, the level of risk for EWB-DK to be used for Money Laundering is the lowest. EWB-DK does not accept cash and does not participate in cashflows, which normally are used for Money Laundering, since EWB-DK is a NGO.

### **C. Research and Noting**

If we suspect - or have reasonable grounds to assume - that an activity is or has been connected to money laundering, we extend your monitoring of the customer to determine whether our suspicion can be disproved.

We document the results of our monitoring as a normal process of our cooperation with our partners and retain the records for at least 5 years after the end of the relationship.

### **D. Notification**

EWB-DK immediately makes a notification to relevant staff of EWB-DK, management, and, if necessary, relevant authorities and partnerships, if we are aware of, suspect, or have reasonable grounds to believe that a transaction, funds, or activity is money laundering. This also applies if we have received suspicion in connection with the customer's attempt to carry out an unusual activity. Or if a potential customer approaches us and seeks your help with something that seems suspicious.