

**BERMUDA ZOOLOGICAL SOCIETY
ANTI-MONEY LAUNDERING & ANTI-TERRORIST FINANCING POLICY**

Updated: 30 November 2017

1. PURPOSE

This Anti-Money Laundering & Anti-Terrorist Financing Policy (the “AML/ATF Policy”) establishes minimum standards designed to protect the Bermuda Zoological Society (“BZS”), its employees, its volunteers and its membership from being used to launder funds or finance terrorism (herein referred to as “AML/ATF”). The Charities Act 2014 requires each Registered Charity to implement an AML/ATF policy as part of the process of producing Annual Reports

2. SCOPE

This AML/ATF Policy applies to BZS, its employees, and its volunteers.

3. POLICY STATEMENT AND REQUIREMENTS

It is the policy of BZS, having regard to the principle of proportionality, to adhere to all applicable Bermuda AML/ATF Laws so that no process, procedure or person falling within the responsibility of the BZS can be used for money laundering or terrorist financing purposes.

4. THE MONEY LAUNDERING PROCESS

The term “money laundering” refers to a transaction or series of transactions designed to conceal the true nature and/or source of funds or assets, including cash and securities that have been derived through criminal activity. Money laundering also includes knowingly engaging in an illegal financial transaction involving the proceeds of unlawful activity and deliberately ignoring indications of suspicious activity regarding a client or transaction that may involve money laundering or terrorist financing.

Increasingly, money laundering schemes involve purportedly “legitimate” businesses seeking to use legitimate funds for illegitimate purposes (e.g., financing of terrorist activity). The party seeks to have control over the funds and provide a legitimate “cover” for the funds or unlawful activity.

5. AML COMPLIANCE PERSON DESIGNATION AND DUTIES

The BZS shall from time to time by resolution of its Executive Committee designate one or more individuals to serve as AML/ATF Compliance Officer, with full responsibility for the AML/ATF program. Any person so designated shall have a working knowledge of the Charities Act 2014 and other applicable law. The duties of the AML/ATF Compliance Officer will include monitoring the BZS’s compliance with AML/ATF obligations and overseeing any communication and training requirements for employees and volunteers, to the extent deemed necessary. The AML/ATF Compliance Officer will ensure that BZS keeps and maintains all of the required AML/ATF records and will ensure that the information is provided to be included in the Annual Report paperwork. The AML/ATF Compliance Officer is vested with full responsibility and authority to enforce the BZS’s AML/ATF Policy.

6. RISK-BASED APPROACH

It is recognized that the work of the BZS is generally domestic in nature, and involves few, if any, international payments or cross-border receipt of funds, other than through the BZS’ affiliated US registered charity, the Atlantic Conservation Partnership (“ACP”). It is further recognized that the BZS’ activities (including the receipt and disbursement of funds) relate to the furtherance of its charitable purposes, through the development of animal habitat exhibits as well as related environmental education, conservation projects and research projects, with such activities being undertaken almost exclusively within Bermuda. It is therefore acknowledged that the BZS generally has a low risk profile for AML/ATF purposes.

Notwithstanding the foregoing, the BZS acknowledges that it has a responsibility to continue to monitor its AML/ATF risk profile at all times, and if and to the extent that it is determined that the risk profile of the BZS has materially increased (whether generally or in respect of one or more specific transactions or series of transactions), appropriate action shall be taken, including (but not limited to) the application of the enhanced Customer Identification Procedures described below.

Without limiting the generality of the foregoing, the enhanced Customer Identification Procedures described below shall be applicable to any transaction or series of transactions involving receipt of funds by BZS, or any disbursement of funds by BZS where:

- such receipt or disbursement is made subject to unusual conditions or restrictions, particularly where such conditions or restrictions would not ordinarily be expected in the furtherance of the BZS' charitable purposes as described above; or
- such receipt or disbursement is made from or to a person or entity not located or ordinarily resident in Bermuda and/or is made for purposes or projects to be undertaken outside of Bermuda and/or without reference to a Bermuda purpose; **and**
- such receipt or disbursement or series of receipts/disbursements has an aggregate value greater than \$5,000

7. RECORDS OF FUNDS RECEIVED/DISBURSED

The BZS shall maintain records of all funds received and disbursements made in furtherance of its charitable purposes, such records to include:

- identification of the person or persons (or entity/ies) from/to whom such funds have been received/disbursed;
- the amount received or disbursed;
- where applicable, any conditions or restrictions applied to such receipt or disbursement.
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8. ENHANCED CUSTOMER IDENTIFICATION PROCEDURE

As described above, where it is determined that one or more transactions have a materially higher risk profile, the BZS shall apply enhanced customer identification procedures in addition to the record keeping described above. These procedures shall include a request for documents to verify the identity of donors, including the following:

- For an individual, an unexpired government-issued identification evidencing nationality or residence and bearing a photograph or similar safeguard, such as a driver's license or passport. Where the photo identification does not provide satisfactory evidence of current residential address, additional confirmation of such address should be obtained (eg. recent utility bill or bank statement); and
- For a person other than an individual, documents showing the existence of the entity, such as certified articles of incorporation, a government-issued business license, a partnership agreement or a trust instrument.

We understand that we are not required to take steps to determine whether the document that the donor has provided to us for identity verification has been validly issued and that we may rely on a government-issued identification as verification of a donor's identity. If, however, we note that the document shows some obvious form of fraud, we must consider that factor in determining whether we can form a reasonable belief that we know the donor's true identity.

We may also use non-documentary methods of verifying identity by independently verifying the donor's identity through the comparison of information provided by the donor with information obtained from a consumer reporting agency, public database or other source.

9. RECORD KEEPING PROCEDURES

We will document our verification, including all identifying information provided by a donor. Such information will be maintained by us, and should be refreshed in the event that the documents held on file were obtained more than two years prior to the transaction in question. Records will be maintained by BZS for a period of not less than 7 years from the date of receipt.

10. REGULAR REVIEW

This Policy shall be reviewed by the BZS Executive Committee on a regular basis, and not less frequently than annually.