
We Take IT for Charity Inc.

Anti-Money Laundering (AML) Policy for Accepting Cryptocurrency Donations

1. Purpose

The purpose of this AML Policy is to establish procedures and controls to mitigate the risks of money laundering and terrorist financing when accepting cryptocurrency donations. As a public charity, we are committed to transparency, regulatory compliance, and maintaining the trust of our donors, partners, and stakeholders.

2. Scope

This policy applies to all members of the charity, including the Board of Directors, staff, and volunteers involved in the acceptance, processing, and use of cryptocurrency donations.

3. Regulatory Compliance

The charity will comply with all applicable laws and regulations pertaining to anti-money laundering (AML) and combating the financing of terrorism (CFT), including those established by the Financial Crimes Enforcement Network (FinCEN), the Office of Foreign Assets Control (OFAC), and relevant state and federal authorities.

4. Definitions

- **Cryptocurrency:** A digital currency using encryption to regulate the generation of units of currency and verify transfer of funds, operating independently of a central bank. Examples include Bitcoin, Ethereum, and other digital tokens.
- **Donor Due Diligence (DDD):** Processes aimed at verifying the identity and legitimacy of donors and their contributions.
- **High-Risk Donations:** Donations received from sources or in amounts that raise potential AML or reputational concerns.

5. Risk Assessment

A comprehensive risk assessment process will be used to identify and mitigate risks related to the acceptance of cryptocurrency gifts. Factors to be considered include:

- Source and origin of the cryptocurrency.
- Amount of the donation.

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- Donor's risk profile, including prior donation history.
 - Potential red flags indicating suspicious behavior.

6. Donor Due Diligence (DDD) Procedures

The charity will conduct due diligence on donors of cryptocurrency gifts as follows:

- **Verification:** For donations exceeding \$5,000 (or equivalent value in local currency at the time of donation), the charity will collect and verify the donor's name, address, and proof of identity (e.g., government-issued ID).
- **Know Your Donor (KYD) Process:** Conduct background checks when necessary and screen against national and international sanctions lists and politically exposed persons (PEP) lists.
- **Ongoing Monitoring:** Transactions and donor profiles may be subject to periodic review to detect patterns that indicate potential illicit activities.

7. Acceptable Cryptocurrencies

The charity will maintain a list of approved cryptocurrencies that may be accepted, based on factors such as market stability, regulatory considerations, and capacity for transaction tracking.

8. Conversion of Cryptocurrency to Fiat Currency

Cryptocurrency donations will be promptly converted to fiat currency through a reputable exchange or payment processor with robust AML and KYC practices to reduce exposure to market volatility and improve transaction traceability.

9. Record Keeping

All cryptocurrency transactions and donor verification records will be securely stored and retained for at least five years in compliance with AML record-keeping regulations.

10. Training and Education

All employees and volunteers involved in the acceptance of cryptocurrency gifts will receive AML training, including how to identify and report suspicious activities.

11. Reporting Suspicious Activity

The charity will report any suspicious activity or transactions to the appropriate authorities, including filing Suspicious Activity Reports (SARs) where required by law.

12. Governance and Oversight

The Board of Directors or a designated committee shall oversee the implementation and effectiveness of this AML Policy, including conducting periodic reviews and updates to reflect changes in regulatory requirements and evolving best practices.

13. Non-Compliance

Failure to comply with this policy may result in disciplinary action, up to and including termination of employment or volunteer service, as well as potential legal consequences.

This policy is intended to promote responsible and lawful acceptance of cryptocurrency donations while protecting the charity's integrity and reputation. For questions regarding this policy, please contact Jeffrey S. Wallace Jeff@wetakeit.net 630.696.0190