Charity Organization «Charity Fund named after Avhustyn Voloshyn»

Regulations on the Prevention of Money Laundering

Prevention of the legalisation (laundering) of proceeds of crime and terrorist financing (AML/CFT)

Approved

by decision of the Board of the Fund

Minutes No. 2 of 7 September 2026

English translation · the Ukrainian original prevails

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the Charity Organization «Charity Fund named after Avhustyn Voloshyn»
Minutes No. 2 of 7 September 2026

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REGULATIONS ON THE PREVENTION OF THE LEGALISATION (LAUNDERING) OF PROCEEDS OF CRIME AND TERRORIST FINANCING

1. General Provisions

1.1. These Regulations on the Prevention of the Legalisation (Laundering) of Proceeds of Crime, Terrorist Financing and the Financing of Proliferation of Weapons of Mass Destruction (hereinafter — the Regulations) define the internal procedures of the Charity Organization «Charity Fund named after Avhustyn Voloshyn» (hereinafter — the Fund) aimed at preventing the use of the Fund for the legalisation of illegal proceeds or for terrorist financing.

1.2. The Regulations have been drawn up taking into account the Law of Ukraine «On Prevention and Counteraction to Legalisation (Laundering) of the Proceeds of Crime, Terrorist Financing and Financing of Proliferation of Weapons of Mass Destruction», the FATF recommendations for the non-profit sector and the requirements of the Fund's main international donors (in particular the US State Department, EU institutions and UN agencies).

1.3. The Fund recognises the increased risks of the charitable sector being used for the legalisation of proceeds or for terrorist financing and applies a risk-based approach to checking the sources of income, counterparties and beneficiaries.

2. Checking the Sources of Funds

2.1. The Fund accepts charitable contributions, grants and donations only from donors whose identity (or, for legal entities, the identity of the ultimate beneficial owner) has been established and the lawfulness of whose source of funds raises no reasonable doubt.

2.2. Before accepting a large or atypical donation (from a previously unknown donor, in cash above the established limit, or from jurisdictions classified by the FATF as high-risk), the Fund carries out enhanced due diligence of the donor: establishing their identity and checking them against public sanctions lists (including the

lists of the National Security and Defence Council of Ukraine, the EU, the UN and OFAC).

2.3. The Fund refuses to accept a donation or grant if:

— the donor, or the ultimate beneficial owner of a donor that is a legal entity, appears on sanctions lists or lists of persons associated with terrorism;

— the source of the funds cannot be reasonably confirmed;

— the terms on which the funds are provided imply their misuse or the concealment of the source or the recipient of the funds.

3. Checking Counterparties and Beneficiaries

3.1. The Fund's counterparties (suppliers, contractors, partner organisations) are checked against sanctions lists before a contract is concluded for an amount exceeding the threshold set by the Procurement Regulations, and periodically (at least once a year) in the case of counterparties under long-term contracts.

3.2. When providing direct financial assistance to beneficiaries (cash payments), the Fund establishes the identity of the recipient and documents the fact of and grounds for the assistance in accordance with Section 5 of the Regulations on Financial Compliance and, for significant amounts, checks the recipient against sanctions lists.

4. Restrictions on Cash Transactions

4.1. The Fund complies with the restrictions on cash settlements established by Section 3 of the Regulations on Financial Compliance and neither makes nor accepts cash payments above the limits established by the legislation of Ukraine on cash settlements.

4.2. Receiving cash donations exceeding the established internal threshold requires additional identification of the donor and recording of the source of the funds.

5. Responsible Person and Training

5.1. The functions of monitoring compliance with these Regulations are assigned to the Fund's Officer responsible for the prevention of corruption and for financial monitoring (this may be the same position as defined by the Anti-Corruption Programme) or to the Chief Accountant of the Fund by the relevant decision of the Board.

5.2. The responsible person undergoes periodic training in financial monitoring and communicates the main requirements of these Regulations to the employees

involved in receiving donations and making payments.

6. Detecting and Reporting Suspicious Transactions

6.1. If a transaction with signs of being unusual is detected (no economic rationale, inconsistency with the stated purpose of the donation, an attempt to avoid identification of the donor or recipient), the responsible person records the transaction and informs the Executive Director and the Board of the Fund.

6.2. Where there are grounds established by law, the Fund performs the obligations of a primary financial monitoring entity (provided that the Fund acquires such status in accordance with the law) or, in the absence of such status, voluntarily informs the authorities designated by law of suspicious transactions.

7. Final Provisions

7.1. These Regulations are approved by the Board of the Fund and reviewed at least once a year, as well as whenever the legislation of Ukraine on financial monitoring or the requirements of the Fund's main donors change.

Charity Organization «Charity Fund named after Avhustyn Voloshyn»:

Chair of the Board _____ / V.A. Moskov /

7 September 2026



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