



## SolidarMed Guidelines

### **Policy to prevent Money Laundering**

(ML)

## 1. Definition of money laundering

Money laundering (ML) is the process of concealing the origins of illegally obtained funds. SolidarMed is committed to maintain and strengthen robust financial controls, conduct due diligence, and foster transparency to mitigate risks related to ML.

## 2. Purpose of these regulations

This Anti-Money Laundering Policy is established to ensure that SolidarMed operates in full compliance with all applicable laws, regulations, and best practices to prevent the abuse of its resources and operations for ML activities and prevent possible reputational risks. It provides principles and guidance regarding anti-money laundering requirements and applies to all staff, volunteers, contractors, subcontractors, and affiliates within the organization.

SolidarMed is committed to operating with the highest level of integrity and transparency. Through our robust anti-ML practices, we aim to ensure that our activities are not exploited for illicit activities.

## 3. SolidarMed key principles

**Compliance with laws:** SolidarMed will comply with all national and international anti-money laundering laws and relevant local regulations in the countries where we operate, including Switzerland,

**Due Diligence:** All donors and partners need to undergo proper screening to ensure they are legitimate, and their financial transactions are not linked to illegal activities. This includes performing background checks and reviewing the source of funds for any potential red flags.

**Risk Assessment:** Regular risk assessments will be conducted to identify vulnerabilities related to money laundering and terrorism financing. This assessment will guide our internal controls and mitigation measures.

**Monitoring and Reporting:** Transactions will be closely monitored for suspicious activities or patterns that may suggest money laundering, such as large or unusual donations. Any suspicious activity will be reported immediately to the relevant authorities in compliance with local laws.

**Training and Awareness:** All staff will receive regular training on identifying and preventing money laundering activities. This training is being tailored to the local context and the specific risks associated with our operations and may include external experts, depending on the identified needs.

**Record keeping:** All financial records, including donations, expenditures, and grants, will be maintained for a minimum of ten years to ensure full transparency and to support external audits by relevant authorities.

**Confidentiality:** SolidarMed will ensure that the information on partners and transactions are kept confidential.

**Collaboration:** SolidarMed will exchange and cooperate with local authorities, international bodies, and other NGOs to share information, raise awareness, and collectively work to combat money laundering.

**Implementation and Enforcement:** This policy will be enforced by the SolidarMed Integrity Focal Points and the SolidarMed Integrity Committee. The SolidarMed board will be informed twice yearly on progress and any challenges. Any staff member found in violation of this policy will face disciplinary action, which may include termination of employment or contractual agreements.

SolidarMed will not engage with:

- Partners who do not reasonably cooperate with its due diligence efforts
- Partners engaged in activities of corruption, fraud and conflict of interests
- Partners who are currently under any financial sanctions imposed by United Nations.

## 4. Responsibilities

All SolidarMed staff, partners, consultants and other associated persons shall be responsible for:

- Complying with this policy and related regulations and standards (such as the other SolidarMed Integrity Policies and internal regulations)
- Familiarizing themselves with and acting in accordance with relevant SolidarMed processes and procedures to manage anti ML compliance; and
- Reporting to the superior or to the Integrity Focal Person without undue delay any suspicions (or actual occurrences) or red flags of ML activities.

## 5. Scope of application

This policy refers to all financial transactions, donations, grants, and partnerships involving SolidarMed. Based on our mission and vision, this policy reflects the fundamental values and principles of our organization, to be applied irrespective of the cultural context. Each collaborator of SolidarMed is supposed to adhere to it to protect SolidarMed from being misused for ML.

This Policy applies to all employees worldwide<sup>1</sup> in any contractual relationship with SolidarMed, including interns, volunteers, board members as well as implementing partners and service providers, at all times during their assignment with SolidarMed. This document is an integral part of any employment contract with SolidarMed.

All organizations with whom SolidarMed collaborates and has financial transactions are made aware of our relevant policies and regulations during partnership negotiations. The respective document is the Code of Conduct for Contracted Parties, which is a summary of the key elements of all SolidarMed Integrity Policies.

## 6. Reporting of Misconduct

Any violations of this Policy must be reported through the established reporting channels. Whistleblowers will be protected and must not suffer any retaliation for reporting concerns in good faith.

## 7. Policy management

- Policy approval date: September 2025
- Policy approved by: SolidarMed Board
- Policy version: 1.0
- Policy language: English
- Policy review: Every 4 years
- Policy owner (in charge of conducting review, dissemination, training and learning): SolidarMed focal point integrity

<sup>1</sup> In Switzerland, the program countries or any other country