POLICY FOR THE PREVENTION AND FIGHT AGAINST MONEY LAUNDERING AND TERRORIST FINANCING

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Preamble

In addition to the applicable contractual and legal documents, CartONG has policies and procedures that reflect its commitments to integrity:

- The Code of Conduct;
- The Policy on Preventing and Combating Sexual Exploitation and Abuse (PSEA);
- The Policy for the Prevention and Management of Conflicts of Interest;
- The Policy for the Prevention and Fight against Fraud and Corruption;
- An internal whistleblowing system.

These documents apply to all members of CartONG and allow everyone to have a common ethical framework.

This policy on the prevention and fight against money laundering and terrorist financing is part of this framework.

All these documents can be consulted on CartONG's internal computer network for its members and on CartONG's website for third parties.

1. Definitions

As part of its mission and activities, CartONG must protect itself against the risks of misappropriation of its resources, both financial and material, in particular against money laundering and terrorist financing.

Money laundering: Money laundering refers to the act of voluntarily concealing money due to its illegal origin by reinvesting it in legal activities. Examples: Arms trafficking; Drug trafficking; Theft; Tax fraud; Corruption; Illegal speculation; Extortion; etc.

Terrorist act: An act of terrorism means any act intended to kill or seriously injure a civilian or any other person not taking a direct part in hostilities in a situation of armed conflict, when, by its nature or context, the act is intended to intimidate a population or to compel a government or an international organization to perform or refrain from performing any act.

Group identified as "terrorist": means any natural or legal person or group officially classified or designated as "terrorist" by the United Nations, a State concerned or the European Union, and "identified" means any individual, group or entity so identified.

Terrorist financing: The provision of funds and/or other material resources for the preparation, propagation or implementation of a terrorist act or for a legal or natural person associated with such an act.

Sanctions lists and asset freezes: Lists of all the freezing measures adopted in the context of the fight against terrorism, whether they are UN, EU and French sanctions. Under the provisions, asset-freezing measures are enforceable by natural and legal persons. They impose a strict prohibition on the provision of funds, directly or indirectly, to listed persons or entities.

Sanctions: Financial or commercial restrictive measures against natural persons, legal entities or entities. These measures take the form of prohibitions and restrictions on trade in targeted goods, technologies or services with certain countries, measures to freeze funds and economic resources, and sometimes restrictions on access to financial services.

It should be noted that CartONG's activities take place mainly in France or the European Union and that 98% of payments are made by bank transfer via a French bank that already screens before validating transfers.

2. Purpose

Committed to a constant effort to ensure the proper management of its operation and activities, CartONG takes all measures in its power to prevent and detect the risks of loss or misappropriation of the resources entrusted to it and, if necessary, to carry out the necessary investigations and take exemplary sanctions.

As such, CartONG applies the principle of "zero tolerance" against investigators and accomplices of acts of money laundering and terrorist financing, particularly concerning the use of its resources, whether they are its employees or its external partners (operational partners, suppliers).

CartONG does not tolerate money laundering and terrorist financing practices in any way in the conduct of its activities and implements measures to reduce the risks and effects of such practices.

In order to achieve this objective, CartONG will not knowingly or recklessly provide funds, economic goods or material support to any natural or legal person designated as a "terrorist" by the international community, and will take all reasonable measures to protect its assets from such illicit use. And thus in compliance with international sanctions.

That being said, CartONG cannot bear the burden and responsibility of the fight against money laundering and terrorist financing alone in the environment of its interventions, which is primarily the responsibility of local and international authorities, including international agencies and donors. Nevertheless, as far as its activities are concerned, it takes appropriate measures within the limits of its prerogatives and resources, giving priority to the individual safety and security of its staff.

In addition, in its commitment against money laundering and terrorist financing, CartONG is careful not to encourage a culture of mistrust and generalized suspicion.

3. Scope

3.1. Members and staff of the organisation

The permanent members and staff of CartONG (whatever their status: volunteers, board members, employees, permanent consultants, interns or civic services) and more generally to any associated or intermediary person or organization, employed by the organization and acting on its behalf. Therefore, CartONG makes sure that they are aware of the existence of this policy and its implications.

3.2. Implementing partners (organisations and institutions)

CartONG also takes the information and risk management measures that this policy implies, in the context of relations with operational partners, who, although not acting on its behalf, interact with it within the framework of partnership agreements.

3.3. Businesses and suppliers of goods and services

CartONG also takes information and risk management measures with companies, suppliers and consultants who interact with it within the framework of contracts.

4. Prevention and identification measures

4.1. Prohibition of all acts of money laundering and terrorist financing

CartONG "member" staff and other entities mentioned in Article 3 of this policy must not participate, directly or indirectly, in an act of money laundering and terrorist financing within the meaning of this policy.

No promotion or support for terrorism will be tolerated as well as any violation of international financial sanctions.

4.2. Importance of prevention

Fully aware that money laundering and terrorist financing can be most effectively avoided by creating an effective organizational culture that uses money prudently, CartONG has developed a series of preventive mechanisms and internal control systems aimed at preventing and identifying money laundering and terrorist financing, in particular included in the various internal procedures in terms of finance, logistics, human resources, etc.

4.3. Prevention and identification mechanisms

CartONG has developed mechanisms that can help prevent money laundering and terrorist financing such as:

- To give the "member" staff of CartONG and the other entities mentioned in Article 4 of this policy a good understanding and clear direction and to encourage them to take ownership of CartONG's values and policies, in particular through the information measures provided for in Article 9 of this policy.
- Putting in place appropriate controls, including accounting and operational controls, and ensuring that these controls are working – so that teams are empowered and can use common sense, and this means allowing staff to be trained.
- Ensure the legal origin of the funds invested in the projects.

In accordance with our internal control, we invite all actors detecting anomalies or suspicions of anomalies to inform their superiors or to use the alert procedure and more particularly:

- Any rule violations detected during internal controls
- Any breach of the Code of Conduct and Ethics
- Any suspicious transaction involving criminal groups, groups or involved in acts of terrorism or money laundering

4.4. Screening

At the contractual request of donors, we carry out screening operations according to sanctions and asset freeze lists against persons who commit or attempt to commit, facilitate or participate in terrorist acts. These operations apply to organisations and their staff directly involved in such a co-financed project.

Exclusion of Ultimate Recipients:

- In accordance with its principles and values in particular of non-discrimination and independence, as well as the humanitarian principles of impartiality, neutrality, CartONG does not screen the final beneficiaries (natural persons) recipients of the projects nor will it require its local partners to do so.

4.5. Ensuring the transparency of financial flows

CartONG's remittances will only be allowed to local partner organizations, in order to meet the expectations of partner banks, especially in high-risk countries, with:

- Identification of the final recipient of funds (legal entity) in requests for transfer of funds

If there is no bank account in the name of the local association, it will be necessary to have the identity card of the natural person to whom the bank account belongs and a letter signed by the legal representative of the association, authorizing a transfer of funds to this specific account.

5. Roles & Responsibilities

5.1. Neutrality

The "member" staff of CartONG and the other entities mentioned in Article 3 of this policy must carry out their duties in a neutral and apolitical manner, in compliance with the law, legitimate instructions and ethical rules relating to their functions.

5.2. Impartiality

In the course of their professional duties and/or missions, CartONG "member" staff and other entities mentioned in Article 3 of this policy must act in accordance with the law and exercise discretion impartially, considering only the relevant circumstances.

5.3. Confidentiality

Taking due account of the possible right of access to the information of the stakeholders, the "member" staff of CartONG and the other entities mentioned in Article 3 of this policy must treat in an appropriate manner, with all the necessary confidentiality, in order to guarantee in particular, the protection of their privacy, all the information and documents acquired in the exercise, or in the performance of their duties.

5.4. Professional Resources

CartONG "Member" staff and other entities referred to in Article 3 of this Policy shall ensure that staff and the goods, facilities, services and financial resources entrusted to them are managed and used in a useful, efficient and economical manner. They must not be used for private purposes unless authorized in writing.

5.5. Directors' liability

The CartONG management (salaried director and board of the association) in charge of running the association must do so in accordance with the policies and objectives of CartONG. It will be held accountable for acts and omissions of its personnel that are contrary to these policies and objectives if it has not taken the steps that due diligence required of a person in his or her position to prevent such acts or omissions.

It must also take the necessary measures to prevent its staff from engaging in acts that could constitute money laundering or terrorist financing. These measures may include drawing attention to the importance of applying laws and regulations, providing adequate training in anti-money laundering and countering the financing of terrorism and setting an example in one's personal conduct as mentioned in Article 4 of this policy.

6. Procedure & documentation

For more information, please refer to the whistleblowing system and the internal regulations of CartONG.

6.1. Information

The person or persons who are aware of the potential existence of an act of money laundering or terrorist financing committed concerning another person "member", partners or service providers of CartONG, have the duty to inform their Hierarchical Superior (if it is not the person concerned) as well as the "Alert Unit" via the email alerte@cartong.org, providing sufficient evidence or arguments to be able to determine whether there is a case of money laundering or terrorist financing.

This information must take place as soon as the potential case is known.

Declarations made in the context of this policy will be considered confidential and will only be communicated (internal or external, as the case may be) if necessary, in accordance with the "need to know" principle (imperative need to be aware of information in the context of a specific function and for the proper performance of a specific mission).

CartONG shall ensure that "member" staff who report a case provided for above based on reasonable suspicion and in good faith do not suffer any harm. Cases of clear abuse in the use of the mechanisms are subject to sanctions.

The act may also be revealed through the screening of the persons mentioned in Article 4.4.

6.2. Investigation

The Alert Unit will convene the Alert Committee to study the case presented with all possible data and the person who reported the case of money laundering and terrorist financing will be heard. Thereafter, that person will leave the meeting, and, after discussions, the Alert Committee will decide whether an investigation is necessary to determine whether or not money laundering or terrorist financing has been committed.

For more information, refer to the alert processing system.

6.3. Documentation

The minutes of the Alert Committee meetings must include:

- The names of all the people who have intervened since the beginning of the process with a description of their interventions.
- A description of the elements that lead to a finding of money laundering or terrorist financing, if any.
- The final decision.

These documents will be kept electronically on the Association's network in a file specific to the Alert Committee, for the duration of the contractual relationship concerned.

7. Penalties

Any breach of this policy may result in disciplinary action against the person concerned by the money laundering and terrorist financing case, in accordance with the Internal Regulations, up to and including dismissal for an employee.

For elected officials or volunteer members of CartONG, sanctions may go as far as their exclusion from the association according to the association's statutes.

For operational partners, we will have to terminate the current contract (According to the commitments made with the funder).

And finally, for service providers and suppliers, this will result in an immediate cessation of the service.

8. Advertisement

This policy has been the subject of information and consultation with the Social and Economic Committee (CSE) in accordance with the legal provisions.

A specific article framing the prevention and fight against money laundering and the financing of terrorism is inserted in the contracts with CartONG's service providers and operational partners. And this policy will be available to them.

Each current member of the Association is informed of the existence of the policy on the prevention and fight against money laundering and the financing of terrorism via electronic communication when it comes into force and updates, and new members are informed during their integration briefing.

All current or newly recruited members of CartONG are required to read and declare that they have read this Policy and agree to abide by it. A document to this effect will be signed by each of the members in two copies, one kept by CartONG, the other for the signatory member.

Members are informed that this document may be given to the association's donors who request it.

9. Effective date

This policy on preventing and combating money laundering and terrorist financing will come into force on September 1, 2026.

Done in Chambéry on 31/07/2026

Signature of Sophie Oddo, as Co-Director of CartONG



Signé électroniquement par
Sophie Oddo
Le 31/07/2026 à 14:33