

Anti-Money Laundering Policy 2025

1. Introduction:

Rainforest Foundation US / Rainforest Foundation US Perú (RFUS) are committed to maintaining integrity and ensuring compliance with all applicable anti-money laundering (AML) laws and regulations. This policy is designed to establish guidelines and procedures to detect and prevent the organization from being used for money laundering, terrorist financing, or any other illicit financial activities.

RFUS's role as a partner, donor, and financial sponsor, providing support to Indigenous organizations, requires it to take steps to detect, prevent, and report money laundering activities before they impact programming, reputations, and other areas.

This policy expands on the RFUS **Ethics and Code of Conduct**, which outlines ethical standards and acceptable behavior applicable to RFUS operations and complements the RFUS internal policies on **Anti-Corruption, Conflict of Interest**, and **Whistleblowers** included in the [RFUS Employee Handbook](#) and [RFUS website](#).

2. Scope of this Policy:

This Policy applies to all RFUS employees, interns, volunteers, and representatives (jointly, "RFUS staff"), as well as (i) RFUS partners who receive any funding directly from RFUS to implement activities; and (ii) independent contractors/consultants paid directly by RFUS and their employees, and representatives (jointly, "implementing partners").

3. Our principles and actions:

Awareness

Money laundering is the process of disguising illegally obtained funds as legitimate income, allowing criminals to integrate illicit money into the financial system without detection. This process enables criminals to finance illegal activities such as drug trafficking, terrorism, and corruption while evading law enforcement.

The consequences of money laundering extend beyond financial losses, posing severe **legal, economic, and reputational risks** to RFUS and partner organizations. Organizations can face **hefty fines, regulatory sanctions, or criminal charges** if found to be complicit, whether knowingly or due to weak financial controls.

RFUS complies with the USA Patriot Act, Title III, International Emergency Economic Powers Act (IEEPA), IRS Regulations, and other US federal and state laws, and other international laws and norms by confirming to the following standards:

Prevention: RFUS believes that the prevention of money laundering is a shared responsibility. All must play an active role in preventing and addressing any related concerns while delivering RFUS business. RFUS takes a risk-based approach to preventing money laundering

Know your Donor / Know your Partner

Before accepting donations or engaging in partnerships, RFUS shall conduct due diligence by:

- Verifying the identity of major donors and partners.
- Assessing the legitimacy of funds received.
- Keeping records of donor and partner information.

Risk Assessments

A risk-based approach shall be used to assess and mitigate AML risks, focusing on:

- **High-Risk Donors/Transactions:**
 - Large or irregular cash donations
 - Anonymous donors
 - Funds from high-risk jurisdictions
 - Request to refund donations to different accounts
 - Unusual transactions that lack a clear philanthropic purpose
- **High-Risk Activities:**
 - Financial transactions involving politically exposed persons
 - Entities that are subject to sanctions.
- **High Risk Behaviors:**
 - Donors or partners unwilling to provide identifying information
 - Pressure to bypass due diligence or financial controls
 - Attempts to use multiple intermediaries or complex structures

Monitoring & Reporting

Employees must remain vigilant for red flags, such as:

- Large or unusual cash donations.
- Donations with unclear origins or conditions.
- Requests for refunds or transfers to third parties.

Suspicious activities shall be promptly reported to complaints@rainforestus.org and will be evaluated to determine whether to escalate the matter to relevant authorities.

4. Reporting Incidents:

All RFUS Staff are required to report any concerns or violations of this policy to RFUS leadership following the mechanism included in the [whistleblower policy](#).

Implementing partners are required to report concerns via complaints@rainforestus.org for the RFUS Executive Director's review.

Individuals may report concerns or complaints on a confidential basis via complaints@rainforestus.org for the RFUS Executive Director's review.

All RFUS staff and **implementing partners** who receive a verbal report or hear concerns from another individual must immediately share all pertinent information with the RFUS Executive Director or the Director of Programs.

Retaliation against any individual who submits a report in good faith is strictly prohibited under the RFUS [Whistleblower Policy](#).

Implementing partners shall cooperate with RFUS and RFUS-designated parties and ensure the cooperation of individuals and entities (under their control) in any money laundering-related investigation.

As appropriate, RFUS will report to the relevant authorities with jurisdiction over the criminal prosecution of money laundering offenses.

5. Consequences of Policy Violations:

If an investigation confirms that RFUS staff has violated a policy, RFUS will take disciplinary action, including termination as appropriate under its policies and applicable law.

If an investigation confirms that an implementing partner failed to comply with the applicable contractual language in any grantee agreement, MOU, or service provider contract, remedial action will result, including, but not limited to, additional training, warning, termination of the agreement for a cause with immediate effect, or potential disqualification from future contracts or grants with RFUS.

6. Definitions:

Money Laundering: the process of disguising illegally obtained funds as legitimate income, allowing criminals to integrate illicit money into the financial system without detection. This process enables criminals to finance illegal activities such as drug trafficking, terrorism, and corruption while evading law enforcement.

Implementing Partners: RFUS partners who receive any funding directly from RFUS to implement activities, and independent contractors/consultants paid directly by RFUS and their employees and representatives.

Politically Exposed Person is an individual who holds, or has held, a **prominent public position**, domestically or internationally, that may make them more vulnerable to involvement in corruption, bribery, or financial crimes—particularly money laundering.

Retaliation: Any direct or indirect detrimental action recommended, threatened, or taken because an individual has been the victim of or reported suspicion of alleged misconduct in good faith, such as sexual exploitation or abuse, or participated in an authorized audit or investigation. Retaliation may include denial of aid or inequitable allocation of assistance, adverse administrative actions, such as, but not limited to, unwarranted poor performance evaluations, changes in job duties, a hostile work climate, or other negative decisions affecting the individual's terms and conditions of employment. Retaliation may also take the form of verbal abuse or harassment.

RFUS Staff: all employees, interns, volunteers, and representatives from Rainforest Foundation US and Rainforest Foundation US Perú.

7. Appendix:

References:

USA Patriot Act: <https://www.congress.gov/107/plaws/publ56/PLAW-107publ56.htm>

US Treasury Financial Crimes Enforcement Network: <https://www.fincen.gov/>

International Emergency Economic Powers Act (IEEPA):

<https://uscode.house.gov/view.xhtml?edition=prelim&path=%2Fprelim%40title50%2Fchapter35>

IRS Money Laundering and Currency Crimes: https://www.irs.gov/irm/part9/irm_09-005-005

New York Money Laundering Laws:

<https://www.findlaw.com/state/new-york-law/new-york-money-laundering-laws.html>

California Money Laundering Laws:

<https://www.findlaw.com/state/california-law/california-money-laundering-laws.html>