

MYSMALLHELP AUSTRALIA LIMITED

POLICY FOR THE DISTRIBUTION OF FUNDS OVERSEAS AND PROTECTION AGAINST TERRORISM FINANCING

Introduction

The purpose of this policy of MySmallHelp Australia Limited (**MySmallHelp**) is to ensure that that funds distributed overseas are used only for the purposes intended and not for any harmful or criminal activity such as terrorism.

1. Funds distributed overseas

MySmallHelp makes payments to companies, businesses or individuals that are based overseas (**Overseas Entities**) who assist in providing charitable services for MySmallHelp's activities. MySmallHelp will only make payments to Overseas Entities if:

- (a) the directors of MySmallHelp have conducted due diligence in relation to the Overseas Entity, in accordance with MySmallHelp's due diligence policy, and have verified the identities of the persons who will be responsible for the use of the funds;
- (b) the Overseas Entity has entered into a binding fundraising agreement with MySmallHelp;
- (c) the funds are transferred overseas by electronic funds transfer, with a reference to the stated purpose of the funds and an accompanying cover letter confirming their purpose;
- (d) the recipient of the funds provides:
 - (i) a written undertaking that the funds will be used exclusively for the stated purpose; and
 - (ii) evidence of use of funds, for example by way of project updates, expense reports, invoices or accounts;
- (e) where funds are distributed overseas to pay for third party services, the service provider must provide MySmallHelp with an invoice and receipt for payment; and
- (f) MySmallHelp will employ its best endeavours to ensure that funds are not distributed either directly or indirectly to terrorist organisations, in contravention of the Criminal Code Act 1995 (Cth). To this effect, MySmallHelp will take the following steps in relation to each of the projects that it funds:
 - (i) from time to time, review the list of terrorist organisations provided on the Australian National Security website to check that overseas partners are not listed;
 - (ii) ensure that MySmallHelp knows the recipient of the funds and conducts extensive due diligence in relation to any project it intends to fund; and
 - (iii) educate all of MySmallHelp's responsible people in relation to risk management and control of funds as set out in this policy.

2. Review of policy

This policy shall be reviewed by the board of MySmallHelp every two years as a minimum.

Policy adopted on [insert date].