

Anti-Money Laundering and Counter-Terrorist Financing Policy



ClientEarth is committed to meeting the highest standards of integrity, transparency, and fairness in the conduct of its activities. We take a zero-tolerance approach to the offences of money-laundering and terrorist-financing. We wish to foster a culture in which everyone is aware of what these offences are and feels comfortable raising any related concerns.

This Policy sets out ClientEarth’s process to prevent money-laundering and terrorist-financing, and makes staff aware of their responsibilities in observing and upholding ClientEarth’s position on anti-money laundering and counter-terrorist financing. It is also designed to comply with our legal obligations.

This Policy has been approved by ClientEarth’s Executive Team, and reflects our values.

Values	Application in this Policy
Acting courageously	<ul style="list-style-type: none">We will report any money-laundering or terrorist-financing, including suspicions
Prizing diverse experience	<ul style="list-style-type: none">We use specialist advice to ensure that we are compliant with anti-money laundering and counter-terrorist financing laws, wherever we operate
Embracing collaboration	<ul style="list-style-type: none">We recognise the expertise of our Finance and Governance & Legal Services Departments to support staff in implementing relevant policies and procedures
Learning continuously	<ul style="list-style-type: none">The Policy Owner will respond to questions and feedback on this Policy and monitor relevant legislative developments to update it as appropriate
Opposing injustice	<ul style="list-style-type: none">We take a zero-tolerance approach to money-laundering and terrorist-financing. We have a duty to report all suspected incidents, and to investigate and take appropriate action against anyone involved in money-laundering or terrorist-financing
Focusing on impact	<ul style="list-style-type: none">We conduct all our activities in an honest, ethical, transparent, and fair manner, in order to maximise impact

What is the Scope of this Policy?

This Policy applies to all ClientEarth entities and staff worldwide, including governance and management board members of all ClientEarth entities, who are expected to use best judgment in applying this Policy, and to play an active part in preventing non-compliance and in promoting best practices.

All staff are responsible for preventing, detecting, and reporting money-laundering and terrorist-financing. Staff non-compliance with this Policy could be considered as a breach of employment agreement, and could lead to disciplinary action by ClientEarth, in line with local labour law.

We achieve impact using funding provided by Funders, and through collaboration with Partners, and we hold them to the same standards of honesty, integrity, transparency, and fairness as we hold ourselves. Non-compliance may result in the termination of appointments, contracts, or other formal agreements. We work with our Partners and Funders to ensure that they raise concerns with us at the earliest opportunity. This Policy is publicly accessible to all, as well as our reporting channel via the **TellUs** tab, on our [Transparency | ClientEarth](#) webpage.



ClientEarth's Principles-Based Approach to Anti-Money Laundering and Counter-Terrorist Financing

Principle 1: We take a zero-tolerance approach to money-laundering and terrorist-financing

ClientEarth prohibits money-laundering (i.e., the process through which proceeds of a crime and their true origin are concealed or changed so that the proceeds appear legitimate) **and terrorist-financing** (i.e. the process of providing or collecting funds from legitimate or illegitimate sources for the conduct of terrorist activities).

Principle 2: We are committed to acting with integrity, transparency, and fairness in all environments

We strive to act professionally and in accordance with these standards in our activities and relationships. We enforce effective systems to counter money-laundering and terrorist-financing, using our financial control environment and risk mitigation tools (e.g., robust procurement, due diligence and contracting processes, delegation of authorities, and segregation of duties). ClientEarth's activities span many countries, and practices may vary, but the same standards are applied wherever we work. An operating environment with a higher prevalence of money-laundering or terrorist-financing calls for extra vigilance, and additional financial and other controls may need to be applied.

Principle 3: Payment requests from third parties must only relate to signed agreements or orders

Payments must be supported by an invoice or a Partner financial report. Payments will only be made to the bank account provided by the Partner in the agreement. Partner bank details will never be changed based on an email alone.

Principle 4: Caution should be exercised when Public Officials or Politically Exposed Persons are involved

Extra caution must be taken when interacting with Public Officials or PEPs and their close personal connections. Many laws treat interactions with Public Officials or PEPs differently from those with other individuals, and may not allow charities to financially interact with PEPs. In any event, money-laundering or terrorist-financing concerning a Public Official or PEP could lead to significant reputational damage.

Principle 5: All concerns in relation to money-laundering and terrorist-financing must be reported

Where staff, Partners, Funders, or any member of the public are aware of or have concerns in relation to money-laundering or terrorist-financing, they should report it immediately. Anyone who raises a concern under this Policy is protected under our Whistleblowing Policy, which will apply to the investigation and treatment of the report.

Principle 6: All reports of money-laundering and terrorist-financing will be investigated and managed in a timely, diligent, and impartial manner, and irregular or suspicious transactions will be suspended promptly

Reports will be acknowledged and resolved promptly. Reports shall be investigated by (an) impartial and competent investigation officer(s), on a need-to-know basis. ClientEarth will also report incidents to Funders and regulators (e.g. Serious Incident report to the Charity Commission), as required, promptly and transparently. Any transaction or contractual relationship that may constitute a suspicious activity, or is reported as such, will be suspended until an investigation is completed and the relevant Funder, if any, has given permission for activities to continue.

Brussels Beijing Berlin London Warsaw Madrid Los Angeles Luxembourg

ClientEarth is an environmental law charity, a company limited by guarantee, registered in England and Wales, company number 02863827, registered charity number 1053988, registered office 10 Queen Street Place, London EC4R 1BE, a registered international non-profit organisation in Belgium, ClientEarth AISBL, enterprise number 0714.925.038, a non-profit limited liability company in Germany, ClientEarth gGmbH, HRB 202487 B, a registered foundation in Poland, Fundacja "ClientEarth Prawnicy dla Ziemi", KRS 0000364218, NIP 7010254208, a registered delegation in Spain, Fundación ClientEarth Delegación en España, NIF W0170741C, a registered 501(c)(3) organisation in the US, ClientEarth US, EIN 81-0722756, a registered subsidiary in China, ClientEarth Beijing Representative Office, Registration No. G1110000MA0095H836, a registered subsidiary in Japan, Ippan Shadan Hojin ClientEarth, corporate number 6010405022079, a registered subsidiary and company limited by guarantee in Australia, ClientEarth Oceania Limited, company number 664010655.