



**TEMPLATE-FIA COMPLIANCE PROGRAM/POLICY IN TERMS  
OF THE FINANCIAL INTELLIGENCE ACT, 2012 (ACT NO.13 of  
2012) AS AMENDED**

**NAME OF THE NPO.....**

**A. INTRODUCTION**

NPOs, including Faith Based Organisations (FBOs) are required to develop, adopt and implement the FIA compliance program [see FIA sections 39(3,4,5 &7)].

A FIA Compliance Program is a document(s) that explains how the institution intents to comply with the obligations described in the law. It is also the guiding and principle document(s) that an NPO should have in place to direct the operations of the company to ensure the mitigation of Money Laundering (ML), Terrorist Financing (TF) AND Proliferation Financing (PF) risks.

Note that this is a guidance document, availing minimum guidance of what the compliance framework of an NPO should include. NPOs are encouraged to consider implementing additional controls that ensure effective mitigation of risks they may be exposed to.

***Note that the term Faith Based Organisation (FBOs) used herein includes all faith based organisations such as Churches, mosques, and any other religious equivalents.***

**B. PURPOSE OF THE NPO: (Please describe the main activities of the FBO or NPO below)**

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**C. ENTITY INFORMATION ON FIA COMPLIANCE**

1. Organisation’s legal form (if registered, please attach copy of registration documents, if any)

Close Corporation  PTY (Ltd)  Sole Proprietor  Partnership  Other .....

If registered, please avail Registration Number.....

2. Ownership structure: Names of **owners** of the NPO and donors of the organisation, and/or FBO leaders, wardens, or beneficial owners, etc.

- a. ....
- b. ....
- c. ....
- d. ....

3. Managers, NPO/FBO leaders, directors, Promoters: Names of NPO/FBO leaders, directors, managers, promoters of the NPO/FBO:

- a. ....
- b. ....
- c. ....
- d. ....

**D. IDENTIFICATION OF DONORS AND BENEFICIAL OWNERS**

NPOs/FBOs are required to implement internal operational controls to maintain adequate identification information of all donors and beneficial owners (Section 21&22 of FIA).

The below information is the minimum required information to be obtained from donors when an NPO/FBO receives or disburses funds from a donor and beneficial owners, if such funds are in excess of NAD 5,000.00 per person:

- 1. Full Names of individuals/Companies (for natural persons, obtain ID copies and for entities, obtain registration/incorporation documents);
- 2. Local /Foreign Donor;
- 3. Residential address information/Business address;
- 4. Contact details;
- 5. Occupation/Source of income/Nature/Type of business activities; and
- 6. Source/origin of funds involved in the transaction being proposed or concluded with the NPOFBO.









NAME:.....

SIGNATURE:.....

**DISCLAIMER:**

*The information contained herein is not necessarily final, nor a complete reflection of all FIA compliance expectations for NPOs. This is a guiding document informed by the FIA and FIC observations from current engagements with NPOs, the ongoing National Risk Assessment, international best practices etc. Where need be, contents herein might change as per ongoing engagements with the NPO sector. This document is thus a framework which helps the FIC and the NPO sector find each other in creating a path to compliance. NPOs should ensure that the controls they implement are responsive to their risk exposure.*