

CONTENTS

	PURPOSE	2
	POLICY	2
A	Anti-Money Laundering	2
B	Counter Terrorist Financing	4
C	Financial Sanctions	5
D	Export Controls	6
E	Anti-bribery and corruption	7
F	Fraud	8
	FURTHER INFORMATION	10
	PROCEDURES	10
	APPENDIX 1 – RELEVANT INTERNATIONAL LEGISLATION	11

PURPOSE

The Donkey Sanctuary has a zero tolerance towards criminal activity of any kind.

The Donkey Sanctuary's reputation is based on doing the right thing and we are committed to ensuring we adhere to all laws and regulations applicable to our activities and we expect our branches and subsidiaries to have the same zero tolerance towards any criminal activity.

The Donkey Sanctuary values its reputation for ethical behaviour and for financial probity and reliability. It is committed to ensuring the highest possible standards of openness, probity and accountability are implemented in the prevention of financial crime across the regions within which it operates.

The Donkey Sanctuary's financial crime policy aims to highlight:

- a) the areas of financial crime that The Donkey Sanctuary may be targeted for and/or exposed to;
- b) support the prevention, as much as is possible, of The Donkey Sanctuary being used for financial crime;
- c) comply with the applicable legal requirements; and,
- d) ensure that the most appropriate action is taken by The Donkey Sanctuary to identify and mitigate the risks associated with financial crime.

POLICY

The Donkey Sanctuary's policy on financial crime applies to all staff, volunteers and parties (vendors/ donors, etc.) working with or contributing to The Donkey Sanctuary and encompasses the following areas (this is a global policy that works across all international offices):

- A. Anti-money laundering (AML);
- B. Counter terrorist financing (CTF);
- C. Financial sanctions;
- D. Export controls;
- E. Anti-bribery and corruption;
- F. Fraud.

A Anti-Money Laundering

Money laundering is the term used to describe the ways in which criminals process illegal or 'dirty' money derived from the proceeds of any illegal activity (e.g., the proceeds of drug dealing, human trafficking, fraud, theft, tax evasion) through a succession of transactions and deals until the original source of such funds has been obscured and the money takes on an appearance of legitimate or 'clean' funds.

There are three internationally accepted phases to money laundering:

Placement – this involves the first stage at which funds from the proceeds of crime are introduced into the financial system or used to purchase goods. This is the time at which the funds are most easily detected as being from a criminal source. Such 'dirty money' will often be in the form of cash or negotiable instruments such as travellers' cheques.

Layering – this is where the funds pass through a number of transactions in order to obscure the origin of the proceeds. These transactions may involve entities such as companies and trusts (often offshore).

Integration – this is when the funds are available via a legitimate source and allow the criminal to enjoy access to the funds again, with little fear of the funds being detected as being from a fraudulent source.

Money laundering offences

The consequences of committing an offence are potentially very serious and fall within **Proceeds of Crime Act 2002 (POCA 2002) Part 7 - Money Laundering Offences**. Whilst it is considered unlikely that staff, branches, subsidiaries and volunteers would commit any of the three main offences, failing to reveal a suspicion of a case of money laundering to the authorities, via the channels set out in this policy, is an offence in itself.

Furthermore, raising your concerns or suspicions about a potential financial crime with the person you suspect constitutes the crime of “tipping off” for which you can be held accountable.

In the United Kingdom, money laundering offences can be tried at a Magistrates Court or a Crown Court, depending upon the severity of the suspected offence. If someone is found guilty in a Magistrates Court, they can be fined or face a prison sentence or both. In a Crown Court, fines are unlimited and prison sentences range from two to fourteen years.

The main money laundering offences are:

- **Concealing criminal property etc. (s327 POCA 2002)** – where someone knows or suspects a case of money laundering but conceals or disguises its existence. Concealing or disguising criminal property is defined as concealing or disguising its nature, source, location, disposition, movement or ownership or any rights with respect to it [POCA section 327(3)].
- **Arranging (s328 POCA 2002)** – where someone involves himself or herself in an arrangement to assist in money laundering.
- **Acquisition, use and possession (s329 POCA 2002)** – where someone tries to benefit from money laundering by acquiring, using or possessing the item concerned. Possession means having physical custody of criminal property.

Failing to disclose, tipping off etc.

Some countries underpin their preventive anti-money laundering regimes with administrative sanctions only. The UK has chosen to underpin the preventive regime with criminal sanctions to emphasise the importance of proper systems of reporting and control.

- **Failure to disclose offence: other nominated officers (s332 POCA 2002)** - s332 creates a separate offence of failure to disclose in respect of nominated officers **outside** of the regulated sector who receive disclosures and who do not pass the information to the National Criminal Agency (NCA) as the disclosure receiving agency when they know or suspect; or have reasonable grounds for knowing or suspecting that another person is engaged in money laundering.
- **Tipping off offence (s333 POCA 2002)** – creates the offence of making a disclosure likely to prejudice a money laundering investigation being undertaken by law enforcement authorities. – i.e., where someone warns a person who is, or is suspected of being involved in money laundering in such a way as to reduce the chance that they will be investigated or prejudice an investigation.

Application to the Donkey Sanctuary:

The following are example scenarios in which this may apply to the Donkey Sanctuary activities:

- An individual or third-party organisation makes a donation and then requests a refund or part refund to a different bank account or country from which the funds were presented.
- An individual or third party makes a large payment for goods/ services in cash.

To mitigate against the risks of Money Laundering the Donkey Sanctuary has established a policy and process for documenting suspicious donations within the 'Acceptance and Refusal Policy'. This policy details the overarching principles The Donkey Sanctuary applies when:

- Accepting donations;
- Refusing donations; and,
- Returning donations.

This policy should be followed by all Donkey Sanctuary offices. The investigation of any suspect donation is the responsibility of the Head of Fundraising, supported by the Senior Philanthropy Manager. Any queries on the application of the policy should be directed to the Head of Fundraising.

Payments for goods and services are not usually made in cash, where this does happen it is typically for items of low value. If a large payment was received in cash Treasury would notify Accounts Receivable who would query the transaction with the payee and ensure the source of funds was understood.

If you suspect any instances of money laundering, please speak with your line manager and/or email gfdclosures@thedonkeysanctuary.org.uk. Please be assured all information will be treated in strictest confidence.

B Counter Terrorist Financing

Terrorist financing is the raising, moving, storing and using of financial resources for the purposes of terrorism.

Money comes from legitimate sources but is used for terrorist activities. The most basic difference between terrorist financing and money laundering involves the origin of the funds. Terrorist financing uses funds for an illegal political purpose, but the money is not necessarily derived from illicit proceeds. On the other hand, money laundering always involves the proceeds of illegal activity. The purpose of laundering is to enable the money to be used legally.

What is Terrorist Financing?

Terrorist Financing refers to the processing of funds to sponsor or facilitate terrorist activity. A terrorist group builds and maintains an infrastructure to facilitate the development of sources of funding for their own requirements and possibly to launder the funds used in terrorist activity.

Terrorist organisations derive income from a variety of sources, often combining both lawful and unlawful funding which can be grouped into two types:

1. Financial Support – In the form of donations, community solicitation and other fund-raising initiatives. Financial support may come from States, from large organisations or from individuals; and,
2. Revenue Generating Activities – Income from criminal activities such as kidnapping, extortion, smuggling or fraud. Income may also be derived from legitimate economic activities such as diamond trading or real estate investment.

Terrorist groups will want to disguise illegal funds while at the same time preserving the continuity of or maximising revenue from legitimate sources. The need to camouflage the sources of funds means that terrorist financing has certain similarities with traditional money laundering, namely the

use of the three steps to place, layer and integrate the funds in the international financial system.

Offences

The consequences of committing an offence are potentially very serious and fall within the **Terrorism Act 2000** as well as **Proceeds of Crime Act 2002**. The offence of terrorist financing involves the provision, collection or receipt of funds with the intent or knowledge that the funds will be used to carry out an act of terrorism or any act intended to cause death or serious bodily injury. It also includes collecting or receiving funds intending that they be used or knowing that they will be used for the benefit of a terrorist group.

Application to the Donkey Sanctuary:

The following are example scenarios in which this may apply to the Donkey Sanctuary activities:

- Supporting an organisation which may use the funds for terrorist purposes.
- Supporting an organisation which may use the funds from the Donkey Sanctuary for the intended purpose but is in receipt of other funding which is being used for terrorist activity.

To mitigate the risks associated with Terrorist Financing the Donkey Sanctuary has established a due diligence checklist to be used when reviewing potential Partners. All organisations have sanctions checks applied including a review of any politically exposed persons (PEPs) involved with the organisation.

If you have any queries about the application of due diligence when accepting a Partner these should be addressed to the Head of Programmes Support – International Programmes and Partnership.

You must report a belief or suspicion of offences connected to terrorist financing to your line manager and/or email gfdclosures@thedonkeysanctuary.org.uk. Please be assured all information will be treated in strictest confidence.

C Financial Sanctions

It is a criminal offence to breach financial sanctions, this applies to charities and non-governmental organisations (NGOs) including individual members of staff regardless of whether they are government funded. Financial sanctions are restrictions put in place by organisations/state/countries including; the United Nations (UN), European Union (EU), United Kingdom (UK), United States (USA), Canada and Japan.

Financial sanctions are generally imposed to:

- coerce a regime, or individuals within a regime, into changing their behaviour (or aspects of it) by increasing the cost on them to such an extent that they decide to cease the offending behaviour;
- constrain a target by denying them access to key resources needed to continue their offending behaviour, including the financing of terrorism or nuclear proliferation;
- signal disapproval, stigmatising and potentially isolating regime or individual, or as a way of sending broader political messages nationally or internationally; and/or,
- protect the value of assets that have been misappropriated from a country until these assets can be repatriated.

The sanctions either target individuals and/or organisations and can:

- Limit the provision of certain financial services; and,
- Restrict access to financial markets, funds and economic resources.

If it is established that an organisation is dealing with a sanctioned individual or organisation, it is policy that three steps will be taken:

1. Office of Financial Sanctions Implementation (OFSI) will be contacted immediately;
2. The funds and economic resources in our possession will be frozen; and,
3. Funds and/or economic resources will not be made available to them.

Application to the Donkey Sanctuary:

The following are example scenarios in which this may apply to the Donkey Sanctuary activities:

- Carrying cash/currency into/out of a country in excess of the country limit set by the OFSI, the UK and the destination country; and,
- Carrying cash/currency into/out of a sanctioned country where this is prohibited by OFSI and the UK.

To mitigate against the risk that the Donkey Sanctuary breaches any sanctions there is a Travel Policy and a process for issuing cash required when travelling abroad "Issuing Foreign Petty Cash". The use of cash is discouraged and only acceptable as a last resort when no other forms of payment are acceptable. Any amount requested over the value of £1,000 is notified to the Finance Manager – Treasury to check the validity and the nature of the request.

Should you have any queries or points of clarification over the correct application of the policy please contact the Finance Manager Treasury.

If you suspect any instances of an individual or an organisation breaching financial sanctions, please speak with your line manager and/or email gfcdisclosures@thedonkeysanctuary.org.uk.

Please be assured all information will be treated in strictest confidence.

D Export Controls

Export controls are essentially a network of inter-related regulations that govern and regulate the shipment or transfer, by whatever means, of controlled items.

Should we need to import or export goods we must assess whether any financial sanctions apply. If this is required a licence from the Office of Financial Sanctions Implementation (OFSI) as well as from the UK's Export Control Organisation (ECO) may be required.

Application to the Donkey Sanctuary:

The following are example scenarios in which this may apply to the Donkey Sanctuary activities:

Import/ Export of pharmaceuticals/ medicines; and,

Import/ Export of any equipment checked against the prohibitive list.

To mitigate against this risk there is a guide for exporting goods used by Finance and a list of exported goods is maintained with all applicable details (type of goods, customs value, Country of Origin, Tariff code).

Should you have any queries or points of clarification on the import and export of goods please contact the Financial Controller.

If you suspect any instances of an individual or an organisation breaching financial sanctions, please speak with your line manager and/or email gfcdisclosures@thedonkeysanctuary.org.uk.

Please be assured all information will be treated in strictest confidence.

E Anti-bribery and corruption

. In the UK, the key legislation is the Bribery Act 2010, There are four principal offences:

- Requesting, accepting or agreeing to accept a bribe;
- Offering, paying or agreeing to pay a bribe;
- Bribing a foreign official; and,
- Failure to prevent bribery.

The Act extends to cover not only to employees and volunteers, but to our agents and subsidiaries too.

Bribery and corruption rules are not just aimed at cash payments, but cover gifts, travel, entertainment, training programmes, work experience, charitable contributions and sponsorships where it is used to gain an unfair advantage through the performance or failure to perform certain acts.

The Donkey Sanctuary is committed to the prevention, deterrence and detection of bribery and has a zero tolerance to any member of staff, volunteer or agent who actually or attempts to participate in it. The Donkey Sanctuary does not and will not pay bribes or offer improper inducements to anyone for any purpose, nor do we, or will we, accept bribes or improper inducements.

To use a third party as a conduit to channel bribes to others is a criminal offence. The Donkey Sanctuary does not and will not, engage indirectly in or otherwise encourage bribery.

A charge of failure to prevent bribery essentially presumes guilt and the only defence is that the organisation had adequate procedures. Failure to follow anti-bribery procedures as set out by TDS may result in disciplinary action for gross misconduct.

Application to the Donkey Sanctuary:

The following are example scenarios in which this may apply to the Donkey Sanctuary activities:

- Third parties seeking to make a financial payment or benefit to staff/ volunteers in order to secure a contract for goods/ services, e.g., money for awarding a contract (“kickbacks” or services, such as additional building work on the staff members property at no/ reduced cost if a contract is awarded);
- Third parties seeking to incentivise staff or volunteers to provide them with confidential information in respect of a tender process; and,
- Officials seeking payment for release of a confiscated passport or provision of medicines (facilitation payment).

To mitigate against the risks associated with vendors the Donkey Sanctuary has a comprehensive procurement recommended practice document. This outlines the need to apply appropriate due diligence, follow ethical standards, disclose any conflicts of interest and not to accept any gifts or hospitality from potential suppliers.

Should you have any queries or points of clarification around the correct application of the procurement recommended practice, please contact the Head of Procurement.

It is also reiterated in the Expenses Policy that the organisation prohibits the giving, offering, solicitation, or acceptance of any bribe (whether in cash or otherwise) to or from any person or

company wherever they are situated or by an individual employee(s) or other person or body acting on our behalf in order to obtain a perceived advantage.

If you suspect any instances of an individual or an organisation being involved in bribery, please speak with your line manager and/or email gfcdisclosures@thedonkeysanctuary.org.uk.

Please be assured all information will be treated in strictest confidence.

F Fraud

Fraud describes such acts as deception, bribery, forgery, extortion, corruption, theft, conspiracy, embezzlement, misappropriation, false representation, concealment of material facts and collusion. It usually involves depriving someone of something by deceit, which might either be straight theft, misuse of funds or other resources, or more complicated crimes such as false accounting and the supply of false information. Fraud is not restricted to monetary or material benefits but includes intangibles such as status and information.

Section 1 of the Fraud Act 2006 creates a general offence of fraud and introduces three ways of committing it set out in Sections 2, 3 and 4.

Fraud by false representation (Section 2); - the individual made a false representation, dishonestly, knowing that the representation was or might be untrue or misleading with intent to make a gain for himself or another, to cause loss to another or to expose another to risk of loss.

Fraud by failure to disclose information when there is a legal duty to do so (Section 3) – the individual failed to disclose information to another person when he was under a legal duty to disclose that information, dishonestly intending, by that failure, to make a gain or cause a loss.

Fraud by abuse of position (Section 4) – the individual occupies a position in which he was expected to safeguard, or not to act against, the financial interests of another person, abused that position, dishonestly, intending by that abuse to make a gain/cause a loss.

In each case:

- the defendant's conduct must be dishonest;
- his/her intention must be to make a gain; or cause a loss or the risk of a loss to another;
- no gain or loss needs actually to have been made; and,
- the maximum sentence is 10 years' imprisonment.

The Donkey Sanctuary has zero tolerance of fraud of any type or in any circumstances, whether carried out by volunteers, staff, contractors, partners or clients. Fraud against The Donkey Sanctuary depletes funds intended for the accomplishment of our values and programme delivery, diverting donor contributions. Fraud affects The Donkey Sanctuary's reputation and ability to attract ethical donations.

Application to the Donkey Sanctuary:

The following are example scenarios in which this may apply to the Donkey Sanctuary activities:

- Staff members falsifying expense claims and/ or hours worked for payment
- Third parties submitting false changes to supplier bank details in order for payments to be made directly to the fraudster
- Submitting false invoices for payment.
- An individual purporting to be a senior member of staff requesting an urgent payment to an account ("CEO" fraud).

To mitigate against the risk of Fraud the Donkey Sanctuary has a number of policies and procedures in place and established controls to follow.

All expense claims or additional hours claimed are subject to review and authorisation by an employees' line manager as highlighted in the expenses policy.

Any requests to change an organisations bank details are independently verified with a known contact by Accounts Payable before being processed in the accounting system. Changes to Bank details are emailed to the Finance Manager Treasury and a system log is maintained as an audit trail.

All invoices need to be matched to a purchase order or authorised on eBIS by a staff member with the appropriate authorisation levels. All suppliers go through a new supplier set up process with appropriate due diligence performed by both Procurement and Finance.

Should you have any queries or points of clarification around fraud please contact: your line manager or Head of Audit and Assurance, The Donkey Sanctuary, Sidmouth, EX10 0NU

If you suspect any instances of an individual or an organisation being involved in Fraud, please speak with your line manager and/or email gfcdisclosures@thedonkeysanctuary.org.uk. Please be assured all information will be treated in strictest confidence.

FURTHER INFORMATION

PROCEDURES

Our guiding principles are set out in our suite of policies and procedures which are designed to mitigate, prevent, detect and manage financial crime. It aims to raise the awareness of financial crime and its prevention within the donkey sanctuary and to give guidance on both the reporting of financial crime and how any investigation would proceed. It summarises the various controls and mechanisms which the donkey sanctuary has in place.

1	Acceptance and Refusal Policy		
2	Fundraising Policy		
3	Due Diligence Questionnaire for contracts		
4	Expenses Policy		
5	Foreign petty cash process		
6	Export guide DS UK to DS subsidiaries		
7	Export Log		
8	DS Procurement Recommended Practice		
9	Corporate Hospitality Register		
10	Declaration of Interests		
11	Whistleblowing Policy and Procedures		
12	Managing complaints policy and procedures		
13	Disciplinary procedure		
14	Employee Handbook		
15	Social responsibility policy		
16	Staff and Volunteer Code of Conduct		

APPENDIX 1 – RELEVANT INTERNATIONAL LEGISLATION

Below we have outlined local legislation for offices outside of the UK and highlighted any extra requirements or reporting responsibilities.

CYPRUS - The Donkey Sanctuary (Cyprus) Limited

No requirements have been identified in the Global Policy that are inconsistent with the local Cypriot law. There are no additional controls required to meet legislative requirements in Cyprus.

Any incidences relating to Anti-Money Laundering and Counter Terrorist Financing should be reported to The Unit for Combating Money Laundering (MOKAS) in Cyprus.

ETHIOPIA - The Donkey Sanctuary Ethiopia NGO - a branch of The Donkey Sanctuary (UK)

The regulatory body for Charities (The Authority for Civil Society Organizations) is under reform

There is no direct fraud reporting requirement by the Authority yet However, there are clauses in the proclamation which have consequences if found fraudulent:

1. Article 59 – the authority may refuse to register the charity in instances where the documents presented for registration is fraudulently obtained or forged;
2. Article 59 – an organization who has obtained a certificate of registration using fraudulent documents will be dissolved by the authority; and
3. Article 65 – the charity shall not engage a person as a board member or officer who is previously found fraudulent.

There is also a money laundry and terrorist financing directive at the draft stage. This directive has a lot of reporting requirement on charities on this area.

All the assets of the organizations are considered as public properties and NGOs have an obligation to report to the Authority the status of its assets every year and any loss as a result of fraud or any inconstancies will be requested by the authority for explanation.

Any suspicion of Money Laundering or Terrorist Financing is to be reported to the Financial Intelligence Service. <https://www.fic.gov.et/>

ITALY - Rifugio degli Asinelli

There is specific Italian Legislative Decree 231/2001 that relates to direct liability of legal entities in respect of criminal offences committed by their personnel/employees in the interest or to the advantage of the legal entities.

In addition to this Legislative Decree, the following legislation is in place:

Fraud: Law 262/2005

Bribery: Law 190/2012 and Law 3/2019 against private and public corruption

Anti-money laundering: Legislative Decree 231/2007;

Export Controls: DPR 43/73 that regulates goods movements through the Italian borders and the customs requirements.

Terrorism: Legislative Decree 109/2007 for facing the terrorism financing and the Countries' activities that threaten international peace and security N/A

None of the above legislation requires extra work over and above what is outlined in the main body of the Global Financial Crime Policy to comply with UK regulations.

If there was any suspicion of Financial Crime it would be required to be reported to the Public Prosecutor, the Tax Police and the Anti-bribery National Commission.

IRELAND - The Donkey Sanctuary (Ireland) Limited

A. Anti-Money Laundering

In Ireland, the penalty on summary conviction can result in a fine not exceeding €5,000 or imprisonment for a term not exceeding 12 months (or both) or;

On conviction of indictment, one may be subject to a fine or imprisonment for a term not exceeding 14 years or both

In Ireland there are Criminal Justice (Money Laundering & Terrorist Financing) Acts 2010 to 2018 which cover what is included in the Proceeds of Crime Act in the UK.

B. Counter Terrorist Financing

Terrorist Offences fall within the Criminal Justice (Terrorist Offences) Act 2005, along with the Criminal Justice (Money Laundering & Terrorist Financing) Acts 2010 to 2018 in Ireland as opposed to the United Kingdom's legislation under which these offences are included in the Terrorism Act 2000 and Proceeds of Crime Act 2002.

C. Financial Sanctions

The Central Bank is responsible for financial regulation in Ireland, including administration, supervision and enforcement of financial sanctions

The steps for dealing with suspicion or knowledge of terrorist financing are as follows:

1. Send a suspicious transaction report to An Garda Síochána and the Revenue Commission
2. If customer is matched to terrorist list – suspicious transaction report sent to Financial Intelligence Unit in the Garda Bureau of Fraud Investigation and make a report to the Central Bank

The Criminal Justice (Terrorist Offences) Act 2005 provides guidance for further steps

D. Export Controls

The Department of Enterprise, Trade and Employment is responsible for the implementation of trade related sanctions in Ireland

The Export Licensing Unit of the Department of Jobs, Enterprise and Innovation in Ireland governs the enforcement and management of controls on exports of dual-use items, military items and items destined for countries with trade sanctions – covering the UK's Export Control Organisation

The primary legislation covering this in Ireland is the Control of Exports Act 2008

E. Anti-Bribery and Corruption

The Criminal Justice (Corruption Offences) Act 2018 is the key legislation which governs bribery and corruption in Ireland

F. Fraud

In Ireland the governing legislation for fraud is the Criminal Justice (Theft and Fraud Offences) (Amendment) Act 2021

KENYA - The Donkey Sanctuary (Kenya) Limited

In Kenya there are a number of key acts to be aware of relating to Financial Crime:

Proceeds of Crime and Anti-Money Laundering Act Chapter 59B Laws of Kenya.

The penal code

Prevention of Terrorism Act No. 30 of 2012

Anti-Corruption and Economic Crimes Act, 2003

None of these acts impose any more requirements on the Donkey Sanctuary operations in Kenya. If Financial Crime is suspected there are a number of regulators to report to including:

The Anti Money Laundering Advisory Board

The Asset Recovery Agency

The Financial Reporting Centre

MEXICO - The Donkey Sanctuary Mexico - a branch of The Donkey Sanctuary (UK)

The following are local laws, regulations and guidelines that are applicable in Mexico in order to be in compliance with anti-bribery, corruption and fraud related-items.

Anti-Bribery & corruption - The General Law of Administrative Responsibilities:

Fraud - The Federal Criminal Code

Anti-Money Laundering / Terrorist Financing - The Federal Law for the identification and prevention of Operations with Resources of Illicit origin.

None of these local laws require the Donkey Sanctuary to do more than what they are already doing to comply.

IF there were any instances of Financial Crime identified they would need to be reported to the Mexico Unit of Finance Intelligence.

NETHERLANDS - The Donkey Sanctuary Nederland

The Dutch foundation (Stichting The Donkey Sanctuary Nederland) is not an entity that is obliged to comply with regulations under the Dutch anti money laundering and terrorist financing act (Wwft).

There are no extra requirements for operating in the Netherlands.

SPAIN - El Refugio Del Burrito

Due to the limited activity and the legal status of El Refugio Del Burrito, there are no extra requirements in terms of Financial Crime within Spain.

However, any suspicion of Money Laundering or Terrorist Financing is required to be reported to:

SEPBLAC the supervisory authority for the prevention of money laundering and the financing of terrorism. <https://www.sepblac.es>

The Protectorate for Foundations

THE DONKEY SANCTUARY

Slade House Farm, Sidmouth, Devon EX10 0NU

T [44] (0)1395 578222 **F** [44] (0)1395 579266 **E** enquiries@thedonkeysanctuary.org.uk
www.thedonkeysanctuary.org.uk

The Donkey Sanctuary was founded by Dr Elisabeth Svendsen MBE in 1969.

The Donkey Sanctuary (registered charity number 264818) and its sole corporate trustee, The Donkey Sanctuary Trustee Limited (Company number 07328588), both have their registered office at Slade House Farm, Sidmouth, EX10 0NU.

Linked charities: The Elisabeth Svendsen Trust for Children and Donkeys (EST); The International Donkey Protection Trust (IDPT).

WORKING WORLDWIDE