Anti-Money Laundering and Counter-Terrorist Financing Policy

Consejo Internacional para la Lucha contra la Corrupción, Asociación Civil

Preamble

Consejo Internacional para la Lucha contra la Corrupción, Asociación Civil ("CILC" or "the Association") is committed to preventing its business, accounts, and services from being used, directly or indirectly, for money laundering, terrorist financing, sanctions evasion, or the handling of proceeds of crime. This commitment is absolute and applies regardless of commercial pressure, transaction size, or the identity of the counterparty.

This Policy is informed by Argentine anti-money laundering legislation, in particular **Ley No. 25.246** as amended, the regulations and resolutions of the **Unidad de Información Financiera (UIF)**, the Argentine Penal Code, and international standards including the **FATF (GAFI) Recommendations** and the **United Nations Convention against Transnational Organized Crime**. Although the Association's ordinary activities as a non-profit civil association may not make it a directly obligated subject (sujeto obligado) under every UIF regime, the Association voluntarily adopts the preventive principles below as a matter of integrity and sound risk management.

I. Definitions

Money laundering means any act intended to conceal or disguise the illicit origin of funds or assets, or to convert, transfer, acquire, possess, or use assets knowing or suspecting that they derive from criminal activity, so as to make them appear legitimate.

Terrorist financing means the provision or collection of funds or assets, by any means, with the intention or knowledge that they will be used, in whole or in part, to support terrorist acts, individuals, or organizations.

II. Core Prohibitions

- No person acting for the Association may knowingly accept, transfer, hold, or disburse funds or assets that derive from, or are intended to support, criminal activity.
- The Association shall not enter into transactions with persons or entities designated on applicable sanctions lists, including United Nations Security Council sanctions lists and the UIF list of persons linked to terrorism, and shall exit any relationship where such designation is discovered.
- The Association shall not structure, split, or disguise transactions to avoid reporting thresholds, banking controls, or tax obligations, and shall not use personal accounts, front entities, or informal value-transfer channels for Association business.
- Cash payments shall be avoided and are prohibited above the limits established by Argentine law (Ley No. 25.345 on limitation of cash transactions); Association receipts and payments shall flow through bank channels in the Association's name.

III. Know Your Counterparty (KYC)

Before entering into a significant business relationship, the Association shall identify and verify its counterparty using reliable documentation, including, as applicable: legal name and registration (CUIT, IGJ or equivalent registry data), the identity of representatives and, where warranted by risk, of ultimate beneficial owners; address and contact details; and the general nature and legitimacy of the counterparty's business. Enhanced diligence shall be applied to counterparties that are politically exposed persons (PEPs), are located in high-risk jurisdictions, request unusual payment arrangements, or are involved in public procurement on the Association's behalf.

IV. Red Flags

Personnel shall be alert to warning signs, including, without limitation:

- requests to pay or be paid in cash, in cryptocurrency without justification, through third parties unrelated to the contract, or into accounts in names or jurisdictions unrelated to the counterparty;
- overpayments followed by refund requests; invoices that do not correspond to real goods or services; prices materially inconsistent with market value;
- counterparties unwilling to provide basic identification or documentation, or whose ownership is opaque without commercial justification;
- unusual urgency, secrecy, or requests to alter documentation after the fact.

Where a red flag arises, the transaction shall be suspended and the matter escalated to the President and to **info@cilclegal.org** before proceeding.

V. Escalation, Reporting, and Cooperation

Any employee or representative who knows or suspects that a transaction may involve money laundering or terrorist financing must report it immediately through the channels established in the Whistleblowing Policy. The Association shall assess such reports, document its analysis, decline or terminate the transaction where suspicion cannot be resolved, and cooperate fully with the UIF, ARCA, and judicial and law-enforcement authorities, including by filing any reports required of it under applicable law. No person shall tip off a counterparty that it is under review, where such disclosure is prohibited by law.

VI. Records, Training, and Responsibility

KYC documentation and transaction records shall be retained for at least ten (10) years or such longer period as applicable law requires. Personnel involved in contracting, purchasing, and finance shall receive periodic training on this Policy. The President is responsible for its implementation and annual review. Violations of this Policy constitute serious misconduct and may result in termination of employment or contract and referral to the competent authorities.

Signed by:

Dzianis Limarau
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Date: 11 September 2026