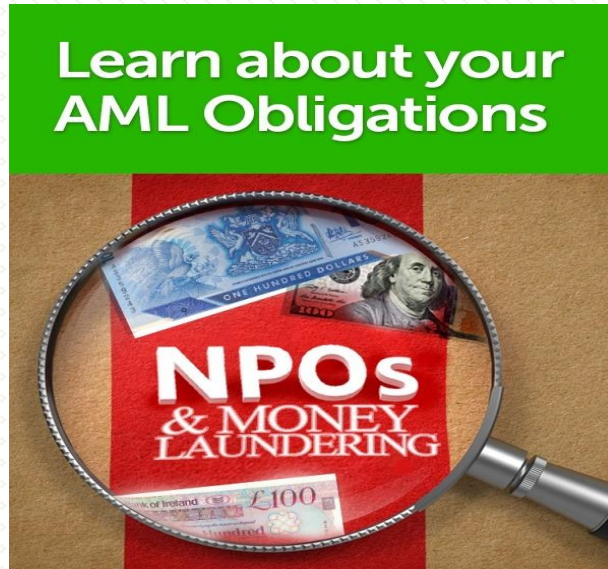




AML For NPOs (Non-Profit Organisations)



Are you a Non-Profit Organisation?

Are you a body of persons, whether incorporated or unincorporated and has been established for the promotion of the following objects and who raise or disburse for the objects?

1. Patriotic	2. Religious	3. Philanthropic
4. Charitable	5. Educational	6. Cultural
7. Scientific	8. Literary	9. Historical
10. Artistic	11. Social	12. Professional
13. Fraternal	14. Sporting	15. Athletic

If the answer is Yes,

- ✓ You are subjected to Anti-Money Laundering Obligations
- ✓ You must Register with the Registrar General by December 31, 2020!!

Anti-Money Laundering Regulator for NPOs

Does your (NPO) gross annual income exceeds \$500K?

- If the answer is yes, the FIU will be responsible for the AML/CFT/PF supervision of your non-profit organisation.
- The Regulator shall, using a risk-based approach, determine the level of supervision required for the non-profit organisation under the FIU Act.

Under present laws and regulations, NPOs MUST comply with Anti- Money Laundering Laws and Regulations:

- The Financial Intelligence Unit of Trinidad and Tobago Act
- The Proceeds of Crime Act, Chap. 11:27
- The Anti-Terrorism Act, Chap. 12:07
- And their respective Regulations

Inter alia, some of NPOs AML Obligations include:



“To protect your NPO from being used by criminals, the FIU advises that measures be implemented by each NPO to deter and detect transactions related to money laundering and terrorist financing and to report of suspicious activities/ transactions to the FIU”

Guidance Note on NPO – FIUTT July 18, 2019

Registration of NPO

NPO Act Sec 5 (3) - An application for registration as a non-profit organisation shall be made by a **controller** of a non-profit organisation to the Registrar General in the form prescribed by Rules.

“controller” means a person who has the control or management of a non-profit organisation

- (a) a director of a non-profit company, where the non-profit organisation is established as a non-profit company;
- (b) a trustee of a trust, where the non-profit organisation is established as a trust;
- (c) a person responsible for the management or administration of an unincorporated body, where the non-profit organisation is established as an unincorporated body;
- (d) a senior officer of the non-profit organisation; or
- (e) a person not specified in paragraphs (a) to (d) where the non-profit organisation is controlled or managed by that person;

Illegal to operate an NPO without Certificate of Registration

Sec 5 (1) A person shall not operate a non-profit organisation in Trinidad and Tobago unless the non-profit organisation is registered under this Act.

(2) A person who contravenes subsection (1) commits an offence and is liable on conviction on indictment to a fine of fifty thousand dollars and to imprisonment for seven years.

AML For NPOs

This tailor-made AML Training for NPOs is designed for persons and businesses who carry on activities of an NPO consistent with the Non-Profit Organisations Act, 7 of 2019, to be aware of their Anti Money Laundering / Counter Financing of Terrorism obligations and responsibilities under the laws and regulations.

The discourse will provide participants with the necessary information and tools to establish systems, procedures and controls to meet AML/CFT obligations in order to avoid sanctions, penalties, disqualification and possible imprisonment.

Certificate of Participation

A certificate of participation will be provided to all participants.

Training Material

To aid in participants learning and understanding, an extract of the presentation and supplemental material will be supplied to all participants.

Areas to be covered

Participants will be exposed to the following key AML obligations areas:

• Criminal Conduct/Criminal Property	• Record Keeping
• AML Regulator and Powers	• Controllers and their Responsibilities - NPO
• Suspicious Reporting	• AML Provisions in NPO Act
• SOFDs / KYC / CDD	• FIU Compliance Examinations
• AML Obligations – Laws / Regulations	• Offences and Penalties
• NPO Registration / Renewal / Cancellation	• Independent Testing - Audits
• Effective of Compliance Function	• Offences and Penalties

Attendance Fee

The cost for the training is conditional on a number of factors including number of participants, participants level, organisation, etc.

Payments for training can be made by cheque payable to NEM Leadership Consultants or Direct Deposit to the organisation's bank account.

Registration and Training Delivery

All approved participants will be expected to be registered. Training will be delivered virtually through the organisation's licensed CISCO Webex Application System.

Date of Event

Training will be mutually scheduled between client and training Consultant

Information

For info email info@nemlctt.com or call 1-868-222-8928