



ETHICAL FUNDRAISING & DUE DILIGENCE POLICY

This policy will be reviewed on an ongoing basis, at least once a year. Aerial Recovery will amend this policy, following consultation, where appropriate.

APPLICABILITY

This policy applies to all trustees, volunteers, employees, contractors, and third-party representatives of the charity. Its requirements should be reflected in other policies and procedures, agreements and contracts, as necessary.

Aerial Recovery partners with a variety of different organizations, projects, programs and initiatives and so it is important to take a risk-based approach to assessing suitability when exploring partnerships and agreements. Aerial Recovery may ask for specific information to be disclosed, as part of the grant/donation application process.

For technical, legal or financial issues, this may involve seeking appropriate professional opinion and guidance.

WHAT IS ETHICAL FUNDRAISING & DONOR DUE DILIGENCE?

Fundraising donor due diligence is the process of assessing the legitimacy, credibility, and ethical practices of organizations and individuals involved by carrying out checks to ensure that the donation complies with legal and ethical standards.

FACTORS TO CONSIDER WHEN ASSESSING THE SCALE OF RISK

- Is the amount of money involved substantial (\$100,000 or above)?
- Is the project/contract particularly sensitive, important, complex or large scale?
- Is the organization/individual well known and respected, or might they hold views, undertake activities or work in an area that may be controversial or potentially problematic?
- How much potential is there for things to go wrong and what's the worst that could happen?

CONDUCTING DUE DILIGENCE

In light of the degree of risk, Aerial Recovery may carry out such checks as are necessary to ensure that these risks are appropriately mitigated.

In respect to people's privacy, Aerial Recovery will only carry out investigations where there is a legitimate business/charitable integrity purpose in doing so, ensure that findings are kept secure, only disclose information to those who need to know and not retain information longer than necessary.

When preparing due diligence reports, Aerial Recovery will be objective, stick to facts, and take into account the reliability of sources to ensure the report is balanced.

FUNDRAISING DUE DILIGENCE - DONOR COMPLIANCE CHECKLIST

Aerial Recovery will undertake reasonable due diligence of donors, to ensure they don't hold views or are involved in activities that might be incompatible with Aerial Recovery's Values, Code of Conduct, mission, vision and charitable objectives. Aerial Recovery is acutely aware of the need to protect the organization and its Members, staff and volunteers reputations. In terms of donations, Aerial Recovery will ensure that any gift over \$100,000 is safe to accept and, doing so, would be in the best interests of the charity.

Aerial Recovery will also consider issues, such as suspicious donations, managing large anonymous gifts, or donations from vulnerable individuals.

BASIC COMPLIANCE CHECKLIST.

- **Legal Check:** Aerial Recovery will endeavor to only accept donations that comply with the Fundraising Code and relevant laws, such as anti-money laundering or sanctions.
- **Reputation Check:** Aerial Recovery will assess potential impact on the organization's reputation. For example, the donor's public image and any past controversies.
- **Ethics Check:** Aerial Recovery will verify alignment with the charity's mission and values.
- **Risk Check:** Aerial Recovery will identify and manage potential risks associated with the donation, such as the financial stability of the donor, if a pledge is to be paid over several years.
- **Transparency Check:** Aerial Recovery will demonstrate transparency and accountability in fundraising practices. For example, by disclosing the source and amounts of large donations, as long as this doesn't violate any privacy laws or agreements with the donor.

If there may be any risk in terms of Aerial Recovery working with individuals who have been placed on any 'Designated Persons' or sanctions lists, Aerial Recovery will conduct the below checks:

ADDITIONAL BASIC CHECKS - ORGANIZATIONS

- If they have a website, check that what they're proposing fits with what's on there. If available, review what it says about key members of their team and, download and review, their annual report/accounts.
- Carry out an internet search. On the company, charity, or, if applicable, and key individuals, to see if there is anything of concern. Aerial Recovery will not only check the first page aware that older issues may be sufficiently serious to still be relevant.
- Aerial Recovery will aim to speak to someone who has worked with them or knows their sector well. Phone calls are best, as people tend to be more open.
- Aerial Recovery will seek references, if appropriate.
- Any conflicts of interest that have been identified will be managed in accordance with Aerial Recovery's Conflict of Interest Policy.

Depending on the nature, location of a project, program, initiative or operational mission - and the degree of risk - applicable additional checks should be carried out, using the framework below.

Ethics - activities that are illegal or incompatible with Aerial Recovery's Values. Issues such as corruption/bribery, criminal activities, discrimination, exploitation of people, or the environment, or involvement with radical groups, or companies, regimes, products or services that conflict with Aerial Recovery's charitable aims/values.

- Aerial Recovery will confirm that there are adequate safeguarding procedures in place and that they are being consistently applied to ensure vulnerable people are kept safe from harm.
- For large organizations, compliance with Acts such as those listed in *Appendix A*
- If suspicions trigger an appropriate checks to be conducted on a potential 'Designated Persons' (see definition in *Appendix B*) and/or 'Designated Organizations and Individuals' defined as "Foreign Terrorist Organizations (FTOS)" or "Specially Designated Global Terrorists (SDGTS)" based on established legal criteria (See *Appendix C*). These checks can be performed by visiting The U.S. Department of State and The U.S. Department of the Treasury websites as these departments regularly update and publish lists of designated entities and individuals on their respective websites.

Donations -Aerial Recovery will consider issues, such as *suspicious donations* such as, managing large anonymous gifts, or those from vulnerable individuals. (see *Appendix D* for a checklist that helps define what should be considered a *suspicious donation*)

Compliance - significant breaches of regulatory or other frameworks, investigations by government agencies/police, court cases, debt default, or disqualifications.

- Aerial Recovery will check with any relevant regulator for reports or other information that might be available.

- Aerial Recovery will confirm registration with any relevant country regulatory body or other trade/professional bodies with the aim of ensuring that any licenses, registration requirements, qualifications or insurances are held and in-date.
- For donors - potentially 'Tainted Charity Donations' which refer to donations made to charitable organizations that are tainted or associated with improper or illegal activities. These activities may include money laundering, terrorist financing, fraud, or other criminal conduct.

Finance – If there are risks of takeover, sustained annual operating losses, level of leverage (debt) too high for their sector, bad credit risk, liquidity (cash flow) issues, weak asset base, unusual, related party or intercompany transactions, or significant amounts of capital being taken out of company, adverse comments by auditors, court judgements, significant recent debt restructuring/profit warnings or redundancies then enhanced due diligence will be required prior to further engagement.

Ability to Deliver - capacity to deliver services/products, track record in delivery, security around key staff (e.g., a small company relying on a single individual), any supply chain issues (e.g., reliance on shipments from overseas), or an organization that has operated in only a single area delivering in an entirely new one.

- Aerial Recovery will check during negotiations and take up references specifically covering any areas of concern.

Reputational Risk – any potential negative media attention, or concerns from other funders/partners from being associated with this company/individual.

Contracts - Aerial Recovery will check that the balance between the costs, benefits and liabilities is fair, and there are no onerous or unreasonable obligations.

Conflicts of Interest - Aerial Recovery will ensure that its' conflict-of-interest policy is complied with.

Additionally, the charitable sector is driven by passion and funding is significantly challenging for many organization's and so it is important to be aware that there is a risk of 'urgent need' clouding thinking. Fundraisers and project leaders may well be best placed to carry out due diligence. However, their findings should be reviewed and approved by someone with the necessary experience and seniority, who is also sufficiently and demonstrably distant from the issue.

Contracts/Agreements – deliverables wholly charitable in nature, clearly specified (quantity/quality/timescale), clear monitoring and reporting throughout and at end of project, with provision to cancel/claw back funding, if necessary.

INDIVIDUALS

There may be circumstances where Aerial Recovery may consider it appropriate to check individuals. There are a variety of checks that could be carried out, including if someone:

- is currently declared bankrupt (or is subject to bankruptcy restrictions or an interim order) or has an individual voluntary agreement (IVA) with creditors (see *Appendix E* for suggestions on how to conduct public searches)
- is disqualified from being a company director (See *Appendix F*)
- has previously been removed as a Board Member by a charity regulatory body due to misconduct or mismanagement.
- Is listed on any USA Registers of court or other judgements

Gift Acceptance & Other Fundraising Policies

Aerial Recovery will not accept funding from a donor where it would not be in the best interests of the charity. For example, if a donor wanted to fund something outside of our charitable objects, or to impose unreasonable conditions or who may be a vulnerable individual or lack competence to make decisions.

Fundraising Due Diligence - Other Than Donors

Fundraising due diligence is not something that applies only to donors. For example, when working with commercial fundraising companies Aerial Recovery will carry out appropriate due diligence to ensure that any companies fundraising on the charity's behalf are operating in line with this Ethical Fundraising Policy and have appropriate oversight and training.

Fundraising Due Diligence – Incident Reporting

In the event Aerial Recovery's due diligence was to uncover a significant problem, the organization would be mindful of its obligations to report major incidents to the appropriate regulatory bodies.

Due Diligence - Anonymous Donations, Sanctions & Scams

When carrying out donor due diligence, Aerial Recovery will be mindful that charities are at risk from attempts to breach sanctions and scams and, donations from anonymous donors, may pose a particular risk. Outlined below are how these should be managed, with additional helpful resources found in *Appendix G*.

Donor Due Diligence - Anonymous and Suspicious Donations

Donations through collection tins and online platforms are often anonymous and any donor may remain anonymous if he or she chooses to. The Charity Commission 'know your' donor principle does not mean Aerial Recovery cannot accept anonymous donations and doing so is perfectly acceptable providing charities look out for suspicious circumstances and put adequate safeguards in place.

The CEO and the Board will take reasonable and appropriate steps to know who the charity's donors are and will not accept a donation where the risk to the charity is assessed to be greater than the benefit of having the funds donated.

Fundraising Donor Due Diligence - Sanctions

This is a complex area as the sanctions applied can be to individuals, organizations or even countries, the sanctions applied vary and other countries also apply sanctions.

It is against the law to receive money, goods or economic resources from, or send these to – an individual or organization subject to financial sanctions. For resources that can be valuable for charities when seeking guidance and support in implementing effective due diligence, monitoring, and verification processes to protect their funds and fulfill their mission effectively, especially in regards to checking if a country or individual is on a sanctions list, see *Appendix H*.

How Can the Charity's CEO & Board Identify Suspicious Donations?

There can be no absolute guide to what may be suspicious, but indicators are where significant sums are being donated, particularly if this is unusual, in cash or from overseas. Moreover, any prospective donor who wishes cash to be forwarded in advance or for the charity to pay some of the donation to a third party will always be considered highly suspicious.

Suspicious Fundraising Donations Checklist

The following situations may indicate higher risks:

- Unusual or substantial (100K+ USD Donations), one-off donations or a series of smaller donations or interest-free loans from sources that cannot be identified or checked.
- Being asked to act as a conduit for the passing of a donation to a second body which may or may not be another charity.
- If conditions attached to a donation mean that the charity would merely be a vehicle for transferring funds from one individual or organization to another without the CEO & the Board being able to satisfy themselves that these have been properly used.
- Where a charity is told it can keep a donation for a certain period of time, perhaps with the attraction of being able to keep any interest earned whilst holding the money, but the principal sum is to be returned at the end of a specified, short, period.
- Where donations are made in a foreign currency, and again unusual conditions are attached to their use, e.g. including a requirement that the original sum is to be returned to the donor in a different currency.

- Where donations are conditional on particular individuals or organizations being used to do work for the charity where the Board may have concerns about those individuals or organizations.
- Where a charity is asked to provide services or benefits on favorable terms to the donor or a person nominated by the donor.

FUNDRAISING DONOR DUE DILIGENCE - COMPLIANCE CHECKLISTS

Listed below are the fundraising donor due diligence compliance checklists and guidance from the Charity Commission E&W and other regulators.

Additional helpful resources can be found in *Appendix G*.

APPENDIX A

FEDERAL LAWS AND INITIATIVES AIMED AT COMBATING HUMAN TRAFFICKING AND MODERN SLAVERY:

1. **Trafficking Victims Protection Act (TVPA):** Enacted in 2000 and subsequently reauthorized, the TVPA is the primary federal law addressing human trafficking. It provides measures to prevent trafficking, protect victims, and prosecute traffickers. The TVPA has been reauthorized several times, most recently in 2017.
2. **The Victims of Trafficking and Violence Protection Act (VTVPA):** This law, passed in 2000 as part of the TVPA, created the T visa, which allows victims of human trafficking to remain in the United States temporarily if they assist law enforcement in the investigation or prosecution of trafficking crimes.
3. **The Federal Acquisition Regulation (FAR) Rule on Combating Trafficking in Persons (TiP):** This rule, implemented in 2015, prohibits U.S. government contractors and subcontractors from engaging in trafficking-related activities and requires them to take specific preventive measures.
4. **The Frederick Douglass Trafficking Victims Prevention and Protection Reauthorization Act of 2018:** This law reauthorized various federal programs and initiatives aimed at combating trafficking and supporting victims.

APPENDIX B

DEFINITION OF DESIGNATED PERSONS

In the context of sanctions, especially regarding compliance and enforcement, the concept of "designated individuals" or "designated parties" is frequently used in the United States. These designations typically arise in the context of sanctions programs administered by the Office of Foreign Assets Control (OFAC), which is a part of the U.S. Department of the Treasury.

Here's how the concept of "designated individuals" works in the context of U.S. sanctions:

1. **Specially Designated Nationals (SDNs):** These are individuals, groups, entities, and governments with whom U.S. persons are generally prohibited from engaging in transactions under various economic sanctions programs. SDNs are designated by OFAC and listed on the SDN List. The SDN List includes terrorists, narcotics traffickers, weapons proliferators, and other individuals and entities deemed to pose a threat to U.S. national security or foreign policy interests.

2. **Blocked Persons or Entities:** U.S. persons are prohibited from engaging in any transactions with individuals or entities whose property and interests in property are blocked pursuant to OFAC sanctions regulations. These individuals or entities are often referred to as "blocked persons" or "blocked parties."
3. **Foreign Terrorist Organizations (FTOs):** These are organizations designated by the U.S. Secretary of State as foreign terrorist organizations. Financial institutions are generally prohibited from engaging in transactions with FTOs or their members.
4. **Specially Designated Global Terrorists (SDGTs):** These are individuals and entities designated by OFAC as SDGTs due to their involvement in terrorist activities or support for terrorism. Transactions with SDGTs are generally prohibited.
5. **Other Designated Individuals or Entities:** Besides OFAC-administered sanctions programs, other U.S. government agencies may also designate individuals or entities for various reasons, such as export control violations, human rights abuses, or corruption. These designations may result in similar prohibitions on transactions with the designated parties.

These designations play a crucial role in U.S. sanctions enforcement efforts and are aimed at isolating sanctioned individuals and entities from the U.S. financial system and economy. U.S. persons, including individuals and entities subject to U.S. jurisdiction, are required to comply with OFAC sanctions regulations and are prohibited from engaging in transactions involving designated individuals and entities, absent specific authorization or an applicable exemption.

APPENDIX C

DESIGNATING SPECIFIC ORGANIZATIONS AND INDIVIDUALS AS "FOREIGN TERRORIST ORGANIZATIONS (FTOS)" OR "SPECIALLY DESIGNATED GLOBAL TERRORISTS (SDGTS)" BASED ON ESTABLISHED LEGAL CRITERIA.

1. Foreign Terrorist Organizations (FTOs): These are organizations designated by the U.S. Secretary of State as foreign terrorist organizations under Section 219 of the Immigration and Nationality Act (INA). To be designated as an FTO, an organization must meet the following criteria:

- It must be a foreign organization.
- It must engage in terrorist activity or terrorism, or retain the capability and intent to engage in terrorist activity or terrorism.

- Its terrorist activity or terrorism must threaten the security of U.S. nationals or the national security (national defense, foreign relations, or the economic interests) of the United States.

Once designated as an FTO, the organization is subject to various legal consequences, including criminal penalties for individuals providing material support or resources to the organization.

2. Specially Designated Global Terrorists (SDGTs): These are individuals and entities designated by the U.S. Department of the Treasury under Executive Order 13224 as SDGTs due to their involvement in or support for terrorism. The criteria for SDGT designation include:

- Being designated as a terrorist or terrorist supporter by the U.S. government or the United Nations Security Council.
- Engaging in, supporting, or facilitating terrorist acts or providing financial, material, or technological support to terrorist groups or acts of terrorism.

SDGT designation imposes financial and other sanctions on designated individuals and entities, including asset freezes and prohibitions on transactions with U.S. persons.

While there isn't a comprehensive list of all organizations designated as FTOs or individuals designated as SDGTs, the U.S. Department of State and the U.S. Department of the Treasury regularly update and publish lists of designated entities and individuals on their respective websites. These lists include organizations such as al-Qaeda, ISIS (Islamic State of Iraq and Syria), Hezbollah, and many others.

APPENDIX D

SUSPICIOUS DONATIONS CHECKLIST

How can trustees identify suspicious donations?

The key to identifying suspect donations is to look out for exceptional features, such as unusually large amounts, conditions or complex banking and transfer arrangements, or a donation which in reality is some kind of loan.

Unsolicited donations might be suspect, particularly if the trustees are unable to satisfy themselves about the credentials of the people involved, or the appropriateness of the

donation or loan. Donations may take forms other than money, for example shares or goods. Trustees should, of course, remember that the donor might be entirely legitimate, but they should not rule out the possibility that somebody is trying to exploit the charity.

The following situations may indicate higher risks:

- unusual or substantial one-off donations or a series of smaller donations or interest-free loans from sources that cannot be identified or checked by the charity
- where a charity is asked to act as a conduit for the passing of a donation to a second body which may or may not be another charity
- if conditions attached to a donation mean that the charity would merely be a vehicle for transferring funds from one individual or organisation to another without the trustees being able to satisfy themselves that they have been properly used
- where a charity is told it can keep a donation for a certain period of time, perhaps with the attraction of being able to keep any interest earned whilst holding the money, but the principal sum is to be returned at the end of a specified, short, period
- where donations are made in a foreign currency, and again unusual conditions are attached to their use, eg including a requirement that the original sum is to be returned to the donor in a different currency
- where donations are conditional on particular individuals or ORGANIZATIONS being used to do work for the charity where the trustees have concerns about those individuals or ORGANIZATIONS
- where a charity is asked to provide services or benefits on favourable terms to the donor or a person nominated by the donor

APPENDIX E

BANKRUPTCY AND INSOLVENCY PUBLIC SEARCH OPTIONS (INDIVIDUALS)

In the United States, bankruptcy filings are a matter of public record, and there are several ways to search for bankruptcy and insolvency information:

1. **PACER (Public Access to Court Electronic Records):** PACER is the federal courts' electronic public access system that allows users to obtain case and docket information from federal appellate, district, and bankruptcy courts. Users can search for bankruptcy filings by case number, party name, or other criteria. PACER charges a small fee for accessing documents and docket information.
2. **Bankruptcy Court Websites:** Many bankruptcy courts have their own websites where users can search for bankruptcy case information. These websites may offer online search tools or provide instructions on how to access bankruptcy records in person or through other means.
3. **Third-Party Services:** There are third-party websites and services that offer access to bankruptcy records and information for a fee. These services may provide more user-friendly search interfaces or additional features compared to PACER.
4. **Credit Reporting Agencies:** Credit reporting agencies like Equifax, Experian, and TransUnion may include information about bankruptcy filings in credit reports. Individuals can request their own credit reports or use credit monitoring services to access this information.
5. **Local Public Records Offices:** In some cases, bankruptcy filings may be available through local public records offices or county clerk's offices. However, availability and access methods may vary depending on the jurisdiction.

It's important to note that bankruptcy records typically contain sensitive financial information, and access to these records may be subject to certain restrictions or privacy laws. Additionally, while bankruptcy filings are public records, accessing and using bankruptcy information for improper purposes may be prohibited by law.

APPENDIX F COMPANY DIRECTOR DISQUALIFICATIONS

In the United States, searching for public records related to company director disqualifications can vary depending on the jurisdiction and the type of disqualification. Here are some general steps you can take to search for this information:

1. **State Business Registry:** Each state maintains a business registry or secretary of state website where you can search for information about registered businesses, including their directors and officers. You can typically search by the name of the company to find information about its directors.
2. **Federal Agencies:** Certain federal agencies, such as the Securities and Exchange Commission (SEC) or the Federal Trade Commission (FTC), may maintain databases or records related to company directors, particularly in cases involving securities fraud or violations of federal laws.
3. **Court Records:** If a company director has been disqualified by a court order, you may be able to find information about the disqualification in court records. Many courts provide online access to case dockets and documents, which you can search using the director's name or the name of the company.
4. **Public Notices:** In some cases, director disqualifications may be announced or published in local newspapers, trade publications, or other public notices. Searching online archives or databases of these publications may provide information about disqualifications.
5. **Third-Party Services:** There are third-party services and databases that compile public records information, including information about company directors and officer disqualifications. These services may offer more comprehensive search capabilities or provide alerts for new disqualifications.
6. **Professional Licensing Boards:** If the director holds a professional license, such as a license to practice law or accounting, you may be able to search for disciplinary actions or disqualifications through the relevant licensing board or agency.

It's important to note that accessing certain types of public records, such as court records or disciplinary actions, may require you to pay a fee or visit the relevant government office in person. Additionally, the availability and accessibility of public records may vary depending on the jurisdiction and the specific circumstances of the case.

APPENDIX G

Here are some helpful links to websites and resources in the USA that provide guidance and tools for protecting charities from harm, specifically focusing on due diligence, monitoring, and verifying the end use of charitable funds:

1. Internal Revenue Service (IRS):

- **Charities & Non-Profits:**

- Website: IRS Charities & Non-Profits
- Description: The IRS provides resources and guidance for tax-exempt organizations, including information on compliance, governance, and financial management. This includes resources on due diligence, monitoring, and reporting requirements for charities.

2. National Council of Nonprofits:

- **Resource Library:**

- Website: National Council of Nonprofits - Resource Library
- Description: The National Council of Nonprofits offers a comprehensive resource library with articles, guides, templates, and tools covering various topics related to nonprofit management and governance, including financial oversight and risk management.

3. Guidestar:

- **Nonprofit Directory:**

- Website: [Guidestar Nonprofit Directory](#)
- Description: Guidestar is a leading source of information on nonprofit organizations. Their nonprofit directory allows users to search for charities and access information on their finances, governance, and programs. It can be useful for conducting due diligence on potential partners or recipients of charitable funds.

4. Better Business Bureau Wise Giving Alliance (BBB WGA):

- **Standards for Charity Accountability:**

- Website: BBB WGA Standards for Charity Accountability
- Description: BBB WGA sets standards for charity accountability, governance, and transparency. Their website provides information on best practices for nonprofits, including guidelines for due diligence, monitoring, and reporting on the use of charitable funds.

5. **Association of Certified Fraud Examiners (ACFE):**

- **Fraud Resources for Nonprofits:**

- Website: ACFE Fraud Resources for Nonprofits
- Description: ACFE offers resources and guidance for nonprofits on fraud prevention, detection, and investigation. Their website includes articles, case studies, and tools specifically tailored to the needs of nonprofit organizations.

6. **Nonprofit Risk Management Center:**

- **Resources & Publications:**

- Website: Nonprofit Risk Management Center Resources
- Description: The Nonprofit Risk Management Center provides resources, publications, and training on risk management practices for nonprofit organizations. Their website offers articles, guides, and webinars on financial oversight, due diligence, and monitoring of charitable funds.

APPENDIX H

These resources can be valuable for charities seeking guidance and support in implementing effective due diligence, monitoring, and verification processes to protect their funds and fulfill their mission effectively.

To check if a country or individual is on a sanctions list, you can follow these steps:

1. **Consult Official Government Websites:** Government agencies responsible for imposing sanctions typically maintain official lists of sanctioned countries, entities, and individuals. For example:
 - In the United States, you can check the Treasury Department's Office of Foreign Assets Control (OFAC) website for lists of sanctioned countries, entities, and individuals.
 - In the European Union, you can consult the website of the European External Action Service (EEAS) for information on EU sanctions.
2. **Use Online Tools and Databases:** There are online tools and databases that compile and consolidate information from various government sources, making it easier to search for individuals and entities subject to sanctions. Examples include:

- OFAC's Sanctions List Search: Allows users to search for individuals and entities on OFAC's sanctions lists.
 - The Consolidated List of Financial Sanctions Targets: Maintained by the UK's Office of Financial Sanctions Implementation (OFSI), this database includes individuals and entities subject to UK financial sanctions.
3. **Check International Organizations' Websites:** International organizations such as the United Nations Security Council may impose sanctions on countries, entities, and individuals. You can check their websites for information on sanctions regimes and designated individuals:
 - United Nations Security Council Sanctions Lists: Provides information on individuals, groups, and entities subject to UN sanctions.
 4. **Consult Legal and Compliance Professionals:** Legal and compliance professionals who specialize in sanctions compliance can provide guidance and assistance in determining whether a country or individual is subject to sanctions.
 5. **Subscribe to Updates and Alerts:** Many government agencies and third-party providers offer subscription services to receive updates and alerts about changes to sanctions lists. This can help you stay informed about new designations and updates to existing sanctions regimes.

When conducting checks for sanctions lists, it's important to ensure that you're using reliable and up-to-date sources of information, as sanctions lists can change frequently due to updates, additions, and removals of individuals and entities. Additionally, compliance with sanctions laws and regulations may vary depending on your jurisdiction and the specific circumstances of your business or activities. If you have any doubts or concerns, it's advisable to seek guidance from legal or compliance professionals.



ETHICAL FUNDRAISING & DUE DILIGENCE

POLICY AGREEMENT

I, _____ (*insert full legal name of Board Member, contractor, employee or volunteer*) hereby confirm that I have read and understood 'Aerial Recovery's Ethical Fundraising & Due Diligence Policy' as well as Aerial Recovery's 'Values', 'Code of Conduct Policy' and 'Misconduct and Disciplinary Policy & Procedures'. I agree to adhere to these policies. I understand that if I violate any of these policies I will be subject to disciplinary actions as detailed in *Aerial Recovery's Misconduct and Disciplinary Policy and Procedures*.

(Signature)

(Date)