

## Donor Due Diligence & KYC Process Statement

Version 1.0

Policy Owner	Board of Directors / Management
Last Reviewed	May 2026
Next Review Date	May 2027
Review Cycle	Annually or upon regulatory changes

### 1. Purpose & Scope

**Smiling Gecko Singapore Limited (UEN 202452207M)** is committed to maintaining the highest standards of governance, transparency, and integrity in all its fundraising activities. This policy establishes the framework for donor due diligence to:

- Prevent the Organisation from being used, knowingly or otherwise, as a vehicle for financial crimes, including money laundering and terrorism financing;
- Comply with Singapore's Charities Act, the Corruption, Drug Trafficking and Other Serious Crimes (Confiscation of Benefits) Act (CDSA), and guidelines from the Commissioner of Charities (COC);
- Protect the reputation and integrity of SGSL and its beneficiaries;
- Ensure donor gifts are accepted in line with the Organisation's mission and values.

This policy applies to all donations — monetary and in-kind — received from individual donors, corporate donors, foundations, and any other third-party sources, regardless of donation amount or channel.

### 2. Legal & Regulatory Framework

SGSL operates under the following key regulatory obligations in Singapore:

Regulation / Authority	Obligation	Relevance to SGSL
CDSA (Cap. 65A)	Report suspicious transactions; do not accept proceeds of crime	Applies to all donations received
PDPA (Personal Data Protection Act)	Protect donor personal data collected during KYC	Governs data handling & retention

### 3. Risk-Based Approach

SGS adopts a risk-based approach to donor screening, recognising that not all donors carry the same level of risk. The level of due diligence applied is proportionate to the assessed risk associated with each donor relationship.

#### 3.1 Risk Categories

Risk Level	Donor Profile	Due Diligence Level	Review Frequency
LOW	Singapore resident individual, verified identity, donation < S\$5,000, no adverse indicators	Standard (Simplified Due Diligence)	Annual Review
MEDIUM	Corporate donor (local); donations S\$5,000 – S\$50,000; foreign individual donor	Enhanced Standard Due Diligence	Annual review
HIGH	Politically Exposed Person (PEP); anonymous or cash donations; foreign corporates; donation > S\$50,000	Enhanced Due Diligence (EDD)	Before acceptance; 6-monthly review

#### 3.2 Automatic Escalation Triggers

Any of the following automatically triggers Enhanced Due Diligence regardless of donation amount:

- Donor is a Politically Exposed Person (PEP) or close associate of a PEP;
- Donation is made in cash or through unusual payment methods;
- Donor requests anonymity without plausible reason;
- Donation originates from a high-risk jurisdiction;

## 4. KYC Screening Process

### 4.1 Individual Donors

#### Standard Due Diligence (Low Risk)

- Full legal name and NRIC/Passport number;
- Contact information (email address and/or phone);
- Source of donation (e.g. personal savings, employment income)

#### Enhanced Due Diligence (High Risk / PEP)

- All Standard Due Diligence information, plus:
  - Certified copy of identification document;
  - Proof of source of funds (e.g. bank statement, payslip);
  - Written declaration of purpose of donation;
  - Board approval required before acceptance.

### 4.2 Corporate & Institutional Donors

#### Standard Due Diligence

- Full legal name and UEN (Unique Entity Number) / company registration number;
- Registered address and nature of business;
- Name(s) of authorised signatory / representative;
- Screening against sanctions and adverse media lists.

#### Enhanced Due Diligence (Foreign Corporates / High Risk)

- Certified Certificate of Incorporation or equivalent;
- Source of funds documentation;
- Board of Directors resolution authorising the donation;
- Board approval required before acceptance.

## 5. Donation Acceptance & Refusal

### 5.1 Donations SGSL Will NOT Accept

SGSL reserves the right to decline or return any donation where:

- The donor cannot be satisfactorily identified after reasonable efforts;
- The donor is listed on a sanctions or terrorist designation list;
- The donation is suspected to be proceeds of criminal activity;
- Accepting the donation would create a conflict of interest or reputational risk;

- The donor imposes conditions incompatible with SGS's mission or values;
- The donation is anonymous and exceeds S\$3,000 in value.

## 5.2 Anonymous Donations

Amount Threshold	Policy	Condition
Up to S\$3,000	Acceptable with standard receipting	Must be via traceable channel (bank transfer, credit card)
S\$3,001 – S\$20,000	Acceptable with donor disclosure to Executive Director	Donor must provide written justification for anonymity
Above S\$20,000	Not accepted anonymously	Donor identification is mandatory; no exceptions

## 5.3 Cash Donations

SGS discourages cash donations to reduce risk. Where cash is received:

- Maximum single cash donation accepted: S\$1,000;
- All cash donations must be receipted immediately and deposited within 24 hours;
- Two staff members must be present when counting cash donations;
- Cash donations above S\$500 require donor identification.

## 6. Roles & Responsibilities

Role	Responsibility	Authority
Board of Directors	Approve policy; receive reports on declined donations	Final authority on high-risk donations
Executive Director	Day-to-day policy implementation; approve medium-risk donations; escalate high-risk cases to Board	Approve donations up to S\$50,000 (medium risk)
Programme / Development Staff	Collect donor information; apply intake checklist; flag	Flag and escalate suspicious transactions

	unusual requests; Conduct screening; maintain KYC records; monitor for suspicious activity	
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## 7. Record Keeping

SGSL maintains the following records:

- KYC documentation (identification, beneficial ownership, source of funds) — minimum 5 years from end of donor relationship;
- Donation receipts and transaction records — minimum 5 years;
- Screening results and rationale for acceptance or rejection — minimum 5 years;

All KYC records are stored securely, access-restricted, and handled in accordance with the Personal Data Protection Act (PDPA). Data is not shared with third parties without consent, except where required by law.

## 8. Policy Review

This policy will be reviewed:

- Annually by the Board of Directors;
- Immediately upon significant changes to Singapore law or COC guidelines;

## Appendix A — Donor Intake Checklist

Checklist Item	Completed	N/A
Donor full name / entity legal name recorded	<input type="checkbox"/>	<input type="checkbox"/>
NRIC/Passport / UEN verified and copied	<input type="checkbox"/>	<input type="checkbox"/>
Contact details obtained	<input type="checkbox"/>	<input type="checkbox"/>
Source of donation declared	<input type="checkbox"/>	<input type="checkbox"/>
UBO identified (corporate donors)	<input type="checkbox"/>	<input type="checkbox"/>
Adverse media search conducted	<input type="checkbox"/>	<input type="checkbox"/>

Risk level assessed (Low / Medium / High)	<input type="checkbox"/>	<input type="checkbox"/>
Board/ED approval obtained (Medium/High risk)	<input type="checkbox"/>	<input type="checkbox"/>
Donation acceptance decision documented	<input type="checkbox"/>	<input type="checkbox"/>
Donor receipt issued	<input type="checkbox"/>	<input type="checkbox"/>
Records stored securely per retention policy	<input type="checkbox"/>	<input type="checkbox"/>

## Disclaimer

This document is intended to outline the donor due diligence and screening practices adopted by Smiling Gecko Singapore Ltd. as part of its governance, transparency, and risk management framework.

The organisation adopts a risk-based approach and reserves the right to request additional information, documentation, or clarification from donors where deemed appropriate.

Smiling Gecko Singapore Ltd. may decline or return donations that do not meet its internal compliance, ethical, or risk assessment standards.

This policy may be updated periodically without prior notice.