

AEGC / Talent Incubation Hub (TIH)

Donor Anti-Money Laundering (AML) & Know Your Customer (KYC) Compliance Policy

All-Encompassing Global Consult Limited (AEGC)

Effective Date: December 4, 2025

Version: v01

1. Introduction

All-Encompassing Global Consult Limited (AEGC), through its flagship national initiative — the **Talent Incubation Hub (TIH)** — is committed to maintaining the highest standards of **financial integrity, legal compliance, and donor protection.**

This Donor AML/KYC Policy outlines the procedures we follow to prevent financial crimes, ensure transparency, and uphold global best practices, while protecting the interests of all stakeholders who support TIH's mission across Nigeria, Africa, and the world.

Our policy aligns with:

- Nigeria Financial Intelligence Unit (NFIU) directives
- SCUML AML regulations
- EFCC reporting frameworks
- FATF International AML Standards
- GDPR/UK Data Protection Act (for international contributors)
- International philanthropic compliance norms

Our only metric is integrity.

Our only outcome is an all-encompassed success.

2. Purpose of This Policy

This policy ensures that:

- AEGC/TIH does **not knowingly receive funds derived from illegal activity**.
- All donations, contributions, grants, and sponsorships are properly verified.
- Donors (individuals or institutions) are screened in line with global AML/KYC requirements.
- Full transparency is upheld for local and international financial partners.
- Zenith Bank GlobalPay and all integrated payment gateways meet regulatory readiness.

3. Scope of Application

This policy applies to:

- One-time donors
- Recurring donors
- Philanthropic sponsors
- Corporate donors
- International contributors
- Institutional partners (local and global)
- Grant providers
- Foundations supporting TIH

It covers **all currencies, all payment channels, and all platforms** associated with AEGC/TIH.

4. Information We Collect for AML/KYC Compliance

Depending on donation tier and applicable regulations, AEGC/TIH may request:

For Individual Donors

- Full name
- Email & phone number
- Residential address
- Government-issued ID (NIN Slip, Driver's License, Passport, Voter's Card)
- Proof of address (where applicable)
- Source of funds declaration (for high-value contributions)

- Tax Identification Number (TIN) for major philanthropic commitments

For Corporate Donors

- Registered company name
- RC/CAC Number
- Registered address
- Authorized representative details
- Corporate tax number
- Incorporation documents
- Ownership/Directorship details (where required)
- Source of funds statement

For International Donors

- Valid passport
- Proof of address
- Country-level AML/KYC compliance confirmation
- Additional documentation depending on jurisdiction
- OFAC/EU/UN sanctions list screening

5. Donor Due Diligence Process

AEGC follows a **risk-based approach**, as recommended by FATF and SCUML.

a. Standard Due Diligence

Applied to most donations:

- Basic donor identification
- Screening against anti-terrorism lists
- Verification of payment instrument authenticity

b. Enhanced Due Diligence (EDD)

Applied when:

- Donation exceeds regulatory thresholds
- Donor is politically exposed (PEP)
- Source of funds appears unusual
- Cross-border donations originate from high-risk jurisdictions

EDD includes:

- Additional ID verification
- Proof of income or source of funds
- Senior management approval prior to acceptance

If due diligence is unsatisfactory, AEGC reserves the right to **decline or refund** the donation.

6. Prohibited Transactions

AEGC will not accept:

- Funds derived from illegal activity
- Donations from sanctioned individuals or entities
- Contributions intended to obscure illicit financial origins
- Anonymous or unverifiable donations above regulatory limits

AEGC adheres strictly to **EFCC, CBN, NFIU, and FATF reporting obligations.**

7. Data Protection & Confidentiality

All donor data collected for AML/KYC purposes is:

- **Encrypted, securely stored, and access-controlled**
- Processed under **GDPR Article 6(1)(c)** (legal obligation) and NDPA in Nigeria
- Never sold, rented, or shared for non-compliance-related reasons

Retention:

- Donor AML/KYC data is retained for **5–7 years**, depending on regulatory requirements.

8. Reporting of Suspicious Activity

AEGC is legally obligated to:

- File Suspicious Transaction Reports (STRs)
- File Currency Transaction Reports (CTRs), where applicable
- Engage with SCUML, NFIU, EFCC, and international financial bodies

Donors will **not** be notified when such reports are filed, in line with AML secrecy laws.

9. Donor Rights & Responsibilities

Donors Have the Right To:

- Know why their information is collected
- Request access to their stored data
- Ask for correction of inaccurate information
- Withdraw consent (where allowed by law)

Donors Are Responsible For:

- Providing accurate and truthful information
- Responding promptly to AML/KYC requests
- Not using the donation platform for illegal activity
- Acknowledging that non-compliance may result in donation reversal

10. Online Consent Requirement (for Website & Forms)

All donation channels must include the following mandatory consent checkbox:

"I agree to the Donor Privacy Policy & AML/KYC requirements, and I affirm that the information provided is accurate. I authorize All-Encompassing Global Consult Limited (AEGC) to verify my identity and source of funds for compliance purposes."

A donor **cannot proceed** without checking this box.

11. Policy Enforcement & Governance

This policy is overseen by:

- AEGC Compliance & Regulatory Office
- TIH Operations Governance Committee
- AEGC Executive Leadership

Breaches of AML/KYC procedures by internal staff carry disciplinary and legal consequences.

12. Contact Information

For AML/KYC inquiries:

 info@all-encompassingglobalconsult.com

For donation-related support:

 info@all-encompassingglobalconsult.com

13. Review Cycle

This policy will be reviewed annually or when:

- AML laws change
- Partner banks (e.g., Zenith GlobalPay) impose updates
- TIH expands into new geographic regions

Last updated: December 4, 2025

 ***All-Encompassing for an All Encompassed Success — As the Only Outcome.***