

Maasai Education Foundation Office of Foreign Asset Control (OFAC) Compliance Policy

Adopted 8 April 2017

“The Office of Foreign Assets Control (OFAC) of the US Department of the Treasury administers and enforces economic and trade sanctions based on US foreign policy and national security goals against targeted foreign countries and regimes, terrorists, international narcotics traffickers, those engaged in activities related to the proliferation of weapons of mass destruction, and other threats to the national security, foreign policy or economy of the United States. OFAC acts under Presidential national emergency powers, as well as authority granted by specific legislation, to impose controls on transactions and freeze assets under US jurisdiction. Many of the sanctions are based on United Nations and other international mandates, are multilateral in scope, and involve close cooperation with allied governments.” Because most of the Maasai Education Foundation’s (Foundation) activities will occur in Tanzania, a foreign country subject to OFAC regulations, the Foundation will undertake the following activities to ensure compliance with current and future OFAC requirements:

1. When the Foundation conducts activities in foreign countries (Tanzania), it will check the OFAC Sanctions Search List (<https://sanctionssearch.ofac.treas.gov/>) for names of individuals and entities with whom the Foundation is considering activities to determine if they are included on the list.

Note: As of 8 April 2017, there are only two individuals/entities on the OFAC Sanctions Search List in Tanzania. They are Al-Haramain: Tanzania Branch (and numerous aliases) and the Hassan Drug Trafficking Organization (AKA Hassan DTO and Shkuba DTO).

2. The Foundation will not conduct activities with individuals and entities on the OFAC blocked list.
3. The Foundation will not conduct activities with individuals and entities unless they sign the Foundation OFAC Compliance Policy Agreement stating that they will not conduct activities with OFAC designated nationals and blocked persons/entities.
 - a. The OFAC Compliance Policy Agreement contains instructions on how to determine if an individual or entity is on the OFAC blocked list and requires the grantee to develop a list of proposed individuals and entities that the grantee will conduct business with.
 - b. The Foundation requires receipts for all Foundation supported expenditures and will audit the records and receipts of all grantees distributing funds to other individuals or entities once per year to assess compliance with OFAC requirements and to ensure that all funds are used for charitable activities.
 - c. The Foundation will spot check receipts received throughout the year from foreign sources to ensure that OFAC and charitable activity requirements are being met.
 - d. If an individual or entity involved in Foundation activities fails to comply with OFAC and/or charitable activity requirements, the Foundation will cease activities with the individual or entity.
4. The Foundation will not engage in any export activities requiring OFAC licenses and registration.
5. The Foundation will comply with all United States statutes, executive orders, and regulations that restrict or prohibit U.S. persons from engaging in transactions and dealings with designated countries, entities, or individuals, or otherwise engaging in activities in violation of economic sanctions administered by OFAC.

