

1. Counter Terrorism & Anti Money Laundering Policy

2. Values Statement

RedR Australia (“RedR”) is guided by its values of accountability, integrity, empathy, and collaboration. RedR acknowledges the Australian government legislation that prohibits dealing with known terrorist organisations and/or prescribed person or entities. We acknowledge our obligations under these laws and therefore, across the organisation, will make all reasonable efforts to ensure that no fund or other resources are misappropriated or misdirected to support or further terrorist activities.

3. Purpose

The purpose of this policy is to guide all RedR Australia’s work to ensure that no funds or resources directly or indirectly support terrorist activities. The policy outlines RedR’s commitment to comply with all Australian laws pertaining to counter terrorism and anti-money laundering and processes in place to mitigate risk of money laundering or terrorism financing.

4. Scope

This policy applies to:

- All employees, volunteers, contractors, and interns/work placements of RedR
- Roster members and standby personnel.
- Associate trainers.
- RedR deployees.
- Board members.

5. Policy Statement and Principles

RedR will ensure all partner organisations are aware of this policy and understand all legal obligations to enable RedR to comply with relevant legislation and donor contractual requirements.

It is in our organisation’s best interest to know and prevent any support to known terrorist organisations. This policy is aligned with all other RedR policies and designed to be read in conjunction with them.

From a national perspective, it is informed by the Australian Government Counter-Terrorism Strategy and guided by the Attorney General’s Department’s ‘Safeguarding your organisation against terrorism financing: a guidance for non-profit organisations’.

From an international perspective, RedR Australia respects the UN Security Council Resolution 2664 (2022) which supports the delivery of humanitarian assistance for those in need while still advancing the Security Council’s mandate to maintain international peace and security.

For the purpose of this policy, ‘prescribed lists’ include:

- Australian Government Consolidated List which records persons or entities subject to financial sanctions and travel restrictions by the Australian Government
- Australian Government Listed Terror Organisations

- World Bank Listing of Ineligible Firms and Individuals.

Principles

RedR takes a zero-tolerance approach towards any association with terrorism or money laundering. All reasonable efforts (including due diligence and precautions) will be undertaken to ensure that resources do not assist, or otherwise support terrorist organisations, including the operatives that perform terrorist acts. We will be proactive in mitigating risks through the below procedures.

RedR Australia will also work appropriately to raise the issue of humanitarian carve outs to sanctions and other counter-terrorism requirements, to ensure the principles of humanity, impartiality and neutrality, remain guiding aims within our work and across the sector.

6. Procedures

This policy is embedded within our organisational culture and practices of RedR through the following areas.

Recruitment

To ensure that no applicant has engaged in terrorist activities or with terrorist organisations, RedR ensures that all applicants to the following positions are manually checked against the Prescribed Lists. If any links are found, the applicant will not continue to be considered for any engagement with RedR Australia.

- board members
- roster members
- deployees
- employees
- associate trainers
- interns
- volunteers
- contractors
- consultants

Partnerships

RedR will address the issue of anti-terrorism with partners during the development and revision stages of relevant Memorandums of Understanding (MoUs) and partner agreements. Where relevant, requirements relating to this issue will be noted in written agreements.

When conducting due diligence assessments on partner organisations, vendors or suppliers, RedR Australia will ensure Counter Terrorism and Anti Money Laundering procedures are in place and in use.

Investigation and Reporting

Any RedR personnel, partner organisations or other people external to RedR, who have a reasonable basis for suspecting money laundering or terrorism financing to have occurred, must report the suspected act immediately to the Chief Financial Officer, or the CEO.

Disclosures can be made in line with the processes and procedures outlined in the Ethics (Whistleblower) Policy or Grievances Policy, and RedR will thoroughly investigate any credible accusation of breaches of this policy.

Notifications will be made to any relevant Donor or Partner Organisation when RedR Australia is made aware of the following instances:

- Any personnel engaged with RedR Australia is listed on a prescribed list.
- Any associated personnel are subject to any proceedings or an informal process which could lead to listing on a prescribed list.

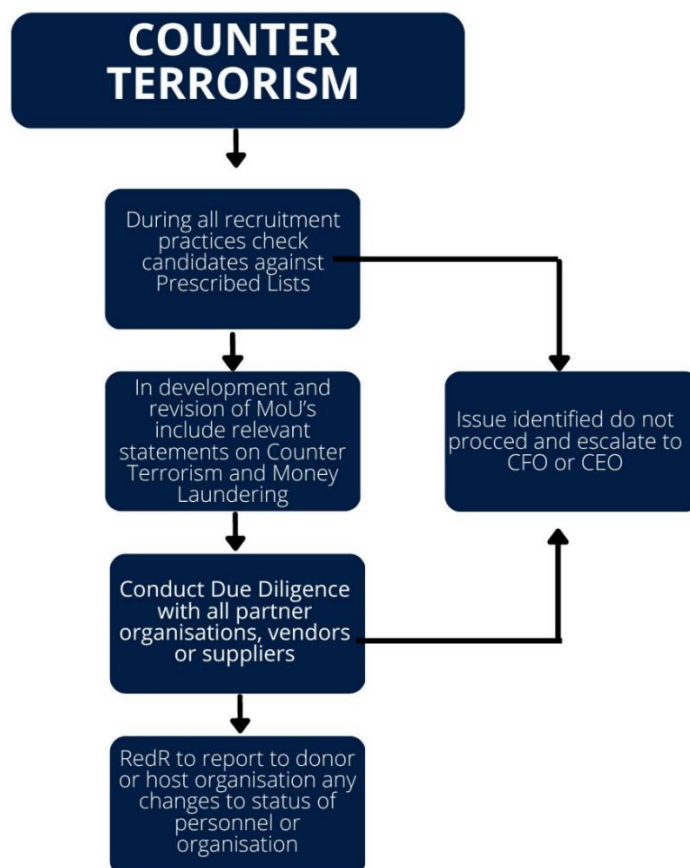
- RedR Australia is temporarily suspended from tendering for World Bank contracts by the World Bank, pending the outcome of a sanctions process;
- RedR Australia is temporarily suspended from tendering by a donor of development funding other than the World Bank;
- Any associated personnel or the organisation is the subject of an investigation (whether formal or informal) by the World Bank or another donor of development funding;
- Any associated personnel or the organisation is directly or indirectly engaged in, preparing, planning, assisting in or fostering the doing of a terrorist act;
- Any associated personnel or the organisation is directly or indirectly engaged in, preparing, planning, assisting in or fostering the doing of a terrorist act;
- Any associated personnel or the organisation is listed on the Criminal Cost Act List; and/or
- Any associated personnel or the organisation is listed on the Sanctions List.

7. Roles and Responsibilities

The RedR People and Capability Manager is responsible for ensuring the policy:

- Aligns with relevant legislation, government policy and /ACFID and RedR requirements/strategies/values.
- Is implemented and monitored.
- Is reviewed to evaluate its continuing effectiveness.

8. Flow Chart



9. Definitions

| | |
|-------------------------------|---|
| All reasonable efforts | Used to reflect the need for positive action and common-sense approach, based on the level of risk, to meet legal obligations and avoid inadvertently funding terrorist activity. |
| Assets | Funds and other resources of any kind, whether tangible or intangible, movable or immovable. |
| Counter terrorism | Any activity designed to prevent terrorism. |
| DFAT Consolidated List | Related to lists of suspected terrorists or supporters of terrorists including the: 'The Consolidated List' of all person and entities subject to targeted financial sanctions under United Nations Security Council decisions and maintained by DFAT pursuant to Regulation 40 to Charter of the United Nations (Dealing with Assets) Regulation 2008. 'List of Terrorist Organisations' – Organisations which have been proscribed by the Australian Government as terrorist organisations under the Criminal Code. |
| Money Laundering | The processing of the proceeds of crime to disguise their origins, making the funds appear to have been legitimately obtained. |
| Prescribed Lists | Collection of lists which include the Australian Government Consolidated List, Australian Government Listed Terror Organisations and World Bank List of Ineligible Firms and Individuals. |

10. Related Policies and Documents

RedR Code of Conduct
Ethics (Whistle Blower) Policy
Complaints Handling Policy

11. Document Control

| | |
|-----------------------|---------------|
| Reviewed by: | P&C Manager |
| Approved by: | CEO |
| Review date: | February 2024 |
| Next review: | February 2027 |
| Distribution: | External |
| Version number | 2.0 |