

Counter-Terrorism & Anti-Money Laundering Policy

1. Purpose

The purpose of this policy is to guide all of RedR Australia's (RedR) 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.

2. Scope

This policy applies to all RedR personnel:

- a. All employees, board members, volunteers, contractors and interns/work placements of RedR,
- b. RedR deployees, and
- c. Standby personnel/applicants
- d. Partner organisations
- e. Vendors and supplier.

3. Policy Statement

RedR acknowledges the Australian government legislation that prohibits dealing with known terrorist organisations and/or proscribed 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.

RedR will ensure all partner organisations are aware of and this policy and understand all legal obligation 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. It is informed by the Australian Government Counter-Terrorism Strategy¹ and guided by the Attorney General's Department's 'Safeguarding your organisation against terrorism financing: a guidance for non-profit organisations'²

4. Principles

RedR takes a zero tolerance approach towards any association with terrorism or money laundering. We will be proactive in mitigating risks through the below procedures.

¹ <https://www.nationalsecurity.gov.au/Media-and-publications/Publications/Documents/Australias-Counter-Terrorism-Strategy-2015.pdf>

² <https://www.homeaffairs.gov.au/criminal-justice/files/safeguarding-your-organisation-against-terrorism-financing-booklet.pdf>

5. Procedures

This policy is embedded within our organisational culture and practices in the following ways:

- Through the recruitment of roster members – all applicants to the roster are manually checked against the Prescribed Lists. This check is undertaken to ensure that no applicant has engaged in terrorist activities or have linked with identified terrorists or terrorist organisations. If links were found, the applicant would not continue to be considered for the roster.
- Through the recruitment of staff – all potential employees, interns and volunteers are manually checked against the prescribed lists.
- Through the engagement of contractors and consultants - all potential contractors and consultants are manually checked against the prescribed lists.
- All roster members and staff are checked against the prescribed terrorist lists whenever they are updated.
- RedR will address the issue of anti-terrorism with partners during the development of relevant Memorandums of Understanding (MoUs) and partner agreements. Where relevant, requirements relating to this issue will be noted in written agreements.
- References to this policy and associated procedures are incorporated into the development or revision of MoUs with key partners.
- Include counter-terrorism and anti-money laundering in due diligence assessments of new partner organisations, vendors or suppliers.
- Provide adequate training to relevant staff on counter-terrorism and anti-money laundering procedures.
- 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 Director, Finance or the CEO. Disclosures can be made in line with the processes and procedures outlined in the Whistleblower Policy or Complaints Handling Policy.
- RedR will thoroughly investigate any credible accusation of breaches of this policy.

6. Compliance, monitoring and review

The RedR P&C Director is responsible for ensuring the policy:

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

7. Definitions

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| 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. |
| Money Laundering | The processing of the proceeds of crime to disguise their origins, making the funds appear to have been legitimately obtained. |
| Prescribed Lists | <p>Related to lists of suspected terrorists or supporters of terrorists including the:</p> <p>‘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.</p> <p>‘List of Terrorist Organisations’ – Organisations which have been proscribed by the Australian Government as terrorist organisations under the Criminal Code.</p> |

8. Document control

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