

COUNTER-TERRORISM & ANTI MONEY LAUNDERING POLICY



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INTENT

LiteHaus International's Counter-Terrorism Financing and Anti-Money Laundering Policy is intended to promote the awareness and prevention of the support of terrorism. LiteHaus International seeks to prevent, detect and deter the deliberate or unknowing facilitation or support of terrorist groups or organisations, or individuals associated with terrorism and/or organisational crime. LiteHaus International acknowledges its obligations under both Australian laws and the laws in other countries in which we operate and is committed to ensuring that staff, partner organisations and sub-contractors adhere to this policy and related procedures to minimise the risk of support for individuals and organisations associated with terrorism.

STATEMENT OF POLICY

LiteHaus International is committed to taking all relevant measures to prevent the financing or support of terrorism or terrorist organisations. LiteHaus International will apply a risk-based approach to managing counter-terrorism financing and anti-money laundering, and will use all reasonable efforts to ensure that its development interventions comply with relevant Australian laws and the laws of any country LiteHaus International or partner organisations are operating in. LiteHaus International will make all partner organisations aware of, and understand the legal obligations so as to assist LiteHaus International comply with relevant legislation and donor contractual counterterrorism requirements.

DEFINITIONS

- **All reasonable efforts** is used to reflect the need for positive action and a common sense approach, based on the level of risk, to meet legal obligations and avoid inadvertently funding terrorist activity.
- **Assets** are funds and other resources that are very broadly defined as "asset of any kind, or property of any kind, whether tangible or intangible, movable or immovable".
- **Counter-Terrorism** are the measures put in place to ensure assets used or provided do not provide direct or indirect support or resources to organisations and/or individuals associated with terrorism

- **Money laundering** is the processing of the proceeds of crime to disguise their origins, making the funds appear to have been legitimately obtained
- **Terrorist act** is an act, or a threat to act, that:
 - intends to coerce or influence the public or any government by intimidation to advance a political, religious or ideological cause.
 - causes one or more of the following:
 - death, serious harm or danger to a person serious damage to property
 - a serious risk to the health or safety of the public
 - serious interference with, disruption to, or destruction of critical infrastructure such as a telecommunications or electricity network.
- **Terrorism financing** is using public or private funding to support a terrorist act, it includes;
 - legitimate means, such as charities and donations,
 - illegitimate means, such as fraud, money-laundering, kidnapping for ransom and extortion
 - It also means using any assets or in-kind support that can ultimately facilitate a terrorist act according to Australian laws. For example, using an organisation's internet services to facilitate propaganda activities.

ACTIONS

LiteHaus International will use reasonable endeavours to:

- Not partner with, sub-contract to or employ entities or individuals appearing on the following lists:
 - The Australian Government's Consolidated List which includes all persons and entities designated by the UN and Minister for Foreign Affairs for their association with the commission of terrorism acts pursuant;
 - The List of Terrorist Organisations which includes all organisations listed by the Australian Government as terrorist organisations under the Criminal code because they advocate the undertaking of a terrorist act;
 - The World Bank's Listing of Ineligible firms and Individuals, and:
 - The Asian Development Bank's Sanctions List.
- Ensure all program activities and individuals/organisations involved in delivering these program activities adhere and comply with the relevant laws, regulations and policies of Australia and the countries in which LiteHaus International operates;
- Adopt a pro-active risk management approach to the assessment, prevention, and detection of suspected terrorism financing activity and in determining the

type and frequency of counterterrorism financing measures to be applied with regular review and re-assessment.

- Ensure appropriate counter-terrorism due diligence is undertaken in the recruitment and selection of all personnel (board members, employees, interns, volunteers, contractors and consultants);
- Include terrorism financing and money laundering risk in its due diligence assessment of potential new partner organisations, suppliers and its projects;
- Ensure due diligence assessments of partner organisations consider the credentials, financial controls and procedures and ability of the organisation to mitigate the risk of terrorism financing and money laundering;
- Continuously assess terrorism financing risk through close collaboration and dialogue with communities and beneficiaries to ensure that assistance provided will not be misdirected for the purpose of terrorism financing;
- Ensure staff are adequately trained on counter terrorism and such training is provided annually or more frequently if deemed necessary;
- Undertake the necessary due diligence processes (including screening checks) prior to entering into any new corporate partnerships or accepting new funding opportunities from significant major donors;
- Ensure all partner organisations work with LiteHaus International to comply with relevant counter-terrorism laws and policies and is committed to support partner organisations in the development of their own capacity and processes on counter terrorism; and
- Require that all staff and partner organisations who participate in the work of LiteHaus International use all reasonable efforts to actively prevent, detect and immediately report any actual or suspected terrorism financing activity as outlined in the Counter-Terrorism Financing and Anti-Money Laundering Procedure.

RELATED DOCUMENTS

- LiteHaus International – Standard Operating Manual
- LiteHaus International – Code of Conduct