

COUNTER-TERRORISM & ANTI MONEY LAUNDERING POLICY

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Approved by	Founder	Date for review	June 30, 2024

1.0 Overview

Objective

This policy intends to build awareness, set standards and provide guidance on how to control and minimise any acts that contribute both knowingly or unknowingly to the support of terrorism and/or organizational crime.

While operating as a sole trader, Wanbel Consulting acknowledges the threat and societal implications of the proceeds of crime, and is committed to minimising the risk of supporting individuals and/or organisations associated with terrorist activities.

Scope

This policy applies to all employees, volunteers, consultants/sub-contractors and outsourced service providers performing work for Wanbel Consulting.

Definitions

- **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 proceeds of crime to disguise their origins, making the funds appear to have been legitimately obtained
- **Terrorist act** is an act, or threat to act, that:
 - intends to coerce or influence the public or any government by intimidation to advance a political, religious, or ideological cause
 - may cause death, serious injury to persons or property, and risk to the health and safety of the public
- **Terrorism financing** is using public or private funding to support a terrorist act, and includes:
 - legitimate mean, such as charities and donations
 - illegitimate means, such as fraud, money-laundering, kidnapping for ransom and extortion
 - instances such as using an organisation's internet services to facilitate propaganda activities
- **Fraud** refers to dishonestly obtaining a benefit, or causing a loss, by deception or other means. In broad terms, corruption is deliberate, serious wrongdoing that involves dishonest or partial conduct, a breach of public trust or the misuse of information or material.

2.0 Policy in detail

Approach

Wanbel Consulting will adopt a risk-based framework within its scope operating as a sole trader, that aligns with the expectation of Australian Government legislation; and the laws of any country consulting services are rendered for. In particular, it is also the policy of Wanbel Consulting to:

- Not partner with, sub-contract to, or employee entities on the following lists:
 - Persons and/or entities as advised by the UN and Australian Minister for Foreign Affairs for their association with the commission of terrorism acts

- 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 as part of its framework and where practical, identify and put in place internal controls that prevent, detect and respond to counter-terrorism/money laundering/fraud
- Complete a risk assessment at least every two years or earlier if deemed necessary
- Ensure all parties performing work on behalf of Wanbel Consulting, are aware of this policy and appropriate counter-terrorism due diligence is undertaken in the recruitment and/or selection of all personnel (volunteers, sub-contractors and consultants)
- Wherever practical, align to better practice advice issued by organisations such as the Australian Government's Attorney-General Department.

Key roles and responsibilities

- The Founder and Principal Consultant of Wanbel Consulting is responsible for ensuring a risk-based framework is in place, and modelling the highest standards of ethical behaviour and ensuring compliance with relevant legal obligations
- They are also the owner of this policy and are responsible for coordinating and documenting Wanbel Consulting's overall Counter-Terrorism and Anti-Money Laundering approach.

3.0 Further information

Relevant contact

Further information about this policy and risk framework can be obtained by contacting the policy owner at mkepui@wanbelconsulting.com