

Animal Welfare.
Worldwide.



FOUR PAWS Australia Counter-Terrorism Policy

September 2019

1 TARGET GROUP

This Counter-Terrorism Policy specifically imposes obligations on:

- a) all FOUR PAWS Australia personnel (being our board members, employees), volunteers, contractors and consultants;
- b) all partner organisations involved in implementing our projects or programs.

2 OBJECTIVE

This policy sets out our commitment to comply with laws and any contractual obligations applicable to us relating to counter-terrorism and provides a guide on what to do if non-compliance occurs or is suspected.

This policy applies to all our programs and activities with respect to all funds and in-kind support provided for our programs and projects in Australia and overseas.

This policy complies with the External Conduct Standards (ECS) requirements of the Australian Charities and Not-for-profits Commission (ACNC). Related to this policy is the Transfer of Funds Policy.

3 POLICY STATEMENT

- a) In compliance with applicable laws, we will exercise reasonable efforts to prevent our assets from becoming support, directly or indirectly, for any of the following entities and their activities:
 - i) a terrorist (being a person, group or organisation who is listed in a list of proscribed entities of the Australian government, a list published by the World Bank or the relevant country in which our program or project is located¹; and
 - ii) organisations and individuals for whom Australia has imposed sanctions under the *Charter of the United Nations Act 1945* (Cth) and regulations made under that Act; the *Autonomous Sanctions Act 2011* (Cth) and regulations made under that Act or the World Bank List.
- b) We will also exercise efforts to ensure that we meet the requirements under any contracts we have entered into relating to counter-terrorism measures.
- c) This policy will be embedded within our organisational culture and practices

¹ The lists are;

Published by the Australian government: the Consolidated List of the Department of Foreign Affairs and Trade (<https://www.dfat.gov.au/international-relations/security/sanctions/consolidated-list>) and the Attorney-General's list (<http://www.nationalsecurity.gov.au/Listedterroristorganisations/Pages/default.aspx>)

World Bank list:

<http://web.worldbank.org/external/default/main?theSitePK=84266&contentMDK=64069844&menuPK=116730&pagePK=64148989&piPK=64148984>

- d) We will create awareness in relation to counter-terrorism by distributing and explaining this policy to relevant personnel.
- e) We will advise partners (s. 2(b)) of counter-terrorism risks and will advise on the appropriate action to be taken if terrorism is identified.

4 POLICY IN PRACTICE

- a) No partnering will be entered into with any terrorist or any party who in our view may be affiliated with a terrorist.

We will do the following as pre-appraisal of each prospective partner in the FP Cooperation Agreement Process:

- i) Seek confirmation from them that they are aware of and can commit to complying with relevant laws and this Policy;
- ii) Confirm their identity, credentials, and good standing; and
- iii) Check their name and the names of their key personnel (being those who are involved in their governance (for example, members of their board), and management (for example, their executives), financial management and control at the organisational level (for example, their chief financial officer, financial controller or finance manager) and at the project level (for example, project finance manager) against the relevant Australian Government lists, the World Bank List and any lists published by the relevant country in which our program or project is located, through screening software (such as the Department of Foreign Affairs and Trade's Link Match Lite) and other methods of due diligence (such as reference checks).

We will re-appraise all partners (in the manner set out in (ii) and (iii) above) on an annual basis where our partnership has a term of over a year.

Written records of all appraisals undertaken will be retained and stored in both the partner country office and in Australia.

- b) We will ensure that our approved partners are aware of counter-terrorism measures and take steps to mitigate against any of our resources becoming support for terrorists and their activities:
 - i) We will discuss the issue of counter-terrorism with them during the development of relevant memoranda of understanding or partner agreements and ensure that such documents contain relevant undertakings in relation to counter-terrorism measures, including undertakings that the partner will require similar undertakings from their partners and sub-contractors who may be involved in any activity relating to our programs and projects.
 - ii) We will monitor our partners' compliance with this policy and the undertakings in relevant memoranda of understanding or partner agreements from time to time. In particular, the Head of F&A will ensure that regular monitoring and

testing (through independent audits as appropriate) are undertaken to verify whether the controls set in this Policy are complied with.

- c) Any transfer of funds must be done in compliance with our Transfer of Funds policy.
- d) The Country Director may implement additional requirements, processes, and guidelines in furtherance of this policy
- e) In the event of any incident where there has been, or suspected to have been, non-compliance with this policy or our obligations under the law of any contract relating to counter-terrorism:
 - i) The Country Director must inform the Board of FOUR PAWS Australia immediately; and
 - ii) The Country Director must take appropriate actions to address the incident including:
 - a) Immediate cessation or suspension of funding being provided (for example, to the relevant program or project);
 - b) Investigation of the incident; and
 - c) Notification to relevant authorities and to the other parties under the terms of a relevant contract (if and as required); and
 - iii) The Country Director must then in turn advise the Board of FOUR PAWS Australia of steps being taken in relation to the incident.

5 MONITORING AND REVIEW OF POLICY

- a) The Board of FOUR PAWS Australia is responsible for reviewing this policy regularly.
- b) Where compliance issues are identified, the Board of FOUR PAWS Australia will receive and consider reports from the Country Director about the issues and work with the Country Director to ensure that the issues are addressed promptly.
- c) Any updates and revisions to this policy must be approved by the Board of FOUR PAWS Australia.



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