



**SISTERS OF THE GOOD SAMARITAN FOUNDATION LTD  
COUNTER TERRORISM POLICY**

<b>APPROVED BY THE BOARD ON</b>	<b>6 January 2025</b>
<b>TO BE REVIEWED ON</b>	<b>30 June 2028</b>
<b>LAST AMENDED ON</b>	<b>22 January 2025</b>

## **INTRODUCTION**

### PREAMBLE

Sisters of the Good Samaritan Foundation Ltd (**GSF**) condemns all forms of violence including terrorism which has caused harm to thousands of people around the world. As a non-for-profit, we recognise that terrorist organisations or individuals may seek ways to use finances to support terrorist activities, with or without people’s knowledge. In a charitable setting, this may include:

- Using charity funding.
- Using charity assets.
- Using the charity’s name and status.
- Cleaning money through charities.
- Committing financial abuse within a charity; and
- Setting up a charity for an illegal or improper purpose.

For this reason, GSF seek to have policies and clear risk management procedures in place to ensure that every reasonable effort is made to minimise the risk of any inadvertent association with terrorist individuals, organisations or acts.

## APPLICABLE LAWS & GUIDANCE

GSF upholds all national and international laws for the prevention of financial wrongdoing including terrorism financing and activities. The two Acts and legislative mechanisms in Australia that prohibit terrorism activities include the:

- Commonwealth Criminal Code Act 1996 (Criminal Code); and the
- Charter of United Nations Act (Cth) 1945 (UN Charter Act)

These Acts apply penalties to the intentional or reckless support (whether direct or indirect) of terrorist individuals, organisations or acts.

## PURPOSE

The purpose of this policy is to:

1. Outline the measures GSF has taken in relation to the prevention of terrorism association and financing.
2. communicate clear expectations to our stakeholders regarding their responsibilities in the prevention and reporting of financial wrongdoing.
3. provide guidance for investigating allegations of financial wrongdoing.

## COMMITMENTS

GSF will take reasonable effort to minimise the risk of any inadvertent association with individuals, organisations or acts which is outlined below. This includes, but is not limited to:



- Ensure all GSF staff and volunteers are aware and comply to both Australian and domestic law in relation to counter terrorism.
- Conduct checks on all GSF staff and volunteers and to ensure they are in no way linked, directly or indirectly, to organisations and individuals associated with terrorism.
- Assess all GSF activities (including those carried out by those administering the works of GSF and strategic partners) to ensure activities comply with the External Conduct Standards and counter terrorism laws, both in Australia and in the countries in which activities are implemented.
- Provide ongoing training for staff, those administering the works of GSF and Partners to raise awareness of risks associated with terrorism, fraud and corruption, mitigation strategies and policies and procedures.
- Immediately report any activities associated or suspected to be associated to terrorism activities. GSF will immediately cease any further transfer of funds to that partner and notify the Australian Government as required under Australian law.

## SCOPE

This policy applies to all GSF People, including:

- All GSF Staff including but not limited to employees, contractors and consultants.
- All GSF Volunteers including but not limited to office and event-based volunteers
- All people working and administering the works of GSF
- All GSF Associates
- All GSF Strategic Partners including any organisation receiving GSF funding in Australia or abroad to implement activities including but not limited to community development, disaster response or non- development initiatives.

## DEFINITIONS & CATEGORIES

### *Definitions:*

**Counterterrorism:** The practice, techniques, and strategy used to combat or prevent terrorism.

**Terrorism Financing:** intentionally providing or collecting funds and being reckless as to whether those funds would be used to facilitate or engage in a terrorist act.

**Financial Wrongdoing:** Financial wrongdoing includes behaviour that is illegal or immoral with regards to financial transactions, including: bribery, corruption, fraud, money laundering, terrorism financing and violations of sanctions imposed by the Australian Government. For further information about this please see the GSF Financial Wrongdoing Policy.

### *Categories:*

**High risk partners:** For the purpose of this policy, high risk partners are GSF strategic partners located in areas where there are large amounts of current terrorist activities after reviewing terrorist listings. GSF staff will inform partners if they meet this criterion and therefore need to complete additional activities as listed in section 2 below

## RELATED POLICIES

Based on the nature of this policy, it could be directly or indirectly related to other GSF policies such as:

- GSF Financial Wrongdoing Policy
- GSF Finance Policy
- GSF Governance Policy
- GSF Whistleblower policy

## **GSF RELIEF INTERNAL COMMITMENTS - GSF PROCESSES & COMMITMENTS**

### Appraisal and Approval

During appraisal and approval processes GSF will:

- Conduct checks to ensure prospective partners are not including on the following lists:
  - 'National Security Listing of Terrorist Organisations' (<https://www.nationalsecurity.gov.au/Listedterroristorganisations>)
  - 'DFAT Consolidated List' (<https://www.dfat.gov.au/international-relations/security/sanctions/Pages/consolidated-list>)
  - 'OFAC Sanctions List Search' (<https://sanctionssearch.ofac.treas.gov/>)
  - 'World Bank's List of Ineligible Firms and Individuals'

<https://www.worldbank.org/en/projects-operations/procurement/debarred-firms>

- Conduct an 'Organisational Assessment' which will include assessing an organisations financial processes and governance to ensure alignment with this policy and the GSF Financial Wrongdoing Policy.
- For organisations deemed to be high risk additional processes will also be implemented including:
  - Requiring counter terrorism to be included in risk management assessments within their program framework
  - Requiring partner names of the strategic partner or implementing agencies, especially third parties which will benefit from GSF funds, to be provided to GSF which will be checked against the above lists.
  - Include counter terrorism concerns and mitigation strategies as discussion points in project review committee meetings, including determining if the partner should be listed on the high- risk registry presented to GSF's Governance Committee.
- Once approved, an MOU agreement will then inform strategic partners of their obligation to comply with the laws mentioned in this policy. This will include applying GSF policy requirements to those to whom they distribute assets and to immediately notify GSF of any suspected terrorism related links.

All MOU's provide links to lists and, where appropriate, these will be sent separately to the partner.

### Monitoring

- GSF staff will review the terrorist list every 6 months as part of the progress report review period.



- We will continue to assess financial systems, reports and accountability process through requesting 6-monthly financial reports and audits.
  
- Monitoring visits of the works will be conducted every 3 years, which include conducting a financial audit and assessing specific information relating to counter terrorism.
  
- For high-risk areas:
  - We will review their risk management procedures as part of their annual progress report.
  
  - Every 12 months we will send them terrorist list for them to check their own partners and implementing agencies.
  
  - Provide necessary updates to the board via the high-risk register.
  
- Any concerns or additional risks identified by GSF staff must be report to the Executive Director.

## **GSF EXPECTATIONS**

During project design and delivery, all are expected to:

- Read and adhere to GSF's Counter Terrorism Policy and MOU requirements.
  
- Understand and abide by local counter terrorism laws.
  
- Ensure any risks associated to terrorism is reported to GSF and included in their risk management frameworks and annual progress reports.
  
- If assessed as being in high-risk location, then abide by GSF's requested for additional actions as listed above including ensuring any third parties are not included on terrorist listings.



By signing the MOU, all agree that they will implement these commitments during the delivery of their program.

## **GSF MISSIONS INTERNAL COMMITMENTS (FOR THOSE ADMINISTERING GSF WORKS)**

### GSF'S PROCESSES & COMMITMENTS

- During the onboarding of new works administrators and associates, GSF will assess if those administering the works are in high-risk areas. If so, additional risk management discussions will occur, and strategies developed. This may include:
  - o Due diligence assessment of third-party relationships; and
  - o Expanded scope of the onboarding risk matrix and controls review.
- All new GSF works administrators and associates will be required to read this policy as part of yearly policy induction course.

### ASSOCIATES AND MISSIONS PARTNERS

- Read and adhere to GSF's Counter Terrorism Policy.
- Understand and abide by local counter terrorism laws.
- Ensure any risks associated to terrorism is reported to GSF.
- Those administering the works and associates in high-risk locations will also be expected to:
  - o More closely monitor and disclose their third-party partners; and
  - o Take a more active approach to risk management and controls.



## REPORTING OF POSSIBLE LINKS OR BREACHES

Any concerns, breaches of this policy or suspected links to terrorist activities, organisations or individuals must be reported immediately to the Executive Director of GSF.

If required or mandated, reports of possible links or breaches will then be made by GSF's Executive Director to the below government authorities. This includes reporting immediately any suspected links to organisations or individuals listed on the Australian government's terrorist listings.

- National Security Australia, [hotline@nationalecurity.gov.au](mailto:hotline@nationalecurity.gov.au), 1800 1234 00
- AFP Operations Coordination Centre, [A OCC-Liaison-Ops-Support@afp.gov.au](mailto:A OCC-Liaison-Ops-Support@afp.gov.au) (02) 6131 3000

In the case that GSF has programs funded by the Australian Government, GSF will also inform DFAT immediately.

Funding will be suspended until the position is clarified. If found, after due process, to have direct or indirect links with terrorist activities or organisations the partnership will be ceased.

The purpose of this policy is to provide guidance to GSF personnel, contractors and GSF funded partners in distinguishing between and clearly separating development and humanitarian, and non-development objectives and activities; in all aspects of the organisation's work, including programming, financial reporting, and fundraising and communications.

### Policy Review

This policy will be reviewed at least every three years, or as necessitated by legislative changes, incorporating lessons learned.