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Counter-Terrorism and Anti-Money Laundering Policy

Document History

Version	Date	Changed by	Description
0.10	01/11/2020	Shruti S	Updated as per ACFID requirements
			Next review before annual board meeting

If you require further information regarding this document please contact:

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Purpose

The purpose of this policy is to state Plus Education’s commitment to avoiding involvement in terrorist activities, money laundering and any other criminal misuse of funds and resources. This policy also articulates Plus Education’s commitment to complying with the relevant Australian and Partner country legislation for the prevention of terrorism and any related activities.

Plus Education regularly sends funds to developing countries to support our development activities and work with local organisations as implementing partners, some of which are subsidiaries. As such, we are aware of the need for a strong policy to ensure funds are appropriately channelled and used.

Scope

This policy applies to any irregularity, or suspected irregularity, involving employees and Board Members as well as, consultants, vendors, contractors, outside agencies doing business with employees of such agencies, and/or any other parties with a business relationship with Plus Education. This also applies to Plus Education’s partners. Any investigative activity required will be conducted without regard to the suspected wrong doer’s length of service, position/title, or relationship to the Company.



Definitions

Listed individuals or organisations – any individual or organisation which appears on Government terrorism lists

Money Laundering – the process of concealing the origin, ownership or destination of illegally or dishonestly obtained money and hiding it within legitimate economic activities to make them appear legal.

Terrorist organisation – an organisation that;

- A court finds is either directly or indirectly engaged in preparing, planning, assisting in or fostering the doing of a terrorist act, or
- A listed organisation that has been listed by the Government

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.

Policy

Plus Education is committed to using its best endeavours to ensure that all expenditure of funds and the implementation of program activities, including those carried out by any partners or affiliates in countries in which Plus Education operates comply with all laws and regulations relevant for the prevention and control of terrorism and money laundering.

The counter-terrorism policy has been guided the requirements of Australian Law and the United Nations charter. To comply with the requirements of Australian Law and the United Nations charter two websites must be monitored. These website are:

1. <http://www.nationalsecurity.gov.au/> (go to 'terrorist organisation' menu option)
2. http://www.dfat.gov.au/icat/UNSC_financial_sanctions.html (check the consolidated list)

This document has been written using information obtained from "Guidelines for Strengthening Counter-Terrorism Measures in the Australian Aid Program" produced by AusAID in September 2004.

Plus Education will work in conjunction with Australian and overseas governments to ensure its programs are not supporting terrorist activities. Plus Education will:

- In relation to counter-terrorism efforts: In all new project contracts and MOUs with partners there will be a common agreement by all the parties to share all responsibilities to mitigate the risk of association with terrorism and terrorist organisations.
- Comply with all counter-terrorism laws and policies: This will include Australian and all overseas partners
- Advise employees and volunteers of their obligations: Employees and volunteers will be advised to use their best efforts to ensure funds are not used to fund terrorist activities



- Make this policy available to all staff: All staff, volunteers, Board members and associates who are involved in all Plus Education activities will have access to this policy through the Plus Education website.

Responsibilities

The actions that must be undertaken by Plus Education are:

- Checking the two lists on the DFAT and National Security websites and ensuring updates to the website are taken into account. The lists should be checked for updates at least once a year and this action recorded.
- Before providing direct funding, support, resources or entering into an agreement with an organisation ensure that the organisation is not included on either list.
- Ensuring that organisations to whom funding, support or resources are being provided and who are themselves further distributing assets, know of, understand and comply with the legal and contractual requirements of counter-terrorism measures in Australia.

If a funded organisation appears on the list Plus Education will:

- Immediately cease funding or receiving funds from said organisation or individual
- Request the assistance of the Australian Federal Police to determine whether or not the organisation or individual is in fact a proscribed person or entity
- If appropriate, advise the other partners and funding bodies associated with the activity of the identified match.

It is the ultimate responsibility of the CEO at Plus Education to ensure that the above steps are followed. However all staff, Board members and partners are obligated to uphold this policy.

Where compliance issues are identified, the CEO will work with staff and other relevant stakeholders to address these issues promptly.

Reporting and compliance

If any staff member, Board member or partner becomes aware of any connection or allegation of a connection to terrorism of any person or program, whether directly or indirectly by Plus Education, they must promptly notify Plus Education in accordance with the Complaints policy or Whistleblower policy.

All financial transactions will be transparent to allow ease of monitoring. Furthermore, each Plus Education entity must undergo an annual audit.

The Board of directors will be briefed on counter-terrorism and anti-money laundering events annually and when relevant situations occur.



Related Documents

- Anti-Corruption/Bribery Policy
- Whistleblower Policy
- Complaints Policy