



ANTI-TERRORISM AND SANCTIONS POLICY

Purpose

The purpose of the Oceania Australia Foundation Limited's (OAF) Anti-Terrorism and Sanctions Policy is to promote awareness and the prevention of the support of terrorism. Specifically, this Policy seeks to prevent, detect and deter facilitation and unknowingly supporting Terrorist groups/organisations or individuals associated with terrorism and/or Organised Crime.

OAF complies with the provisions of federal law including the *Anti-Terrorism Act 2005* (Cth), *Criminal Code Act 1995* (Cth), United Nations Security Council (UNSC) sanctions regimes implemented under the *Charter of the United Nations Act 1945* (Cth) and Australian autonomous sanctions regimes implemented under *Autonomous Sanctions Act 2011* (Cth) and *Autonomous Sanctions Regulations 2011* (Cth).

Definitions

Terrorism

The act, or threat of action, where the action causes certain defined forms of harm or interference and the action is done or the threat is made with the intention of advancing a political, religious or ideological cause.

An 'individual or group associated with terrorism' includes:

- Those listed on the National Security Australia website:

www.nationalsecurity.gov.au/listedterroristorganisations

- Those named on the Consolidated List available from DFAT:

www.dfat.gov.au/international-relations/security/sanctions/pages/consolidated-list.aspx

- Those listed under United Nations Security Council (UNSC) sanctions regimes or Australian autonomous sanctions regimes:

<http://dfat.gov.au/international-relations/security/sanctions/sanctions-regimes/Pages/sanctions-regimes.aspx>

- Those listed by authorities as "terrorists or suspected terrorists"

Organised Crime

A conspiratorial enterprise engaged in illegal activities as a means of generating income.

Scope

This Policy and Procedures apply to all of OAF's staff, committee, team, volunteers and OAF's partners and contractors.

Guiding principles

1. OAF has a zero-tolerance policy towards any association with Terrorism and Organised Crime. To that end, OAF will ensure:

- funds are not provided directly or indirectly to individuals or organisations associated with Terrorism and/or Organised Crime;
- all individuals or organisations involved in implementing/facilitating projects on behalf of OAF are in no way in association directly or indirectly to organisations or individuals associated with Terrorism and/or Organised Crime;
- all activities, individuals /organisations involved and the general practice and functionality of OAF adheres and complies with the relevant laws, regulations and policies of Australia and the countries in which OAF operates;
- any breach of this policy will be immediately brought to the attention of the relevant Australian authorities and the appropriate authorities in any other jurisdiction in which OAF operates and, if appropriate, the national security hotline and the Australian Federal Police.

2. OAF and its partners will comply with counter-terrorism laws and policies through ongoing monitoring of activities of all partners and beneficiaries. OAF will use its best endeavours to ensure there is no link whatsoever with any entity or individual associated with terrorism. OAF partners are required to:

- Know the persons/organisations that are being directly assisted by them;
- Make sure that people/organisations being directly assisted are not on either of the lists published by the anti terrorism and security services in all counties in which OAF operates before assistance is provided and ensure that appropriate updates to the websites are taken into account;
- Make sure that directly funded persons/organisations are aware of and obliged to comply with these laws, and that they in turn are obliged to make sure that their distribution of the funds or support is made on the same basis;
- Apply particular caution where proscribed organisations or individuals are known to be in the area; and/or the scale of financial or material support transaction is such that it could potential provide significant support to a proscribed individual or organisation;
- Advise OAF immediately if it becomes aware of any breach by these organisations.

Procedures

OAF has and will continue to review the appropriate training, processes and systems it has put in place to prevent the facilitation of Terrorism financing.

The following Procedures in place must be complied with at all times:

1. PROJECTS

a) In identifying and committing to a Project within Australia or internationally all necessary due diligence processes must be completed. This process includes a mandatory check of DFAT's list of proscribed organisations to identify any potential NGO partners that may be listed.

2. THE PARTNERSHIP AGREEMENTS

a) When OAF enters into a Memorandum of Understanding ("MOU") with project partners, the MOU must outline the obligations and objectives of OAF and be in accordance with relevant laws, policies and regulations of Australia and the country in which the project will be implemented, relating to Anti-Terrorism procedures. As part of implementation and monitoring of

the project, the amount of funds, the purpose of the funds and receipts of payments must be stipulated so as to outline the basis for the payments made to OAF partners.

3. STAFF AND VOLUNTEERS

- a) All persons to whom this Policy will be appropriately educated and trained about Terrorism and related issues.
- b) All committee, team, Volunteers and Collaborative Organisations may be subjected to a Police check in Australia and/or country of operation if appropriate;
- c) Where considered appropriate, staff, committee, team and volunteers engaged in international and local volunteer programs will be subjected to appropriate screening processes prior to commencing;
- d) International Volunteers may also need to complete the necessary equivalent mandatory checks in the country of operation.