REBUILD AID FORENING

COUNTER-TERRORISM, SANCTIONS COMPLIANCE & PREVENTION OF TERRORIST FINANCING POLICY

VERSION 3.01

This Counter-Terrorism, Sanctions Compliance & Prevention of Terrorist Financing Policy sets out the framework, responsibilities, controls, and procedures to prevent the misuse or diversion of Rebuild Aid Forening's resources and ensure compliance with applicable laws, regulations, donor requirements, and best practices.

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Table of Content

1. Purpose 5

2. Scope and Applicability 6

3. Definitions 7

3.1 Terrorism 7

3.2 Terrorist Financing 7

3.3 Sanctions 8

3.4 Designated Persons and Entities 8

3.5 Due Diligence 9

3.6 High-Risk Contexts 9

4. Guiding Principles 10

4.1 Humanitarian Principles 10

4.2 Zero Tolerance for Terrorist Support 10

4.3 Legal and Regulatory Compliance 11

4.4 Risk-Based Approach 11

4.5 Accountability and Transparency 11

5. Roles and Responsibilities 12

5.1 Board of Directors 12

5.2 Executive Director 12

5.3 Finance Officer 13

5.4 Programme Managers 13

5.5 Staff and Volunteers 14

5.6 Implementing Partners 14

6. Counter-Terrorism and Sanctions Compliance 15

6.1 Prohibition of Support to Terrorist Organisations 15

6.2 Compliance with Sanctions Regimes 15

6.3 Prohibited Transactions 16

6.4 Restricted Activities 16

6.5 Humanitarian Exemptions 17

7. Due Diligence and Screening 18

7.1 Partner Due Diligence 18

7.2 Vendor and Supplier Screening 18

7.3 Staff and Volunteer Screening 19
7.4 Beneficiary Screening (Where Required) 19
7.5 Documentation of Screening Results 20
8. Financial Controls and Prevention of Terrorist Financing 20
8.1 Banking Controls 21
8.2 Cash Management Controls 21
8.3 Transfer Controls 21
8.4 Record Keeping 22
8.5 Monitoring of Financial Transactions 23
9. Operations in High-Risk and Conflict-Affected Contexts 23
9.1 Afghanistan and Other High-Risk Contexts 24
9.2 Access Constraints and Humanitarian Considerations 24
9.3 Risk Mitigation Measures 25
9.4 Third-Party and Partner Oversight 25
10. Monitoring, Compliance and Reporting 26
10.1 Compliance Monitoring 26
10.2 Internal Reporting Obligations 27
10.3 Reporting of Suspicious Activities 27
10.4 Donor Reporting Requirements 28
11. Incident Management and Investigations 29
11.1 Suspected Violations 29
11.2 Internal Investigations 30
11.3 Corrective Actions 30
11.4 Cooperation with Authorities 31
12. Training and Awareness 31
12.1 Staff Training 32
12.2 Partner Capacity Building 32
12.3 Refresher Training 33
13. Non-Compliance and Sanctions 33
13.1 Types of Non-Compliance 34
13.2 Organisational Response 34
13.3 Personnel Sanctions 35
13.4 Partner Sanctions 35

13.5 Serious Violations 36
13.6 Commitment to Compliance 36
14. Review, Updates and Version Control 36
14.1 Policy Review 37
14.2 Policy Updates and Amendments 37
14.3 Version Control 37
14.4 Version Control Log 38
14.5 Document Retention and Archiving 38
14.6 Distribution and Awareness 39
14.7 Continuous Improvement 39
15. Policy Effective Date and Review Schedule 39

1. Purpose

The purpose of this Counter-Terrorism, Sanctions Compliance & Prevention of Terrorist Financing Policy is to ensure that Rebuild Aid Forening conducts all activities in a lawful, ethical, transparent, and accountable manner while preventing the direct or indirect support of terrorism, terrorist organisations, sanctioned individuals or entities, and the financing of terrorist activities.

This Policy establishes the principles, responsibilities, controls, and procedures necessary to identify, assess, mitigate, monitor, and manage risks related to terrorism, sanctions violations, and terrorist financing across all organisational activities, programmes, partnerships, procurement processes, financial transactions, and grant-funded interventions.

As a Danish humanitarian and development organisation operating in both stable and high-risk environments, including conflict-affected and fragile contexts, Rebuild Aid Forening recognises its responsibility to comply with applicable Danish, European Union (EU), United Nations (UN), donor, banking, and regulatory requirements related to counter-terrorism, sanctions compliance, anti-money laundering (AML), and counter-terrorist financing (CTF).

This Policy aims to:

- Protect beneficiaries, communities, staff, volunteers, partners, donors, and stakeholders from risks associated with terrorism and terrorist financing;
- Safeguard organisational assets, funds, resources, and reputation;
- Ensure compliance with applicable laws, sanctions regimes, donor requirements, and contractual obligations;
- Strengthen due diligence, financial oversight, and risk management systems;
- Support responsible humanitarian and development programming in complex operating environments;
- Prevent the diversion, misuse, or abuse of funds, goods, services, or assistance;
- Promote accountability, transparency, and responsible stewardship of donor resources.

Rebuild Aid Forening maintains a zero-tolerance approach toward the provision of support, resources, services, or financing to terrorist organisations, sanctioned entities, or individuals involved in terrorism-related activities. At the same time, Rebuild Aid Forening remains committed to the humanitarian principles of humanity, neutrality, impartiality, and independence and will implement this Policy in a manner that enables principled humanitarian assistance to reach vulnerable populations in accordance with applicable legal frameworks and humanitarian exemptions.

2. Scope and Applicability

This Policy applies to all activities, programmes, projects, partnerships, financial transactions, procurements, grants, donations, and operational processes conducted, funded, managed, or implemented by Rebuild Aid Forening, regardless of funding source, geographic location, or implementation modality.

The Policy is mandatory for:

- All Board members, staff, volunteers, consultants, interns, contractors, and representatives acting on behalf of Rebuild Aid Forening;
- All implementing partners, sub-grantees, local partner organisations, and consortium members receiving funding, technical support, or delegated responsibilities from Rebuild Aid Forening;
- All humanitarian, development, recovery, advocacy, capacity-building, and community-based interventions;
- All donor-funded projects, including those financed by CISU, DERF, Globuspuljen, foundations, embassies, UN agencies, municipalities, private donors, and other institutional donors;
- All procurement activities, supplier engagements, service contracts, and grant agreements;
- All financial transactions, cash transfers, banking activities, asset transfers, and resource allocations carried out on behalf of Rebuild Aid Forening.

This Policy applies throughout the entire project and grant management cycle, including:

- Project identification and design;
- Partner selection and due diligence;
- Procurement and contracting;
- Recruitment and engagement of personnel;
- Programme implementation;
- Financial management and reporting;
- Monitoring, evaluation, and compliance reviews;
- Project closure and record retention.

Particular attention shall be given to operations conducted in high-risk, conflict-affected, fragile, or sanctions-sensitive environments, including Afghanistan and other contexts where terrorist financing, sanctions compliance, diversion of aid, or financial crime risks may be elevated.

All individuals and organisations covered by this Policy are required to:

- Comply with applicable counter-terrorism, sanctions, anti-money laundering (AML), and counter-terrorist financing (CTF) requirements;
- Cooperate with due diligence, screening, monitoring, audit, and compliance processes;
- Report suspected violations, suspicious activities, sanctions concerns, or potential terrorist financing risks without undue delay;
- Support the implementation of appropriate risk mitigation and compliance measures.

Where donor requirements, banking requirements, grant agreements, national legislation, European Union regulations, United Nations sanctions regimes, or other applicable legal obligations impose stricter standards than those

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Rebuild Aid Forening does not support, facilitate, promote, or participate in terrorism or terrorism-related activities under any circumstances.

3.2 Terrorist Financing

Terrorist financing refers to the direct or indirect provision, collection, transfer, use, management, or facilitation of funds, assets, goods, services, resources, or economic support intended to support terrorist activities, terrorist organizations, designated individuals, or persons associated with terrorism.

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If you are a Rebuild Aid partner or grantor, you can access the full policy by contacting us.