



ANTI-MONEY LAUNDERING AND COUNTER TERRORISM POLICY

Policy Number: POL-07
Version: 1.0 - May 13, 2021
Next Review: April 30, 2022

INTRODUCTION

PURPOSE

The purpose of this policy is to ensure that donor funds and resources entrusted to Beyond Charity are managed and disbursed with integrity and transparency and that funds and resources are not used to support any terrorist activity or to support individual or organisations that support terrorism, money laundering and any other criminal misuse of funds and resources.

SCOPE

This policy applies to all our Australian and international operations.

POLICY STATEMENT

Beyond Charity is committed to handling donor funds with integrity and transparency. We condemn all forms of terrorism and shall use our best endeavours to ensure that our funds and resources are not used to directly or indirectly support terrorist activity or individual or organisations that support terrorism, money laundering and any other criminal misuse of funds and resources.

Beyond Charity will not:

- partner or align ourselves with or sub-contract to any terrorist organisation;
- support projects or programs with community partners that involve terrorist organisations, or;
- be involved nor support nor have any dealings with any terrorist organisation, criminal organisations, criminals or any persons known to have links with such organisations.

PROCEDURES

To minimise risk, Beyond Charity will, prior to signing any agreement, send funds, or perform any activities with a funding partner or community partner, check our partner against the following sources. We will check both the organisation we are partnering with as well as board members and other senior management who are in decision-making roles of influence:

- Department of Foreign Affairs and Trade 'Consolidated List' of persons and entities subject to a targeted financial sanction imposed by resolution of the United Nations Security Council
- The Attorney-General's Department 'List of Terrorist Organisations', listed as terrorist organisations under Division 102 of the Criminal Code 1995.

Regarding our partnerships as identified from time to time by the Directors or Chair of the Board, Beyond Charity will run the above checks against the DFAT list and the Attorney-General's list before each financial disbursement to confirm that the following are not proscribed persons: name of community partner, name of board members and executive of community partner, name of any other individuals handling funds as part of the transfer to the nominated country.

If there is a match to either list, Beyond Charity will immediately cease funding or receiving funds from said organisation or individual and 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.