

# IMPACT

Shaping practices  
Influencing policies  
Impacting lives



## ANTI-TERRORISM AND ANTI-MONEY LAUNDERING POLICY

Version 2 | 2021

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# I. INTRODUCTION

IMPACT Initiatives (hereafter referred to as 'IMPACT') is a Swiss based Association and a sister organisation of ACTED. Independent, private and non-profit, IMPACT respects a strict political and religious impartiality, and operates following principles of neutrality, non-discrimination, transparency, according to its core values: responsibility, impact, enterprising-spirit and inspiration.

IMPACT is committed to shape practices and influence policies in humanitarian and development settings in order to positively impact lives of people and their communities. IMPACT aims to enable better and more effective decision making by generating and promoting knowledge, tools and practices for humanitarian and development stakeholders.

The commitment of IMPACT is guided by the following four core values:

- Responsibility: we contribute to the efficient and responsible delivery of aid with the means and the resources that have been entrusted to us.
- Impact: we are committed to promoting better aid practices and policies to support the communities and the people with whom we engage.
- Enterprising-spirit: we are enterprising and engage in our work with a spirit that creates value and overcomes challenges.
- Inspiration: we strive to inspire all those around us through our vision, values, approaches, choices, practice, actions and advocacy.

## A. Policy statement

IMPACT denounces all forms of terrorism and will never knowingly support, tolerate or encourage terrorism or the activities of those who use and/or finance terrorism. In accordance with United Nations Security Council's resolutions, in particular S/RES/1269 (1999), S/RES/1368 (2001) and S/RES/1373 (2001) and the international instruments relating to the fight against terrorism, IMPACT is firmly committed to the international fight against terrorism, and in particular against the financing of terrorism and any related activities, in particular the laundering of funds of illicit origin. It is IMPACT's policy to ensure that none of its funds and those of its donors are used, directly or indirectly, to support individuals or entities associated with terrorism or to launder funds derived from illegal activities.

**International and national regulations:** IMPACT recognises the rules with which donor countries comply. IMPACT recognises the legislation relating to anti-terrorism and the fight against money laundering.

IMPACT adopts a zero tolerance approach towards terrorism and money laundering and is committed to respect the highest standards in terms of efficiency, responsibility and transparency in its activities. To this end, IMPACT's Anti-Terrorism and Anti-Money Laundering Policy:

- Encourages prevention;
- Promotes detection;
- Sets out a clear investigation procedure;
- Sets out a mechanism of sanctions.

The policy is aimed at guiding IMPACT staff and the other entities referred to in Article 1 of this policy, and must be considered together with:

- IMPACT's Code of Conduct;
- IMPACT's Grievance Policy;



- IMPACT's Child Protection Policy;
- IMPACT's Conflict of Interest Prevention Policy;
- IMPACT's Anti-Fraud, Bribery & Corruption Policy;
- IMPACT's Policy Against Sexual Exploitation and Abuse;
- IMPACT's Data Protection Policy;
- IMPACT's Anti-Terrorism and Anti-money laundering Policy;
- IMPACT's Environmental Safeguarding Policy;
- IMPACT's procedures, manuals and handbooks;
- Code of Conduct for The International Red Cross and Red Crescent Movement and NGOs in Disaster Relief, of which IMPACT is a signatory;
- U.N. Inter-Agency Standing Committee (IASC) Six core principles relating to Sexual Exploitation and Abuse.

## B. IMPACT's principles in terms of fight against terrorism and money laundering

IMPACT is based on 3 main principles related to the fight against terrorism and money laundering:

- **Commitment against terrorism and money laundering:** IMPACT refuses to directly or indirectly support any terrorist or money laundering action and commits to minimise the risks of participation in terrorism or money laundering in the implementation of its activities.
- **Transparency and responsibility:** IMPACT is committed to being fully accountable and transparent to its beneficiaries, partners, suppliers and donors, by providing access to information on the use of its funds. IMPACT is committed to having all the necessary tools in hand to ensure the appropriate management of its operations.
- **Professionalism:** IMPACT bases the conceptualisation, implementation, management and evaluation of its programmes on high standards of professionalism, and capitalises on its experiences in order to maximise its efficiency and the use of its resources.

## II. INTERPRETATION AND APPLICATION

### Article 1 – Scope of application

1. This policy applies to all IMPACT staff and IMPACT governance members.
2. The provisions of this policy may also be applied to any person employed by an entity that carries out missions for IMPACT.
3. This policy applies in particular to consultants, suppliers, sub-grantees, implementing partners and associated entities.
4. This policy also applies to all partner organisations, to their Board members, staff, volunteers and interns, to their service providers, contractors and subcontractors who implement projects funded by or through IMPACT.



## Article 2 – Definitions

1. **Act of terrorism:** for the purpose of this policy, « act of terrorism » means any act constituting a grave breach, or its funding or laundering of the funds derived from such breach when it is intended to kill or seriously wound a civilian, or any other person that does not take a direct part in hostilities in a situation of armed conflict, when, by its nature or context, this act is intended to intimidate a population or to compel a government or an international organisation to do or refrain from doing any act.
  - i. **Funding of terrorist activities:** For the purposes of this policy, "funding of terrorist activities" means the provision or raising of funds, by any means, directly or indirectly, unlawfully and deliberately, with the intent that such funds be used or with knowledge that they will be used, in whole or in part, directly or indirectly, to commit a terrorist offence or to contribute to the commission of such offence.
  - ii. **Money laundering of funds derived from terrorist activities :** for the purposes of this policy, "money laundering of funds derived from terrorist activities" means facilitating, by any means, the false justification of the origin of the property or income of the perpetrator of a terrorist offence, having provided the perpetrator with a direct or indirect benefit, but also assisting in the placement, concealment or conversion of the direct or indirect yields of an offence with the knowledge that such transactions or their yields are intended to be used or have been used, in whole or in part, for terrorist purposes or will benefit terrorist groups.
2. **Money laundering:** for the purposes of this policy, "money laundering" means facilitating, by any means, the false justification of the origin of the property or income of an offender that has yielded a direct or indirect profit, but also assisting in the placement, concealment or conversion of the direct or indirect yields of an offence. Thus, donations or payments that are part of a loan or are subject to unusual conditions may be classified as money laundering.
3. **Participation in the activities of a terrorist group:** for the purposes of this policy, "participation in the activities of a terrorist group" means the provision of information or material resources, or any form of financing the activities of a terrorist group, with the knowledge that such participation will contribute to the criminal activities of the terrorist group.
4. **Terrorist group:** for the purposes of this policy, a "terrorist group" is defined as a structured group of more than two persons, established for a period of time and acting in concert to commit terrorist offences; "structured group" means a group that is not randomly formed for the immediate commission of an offence and that does not need to have formally defined roles for its members, continuity of its membership or a developed structure.

The terrorist groups targeted by this policy are those defined in the sanctions lists recognised by donors.
5. **Material support for terrorism:** for the purposes of this policy, "material support for terrorism" refers to the supply or movement of services, assets and property, including trade transactions such as the sale, acquisition or exchange of a cultural object of archaeological, artistic, historical or scientific interest illegally removed from an area controlled by a terrorist group at the time of the removal, through persons engaging in or acting as intermediaries if the support in question is performed with the knowledge that such operations or the proceeds thereof are intended to be used, in full or in part, for the purpose of terrorism or will benefit terrorist groups.



6. **Funds:** For the purposes of this policy, "funds" refer to assets of every kind, whether tangible or intangible, movable or immovable, however acquired, and legal documents or instruments in any form, including electronic or digital, evidencing title to, or interest in, such assets, including, but not limited to, bank credits, travellers' cheques, bank cheques, money orders, shares, securities, bonds, drafts, letters of credit.
7. **Beneficiaries:** Under the terms of this policy, the term "beneficiaries" refers to any person who benefits, directly or indirectly, from IMPACT's programmes.
8. **Consultant:** Under the term of this policy, a "consultant" is a third party, individual or group, with or without legal personality, who directly or indirectly provides any type of consulting services to IMPACT, whether for a fee or not.
9. **Associated entities:** for the purposes of this policy, "associated entities" are legal persons under private or public law who play an active role in the implementation of the project but are not responsible for managing any budget.
10. **Governance:** Under the terms of this policy, the term "governance" refers to any Member elected by decision making bodies to participate in IMPACT's managerial and administrative governance bodies. In particular, IMPACT's Committee Administrators are Governance members.
11. **Implementing partners:** for the purposes of this policy, an "implementing partner" is a partner to whom the implementation of one or more projects or activities has been delegated, and to whom a budget has been allocated for this purpose. In particular, this refers to international NGOs and/or national NGOs and/or public institutions. They may also be individuals.
12. **Stakeholders:** for the purposes of this policy, "stakeholders" are individuals or groups, with or without a legal personality, who directly or indirectly, voluntarily or involuntarily, contribute to, participate in or benefit, in any way, from the actions, programmes and activities of IMPACT.
13. **IMPACT staff:** for the purposes of this policy, the term "IMPACT staff" refers to any person employed by IMPACT. The volunteers and interns of IMPACT are considered to fall within this category, for the purposes of this policy.
14. **Sub-grantee:** for the purposes of this policy, a "sub-grantee" is an individual or a group, with or without legal personality, who receives a budget to carry out a project or activity.
15. **Supplier:** for the purposes of this policy, a "supplier" is a third party, individual or group, with or without legal personality, who, directly or indirectly, provides any type of goods and/or services to IMPACT, whether for a fee or not.

### Article 3 – Information and adherence to the policy

1. This policy is published under the authority of IMPACT. IMPACT staff, as well as the other entities referred to in Article 1 of this policy, are required to conduct themselves in accordance with this policy and must therefore be aware and have understood of its provisions and of any changes. When they are unsure of how to proceed, they should seek the advice of a competent person, notably their line manager.
2. IMPACT staff, as well as the other entities referred to in Article 1 of this policy, who negotiate the working conditions of IMPACT staff as well as any type of contracts concluded with and by external entities referred



to in Article 1 of this policy, must include a provision specifying that this policy must be respected and that it forms part of these conditions.

3. It is the responsibility of IMPACT staff with managerial responsibilities, as well as the other entities referred to in Article 1 of this policy, to ensure that staff under their supervision comply with this policy; and to take or propose appropriate disciplinary or judiciary measures as sanction against any violations of its provisions.
4. This policy shall form part of the working conditions of IMPACT staff and the conditions for the performance of the missions of the other entities referred to in Article 1 of this policy from the moment they certify that they have read it.
5. IMPACT will review the provisions of this policy at regular intervals.

#### **Article 4 – Purpose of the policy**

The purpose of this policy is to:

1. Implement mechanisms to combat terrorism and money laundering through prevention, reporting, action, investigation and sanction mechanisms applicable to IMPACT staff and other entities mentioned in Article 1 of this policy.
2. Specify the rules relating to the fight against terrorism and money laundering that IMPACT staff and other entities referred to in Article 1 of this policy must observe.
3. Inform third parties of the conduct they are entitled to expect from IMPACT staff and other entities referred to in Article 1 of this policy.



## III. GENERAL PRINCIPLES

### Article 5 – Neutrality

IMPACT staff, as well as the other entities referred to in Article 1 of this policy, must fulfil their duties in a neutral and apolitical manner, in accordance with the law, legitimate instructions and ethical rules relating to their roles.

### Article 6 – Impartiality

In the context of their professional roles and/or their missions, IMPACT staff, as well as the other entities referred to in Article 1 of this policy, must act in accordance with the law and exercise their discretionary power in an impartial manner, taking into consideration only relevant circumstances.

### Article 7 – Confidence of stakeholders

IMPACT staff, as well as the other entities referred to in Article 1 of this policy, have a duty to conduct themselves at all times in a way that reflects and upholds IMPACT's values of integrity, impartiality and efficiency and contributes to strengthen the confidence of all stakeholders regarding IMPACT's integrity, impartiality and efficiency.

### Article 8 – Hierarchical responsibility

IMPACT staff report to their immediate line manager and/or the head of their functional department, unless otherwise provided for by law.

### Article 9 – Confidentiality

Duly considering the stakeholders' potential right to access information, IMPACT staff, as well as the other entities referred to in Article 1 of this policy, must process all the information and all the documents acquired during or as part of the exercise of their duties adequately and with the necessary confidentiality.

### Article 10 – Political or public activity

1. Subject to respect of fundamental and constitutional rights, IMPACT staff must ensure that their personal participation in political activities or their involvement in public or political debates does not alter the confidence of stakeholders, international, national or local authorities, or IMPACT, with regard to their ability to complete their mission fairly and impartially.
2. In the performance of their duties, IMPACT staff must not use the resources for partisan purposes.

### Article 11 – Protection of privacy

All the necessary measures must be taken to ensure that the privacy of IMPACT staff and of the other entities referred to in Article 1 of this policy, is appropriately respected.

### Article 12 – Information held





1. Considering the general framework of international law regarding access to information held by private individuals, IMPACT staff and the other entities referred to in Article 1 of this policy should disclose information only in respect to the rules and requirements applicable to IMPACT.
2. IMPACT staff and the other entities referred to in Article 1 of this policy must take appropriate measures to guarantee the security and confidentiality of the information for which they are responsible or of which they are aware.
3. IMPACT staff and the other entities referred to in Article 1 of this policy must not seek access to information which would be inappropriate for them to have. IMPACT staff and the other entities referred to in Article 1 of this policy must not make inappropriate use of the information they may obtain in or as part of the exercise of their duties.
4. In the same way, IMPACT staff and the other entities referred to in Article 1 of this policy must not retain professional information that may or should be legitimately circulated, or circulate information they know, or have reasonable grounds to believe, is inaccurate or misleading.
5. For the purposes of this policy, this article must be read in conjunction with Article 19 of this policy.

### **Article 13 – Professional resources**

In the exercise of their discretionary power, IMPACT staff and the other entities referred to in Article 1 of this policy must ensure that the staff and the property, facilities, services and financial resources entrusted to them are managed and used in a useful, effective and economic manner. They must not be used for private purposes, unless authorised in writing.

### **Article 14 – Responsibility of line managers**

1. IMPACT staff in charge of supervising or managing other IMPACT staff must do so in accordance with the policies and objectives of IMPACT. They shall be liable for acts and omissions of their staff that are contrary to these policies and objectives if they have not taken the steps that normal diligence required of a person in their position to prevent such acts or omissions.
2. IMPACT staff tasked with supervising or managing other IMPACT staff must take all necessary and legally permissible measures to prevent its staff from engaging in acts that may characterise the participation or implementation of terrorist and laundering offences. These measures may include: drawing attention to the importance of enforcing laws and regulations, ensuring adequate training in the fight against terrorism and to set an example of integrity through their personal conduct.

## **IV. MECHANISMS TO FIGHT TERRORISM AND MONEY LAUNDERING**

### **Article 15 – Prohibition of any act of terrorism or money laundering**

IMPACT staff and other entities referred to in Article 1 of this policy shall not participate, directly or indirectly, in an act of terrorism or an act of money laundering within the meaning of this policy.



## **A. Mechanisms to prevent the participation in and implementation of terrorist acts and money laundering**

### **Article 16 – Importance of prevention**

Fully aware that participation in acts of terrorism and money laundering, as defined in this policy, can be most effectively avoided by creating an effective organisational culture focused on the prudent and controlled use of funds raised within the organisation's mandate, IMPACT has developed a series of preventative mechanisms and internal control systems, aimed at preventing and identifying acts involved in the implementation and financing of terrorism and money laundering, including those in IMPACT's procedures, manuals and handbooks.

IMPACT's procedures place a strong emphasis on deterrence, detection, prevention and intervention.

### **Article 17 – Prevention and identification mechanisms**

In order to minimise the risk of misuse of aid that may contribute to the financing of terrorism and/or money laundering, especially when they are the proceeds of acts of terrorism, IMPACT uses the following approach:

1. Conduct regular risk analyses of anti-terrorist and anti-money laundering activities.  
Risk analysis generally includes a review of relevant legal requirements of donor and host governments, as well as donor policies.  
It also includes security analyses, including stakeholder analyses (armed groups, state and non-state actors), to determine the risk that terrorism targets or weakens our operations.
2. Identify risk factors throughout the project or programme cycle and throughout the supply chain, recognise their probability, understand the consequences and implement appropriate countermeasures, through established internal control and reporting systems.
3. Apply a strict code of conduct among its staff and the staff of the other entities referred to in Article 1 of this policy, which includes a strong reference to the fight against embezzlement and money laundering and a declaration on financial transactions with armed groups.
4. Provide IMPACT staff and other entities referred to in Article 1 of this policy with a good understanding and clear direction and to encourage them to take ownership of IMPACT's values and policies.
5. Maintain complete financial records that account for all expenditures and publish annual financial statements with a detailed breakdown of revenues and expenses.
6. Conduct an annual external audit of all expenditures as well as external verifications of specific projects.
7. Reserve the right to check the references of third parties whom IMPACT has a contractual relationship with in order to ensure that these persons are not associated with terrorism and do not appear on the lists of fight against terrorism.
8. Train regularly its staff and implementing partners on policies, procedures and practices to combat embezzlement, money laundering and acts of terrorism. In addition, staff and partners must be able to identify any payments or donations that may be suspicious and be familiar with IMPACT's adequate internal reporting, validation and alert procedures.



9. Ensure that field teams maintain a respectful and appropriate dialogue with beneficiaries and other stakeholders. Building trust with beneficiaries and partners is a particularly effective way to facilitate information sharing and reduce the risk of misappropriation of funds and acts of terrorism.
10. Apply the principle of supplier knowledge to all calls for tenders.

## **B. Duty to report**

### **Article 18 – Reporting**

In case of suspicion of activity related to terrorism and/or money laundering as defined in this policy, IMPACT:

1. Encourages stakeholders to report suspected terrorist or money laundering activities by confidential means via [transparency.geneva@impact-initiatives.org](mailto:transparency.geneva@impact-initiatives.org);
2. Undertakes to investigate in accordance with IMPACT's policy on the fight against terrorism and money laundering and to take the necessary measures;
3. Undertakes to notify the donor if a link is uncovered between funds and an organisation linked to terrorism or money laundering according to mechanisms agreed with the latter.

## **C. Conduct in the event of terrorist offences or money laundering**

### **Article 19 – Action to be taken in the event of terrorist offences or money laundering**

1. Since IMPACT staff and the other entities referred to in Article 1 of this policy are generally the only ones who know if they are confronted with a terrorist or money laundering attempt or offence, they are personally liable for:
  - Being attentive to any actual or potential terrorist offences or money laundering;
  - Taking measures to avoid such an act;
  - In accordance with Article 18 of this policy, informing his or her line manager and/or personal contact within IMPACT and in any case [transparency.geneva@impact-initiatives.org](mailto:transparency.geneva@impact-initiatives.org) of any terrorist offences or money laundering as soon as he or she becomes aware of it;
  - Complying with any final decision requiring him/her to withdraw from the situation giving rise to such an act.
2. If IMPACT staff and other entities referred to in Article 1 of this policy are offered an act that may participate in or constitute a terrorist or money laundering offence as defined by this policy, they must take the following measures to ensure their protection:
  - Refuse to implement the act; it is not necessary to accept it in order to use it as evidence;
  - If possible, try to identify the person who made the offer;
  - Avoid prolonged contact, although knowledge of the reason for the offer may be useful in a statement;
  - Try to have witnesses, for example colleagues working in the vicinity;
  - Draw up as soon as possible a written report on this attempt and communicate it to his/her line manager or to his/her personal contact within IMPACT;



- In accordance with Article 18 of this policy, report the attempt as soon as possible to his/her line manager or to his/her personal contact within IMPACT and in any case through [transparency.geneva@impact-initiatives.org](mailto:transparency.geneva@impact-initiatives.org).
3. No IMPACT staff and other entities referred to in Article 1 of this policy shall suffer from their refusal to pay or receive litigious funds or from an ethical alert made in good faith.
  4. IMPACT considers the safety and security of its staff to be of paramount importance. In situations of serious coercion and in the event of serious and imminent danger to the physical integrity or safety of persons, IMPACT staff and other entities referred to in Article 1 of this policy must not endanger themselves or others by strictly complying with this policy. IMPACT strives to prevent its staff from being victims of such situations. However, if they do occur, these incidents must be reported.
  5. IMPACT undertakes to notify the donor if a link is discovered between funds and an organisation linked to terrorism or money laundering activity according to the mechanisms agreed with the latter.

## D. IMPACT's investigations mechanisms

### Article 20 – Investigation by IMPACT

1. In accordance with Article 18 of this policy, staff and other entities referred to in Article 1 of this policy must inform his or her line manager and/or Country Coordinator/Representative within IMPACT and in any case [transparency.geneva@impact-initiatives.org](mailto:transparency.geneva@impact-initiatives.org) of any suspicions of terrorist offences or money laundering as defined in this policy.
2. An e-mail reply is sent by [transparency.geneva@impact-initiatives.org](mailto:transparency.geneva@impact-initiatives.org) upon receipt of the alert, that:
  - Informs of the foreseeable time needed to examine its admissibility and how the reporter will be informed of the follow-up to his/her report;
  - Details the process to be followed in the event of suspicion of terrorist acts and/ or money laundering;
  - Requests, where appropriate, more information to clarify and assess the alert.
3. The management of the alert is carried out either at the local, national or IMPACT headquarters level according to the assessment of the alert. This evaluation is carried out by the Transparency & Compliance Focal point at IMPACT headquarters upon receipt of the alert on [transparency.geneva@impact-initiatives.org](mailto:transparency.geneva@impact-initiatives.org).
4. IMPACT staff and other entities referred to in Article 1 of this policy shall:
  - Cooperate with any investigation conducted by IMPACT;
  - Keep records of any alleged involvement in the case that it may be required for an investigation;
  - Maintain the confidentiality of all allegations.
5. IMPACT records the details of each proven case of terrorist offence and money laundering and the actions taken in a register of terrorist acts and money laundering.
6. The Executive Director reports any proven cases and the measures proposed to IMPACT's Committee.



## **Article 21 – Investigating authority**

The HQ Investigation team appointed by the Executive Director is responsible for investigating all issues linked to terrorism and money laundering within IMPACT.

## **Article 22 – Specific audits of situations relating to terrorism and money laundering**

1. Investigations on specific frauds and financial irregularities related to terrorism and money laundering are intended to verify the existence and extent of suspected fraud and financial irregularities. These investigations may be carried out at the request of the Executive Director or any other member of IMPACT senior management team.
2. These investigations can be conducted either at local, national or regional levels or by IMPACT headquarters, depending on the evaluation of the alert by the Transparency & Compliance Focal Point at IMPACT's headquarters.
3. The investigation team appointed by the Executive Director, shall exercise the utmost discretion when carrying out an investigation on fraud or financial irregularity.
4. All inquiries will be communicated in writing to the investigation team at IMPACT headquarters.

## **E. Sanction mechanism**

### **Article 23 – Measures following investigation**

If the investigation conducted internally by IMPACT demonstrates the existence of a proven offence related to terrorism or money laundering, the HQ Investigation team shall inform the Executive Director and propose appropriate measures to be implemented, such as the sanction of the staff concerned in accordance with IMPACT's internal general HR policy, the suspension or termination of the contract(s) concluded with any other entity referred to in Article 1 and the filing of a complaint with the competent police services.

## **V. IMPLEMENTATION OF THE POLICY**

### **Article 24 – Implementation of the policy**

The Transparency & Compliance Focal Point is responsible for the independent oversight of IMPACT's anti-terrorism and anti-money laundering policy and is responsible for its implementation and for promoting transparency within the organisation.

This anti-terrorism and anti-money laundering policy comes into effect after approval by the Committee of IMPACT on 1<sup>st</sup> May 2021.

### **Article 25 – Adherence to the policy**

IMPACT staff and the other entities referred to in Article 1 of this policy certify that they adhere to these principles by signing the IMPACT Policy Acceptance form and/or by signing their employment contract.





**ANTI-TERRORISM AND ANTI-MONEY  
LAUNDERING POLICY  
IMPACT 2021**

