

## **Anti-Terrorism, Sanctions Compliance & Risk Prevention Policy**

### **1. Purpose of the Policy**

Africa-Asia Impact (AAI) is fully committed to preventing terrorist financing, money laundering, and diversion of funds. This policy establishes the standards and procedures to ensure that AAI, its partners, suppliers, sub-contractors, and beneficiaries do not directly or indirectly support individuals or entities involved in terrorism or listed on international sanctions lists.

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### **2. Applicable International Sanctions Lists**

AAI screens all relevant individuals and organizations against the following internationally recognized lists:

1. **United Nations Security Council Consolidated List**  
*Issued by:* UN Security Council Sanctions Committees  
*Used by:* All UN agencies, governments, and donors.
2. **European Union Consolidated Financial Sanctions List**  
*Issued by:* Council of the European Union / EEAS  
*Applies to:* All EU member states and EU-funded projects.
3. **U.S. OFAC Specially Designated Nationals (SDN) List**  
*Issued by:* U.S. Department of the Treasury, OFAC  
*Used globally as a best-practice risk management tool.*
4. **World Bank Listing of Ineligible Firms and Individuals**  
*Used to prevent fraud, corruption, and ineligible contracting.*

AAI may consult additional national or regional lists when required by donors or host governments.

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### **3. Mandatory Screening Requirements**

AAI systematically screens the following categories before engagement, contracting or financial support:

- AAI board members and senior management
- All employees, consultants, interns, and volunteers
- All implementing partners and sub-grantees
- Partners' partners (second-tier partners)
- Suppliers and sub-contractors
- Community committees, local facilitators, and focal persons
- Beneficiaries receiving financial or material support (e.g. mini-grants)

Screening is repeated annually and whenever new information becomes available.

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#### **4. Zero Tolerance and Prohibited Activities**

AAI strictly prohibits:

- Direct or indirect support to individuals or entities engaged in terrorism
- Collaboration with organizations affiliated with, or providing material support to, terrorist groups
- Financial transactions involving sanctioned individuals or entities
- Procurement from suppliers or sub-contractors listed on sanctions lists
- Recruitment of individuals linked to extremist or radicalized groups

Any positive match results in immediate suspension and reporting to relevant authorities and donors.

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#### **5. Contextual Awareness & Radicalization Prevention**

AAI works in regions where extremist groups may attempt recruitment or influence. Staff and partners must remain aware of:

- Jamaat-ul-Mujahideen Bangladesh (JMB) and Ansar al-Islam in Bangladesh
- Al-Shabaab and IS-Mozambique Province influencing regions bordering Tanzania

AAI does not engage with, support, or contract individuals affiliated with extremist networks.

AAI encourages staff, partners, and community members to report concerns regarding:

- Signs of radicalization
  - Suspicious behavior
  - Inappropriate messaging or extremist propaganda
  - Unusual financial activity
  - Community intimidation or coercion
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## **6. Responsibilities**

AAI Management

- Ensures that screening procedures are implemented and documented.
- Provides training to staff and partners.
- Reviews and updates this policy.

Staff and Consultants

- Must follow all screening and reporting procedures.
- Must immediately report any suspected risks.

Partners, Sub-contractors, Suppliers

- Must sign and comply with this policy.
  - Must conduct screening of their own staff and sub-partners.
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## **7. Reporting & Escalation**

AAI maintains confidential reporting channels.

Any suspicion of links to terrorism or sanctions-list matches must be escalated immediately to:

1. AAI management
2. Relevant donor or contracting authority
3. Local authorities if legally required

Internal investigations are carried out in line with AAI's complaints and safeguarding policy.

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## **8. Record-Keeping**

AAI maintains secure, confidential records of:

- Screening results
- Dates and methods of screening
- Decisions taken in cases of potential risk
- Partner declarations of compliance

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## **9. Review Cycle**

This policy is reviewed every two years, or earlier if:

- International sanctions lists change
- Donor requirements change
- AAI expands to new countries
- Local security contexts shift

All partners must be notified immediately of updates.