

ANTI-TERRORISM AND ANTI-MONEY LAUNDERING POLICY

Last revised: *17th October 2022*

OBJECTIVES

The objectives of this policy is to implement processes and practices that:

- Minimise the risk of RainShine providing support to individuals and organisations that support terrorism; and
- Ensure our funds do not support organisations or individuals seeking to launder money for criminal activities or to use funds for terrorism.

SCOPE

This policy applies to all RainShine representatives and partners across all workplaces we operate in and all activities we undertake. Including, but not limited to, employees, consultants, interns, volunteers, contractors, partners, Board members and any other person associated or working under contract, or by agreement with RainShine USA/Australia in any capacity.

Compliance with this policy is mandatory.

RISK EXPOSURE

When operating overseas RainShine is exposed to a number of risks related to the misappropriation of charity funds that could be directed towards terrorism and money laundering. Example of these types of exposure, include, but not limited to:

- Funds or other resources being stolen or misappropriated;
- Payments or other benefits being given to individuals who do not qualify as beneficiaries;
- Funds inadvertently being used to finance terrorism or other criminal activities;
- Funds being used for purposes other than the charity's purposes;
- An illegitimate donor using the charity for money-laundering (including disposing of the proceeds of crime) and/or tax avoidance; and,
- A third party collaborating with the charity who is not using funds appropriately, not undertaking agreed actions, or not having procedures in place to prevent the types of risks listed above.

IMPLEMENTATION

RainShine will implement the following actions to reduce its risk exposure to individuals and organisations associated with terrorism and money laundering:

- a) Annually verify all partners, contractors, employees, and volunteers against the following lists:
 - The Australian Government's Consolidated List, which includes all persons and entities designated by the United Nations (UN) and Minister for Foreign Affairs for their association with the commission of terrorist acts;
 - The List of Terrorist Organisations which includes all organisations proscribed by the Australian Government as terrorist organisations under the Criminal Code because they advocate the undertaking of a terrorist act;
 - The World Bank's Listing of Ineligible Firms and Individuals;
 - The Asian Development Bank's Sanctions List; and,
 - Office of Foreign Assets Control (OFAC), United States of America.
- b) Immediately report where a RainShine partner, or employee/ volunteer of a RainShine partner or a sub-contractor of a RainShine partner has been found to have engaged in support to a terrorist organization. RainShine will immediately cease any further transfer of funds to that organisation and notify the Australian Government as required under Australian law.
- c) Report any actual or suspected terrorism financing. In such instances, the National Security Hotline will be immediately contacted. RainShine will also notify the Australian Charities and Not-for-profits Commission of any breaches of obligations.
- d) Ensure elevated risks steps are observed when:
 - Working in environments assessed to be high risk through our risk management review;
 - Where partner organisations have been observed using weak financial controls during initial capacity assessments or subsequent partnership reviews; or
 - The beneficiaries of development or humanitarian aid are unclear.
- e) Where elevated risk procedures are enacted, RainShine will:
 - Increase the frequency of screening partner organisations and their sub-contractors against the external lists identified in this policy to monthly checks;

- Escalate financial reporting requirements (for example, to monthly and/or quarterly reports); or,
- Escalate in-country reviews of programs and processes annually (for example, to monthly and/or quarterly reports).

Breaches in this policy can lead to disciplinary action including possible dismissal and criminal proceedings and where required agreements may be terminated.

AUTHORISATION

I, (insert name) acknowledge that I have read, understand and agree to comply with RainShine USA/Australia’s Anti-Terrorism and Anti Money Laundering Policy.

I understand and agree that it is my responsibility, as a person employed/engaged by RainShine USA / Australia, to avoid actions that would result in the provision of funds to individuals or organisations that engage in money laundering or terrorism.

I understand and agree that a breach of the Policy may provide grounds for my employment /engagement with RainShine USA / Australia to be terminated.

I also understand that a breach of the Policy could result in criminal prosecution. I authorise RainShine USA / Australia to undertake any necessary inquiries, including criminal record checks and reference checks, as part of my appointment or recruitment process.

Name:

Position:

Signed:

Date: