

# COUNTERTERRORISM AND ANTI-MONEY LAUNDERING POLICY

Document Control	
Approved By	AmplifyChange Directors
Responsible Owner:	CEO, Operations Manager
Created:	1 June 2021
Revised:	
Approved:	
Next Review:	
Version	1





## Table of Contents

**1. Policy** ..... 3

Photo credit: Nifin'Akanga



## 1. Policy

AmplifyChange works for a more healthy, equitable, inclusive, safe and sustainable world. Much of our work focuses on reaching poor and vulnerable people often living in fragile and conflict-affected states. Terrorists and known terror organisations operate in some of the areas where we support projects.

We recognise that this implies increased risks of misappropriation of funds and resources that could support terrorist activities in the geographical areas where our grantees work. We take seriously our obligations to ensure that monies and funds received from all clients and donors must not be misappropriated or utilised to support criminal or terrorist purposes or in any way that breaches applicable sanctions.

AmplifyChange does not provide grants to, or partner with any organisation(s), where there are risks that partner organisation(s) and/or related individuals could have links to terrorism or terrorist activities.

This policy applies to all our operations unless local legal requirements are more rigorous. We will assess the risks of becoming involved with terrorism and money laundering and of breaching applicable sanctions in connection with, among others, during our due diligence, pre-contracting and grantee reporting processes and put in place proportionate measures to manage those risks, while continuing to support grantees in difficult and challenging places.

AmplifyChange is committed to ensuring that:

- Systems, procedures and controls are in place to manage the risk of becoming involved in financing or supporting terrorist activity, money laundering, or breaching sanctions,
- Robust and real time intelligence on terrorism risks is available for the countries that our grantees operate in,
- External guidance and support is available to ensure that key organisational and grantee specific risks (where required) are identified and assessed,
- Financial and integrity due diligence checks are conducted on any potential grantees and/or partners and key persons within such organisations,
- Funds are not released by AmplifyChange unless grantees, staff, consultants, contractors, suppliers, or any other intended recipients complete and provide documentation confirming legitimate

identities/business/organisational registration,

- Checks are conducted on grantees, staff and other resources (consultants, contractors, suppliers, etc.) to confirm that those we partner and work with or who receive funds from AmplifyChange are not on any lists of terrorist groups or persons, financial sanctions lists, or other regulatory compliance lists,
- Staff are made aware of their obligations to report any actual or suspected terrorist activity or money laundering,
- Training is provided to staff and other resources so that they have an awareness of the risks related to terrorist activity, money laundering, and breaching sanctions, and
- That we meet our obligations to report to external authorities without any undue delay.

AmplifyChange requires all those working with or receiving funding from us to act in accordance with this policy to ensure that our funds are not used to finance or support terrorist activity or to launder money. We will provide adequate and appropriate resources to implement this policy and will ensure it is communicated and understood.

AmplifyChange will review this global policy statement annually to reflect new legal and regulatory developments and ensure good practice.