



ACCEPTED
by the TBEC Board
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A handwritten signature in blue ink, which appears to be "P. Sommerfeld", is written over a thin horizontal line.

Paul Sommerfeld,
Chair of TBEC Board

ANTI-TERRORISM AND ANTI- MONEY LAUNDERING POLICY

OF STICHTING TB EUROPE COALITION



ANTI-TERRORISM AND ANTI-MONEY LAUNDERING POLICY OF STICHTING TB EUROPE COALITION

1. Introduction

Stichting TB Europe Coalition (“TBEC”) denounces all forms of terrorism and will never knowingly support, tolerate or encourage terrorism or the related activities, including financing of terrorism or money laundering. TBEC is firmly committed to the international fight against terrorism and recognizes the applicable legislation relating to anti-terrorism and the fight against money laundering. TBEC is determined to prevent its funds from being used directly or indirectly for terrorist activities and to prevent that the proceeds of crime can be washed through TBEC.

2. Definitions

The following definitions apply within the framework of this Policy:

- **Terrorism** means a socially dangerous activity that consists in the deliberate, purposeful use of violence by taking hostages, arson, murder, torture, intimidation of the population and authorities or committing other attacks on the life or health of innocent people or threatening to commit criminal acts in order to achieve criminal goals;
- **Terrorist act** means the use of a weapon, the commission of an explosion, arson, or other actions that create a danger to human life or health or cause significant property damage or the occurrence of other serious consequences, if such actions are committed with the aim of violating public safety, intimidating the population, provoking a military conflict, international complication, or with the aim of influencing decision-making or taking or not taking actions by state authorities or local self-government bodies, officials of these bodies, associations of citizens, legal entities, international organizations, or drawing public attention to certain political, religious or other views of the perpetrator (terrorist), as well as the threat of committing the specified actions with the same goal. Advocating, protesting, dissenting or taking industrial action are not terrorist acts where the person doing the activity does not intend to cause serious harm to a person or create a serious risk to public safety;
- **Terrorist group** means a group of two or more persons who have united for the purpose of carrying out terrorist acts;
- **Terrorist organization** means a stable association of three or more persons, which was created for the purpose of carrying out terrorist activities, within which the division of functions was carried out, certain rules of conduct were established, which are mandatory for these persons during the preparation and commission of terrorist acts. An organization is recognized as terrorist if at least one of its structural units carries out terrorist activities with the knowledge of at least one of the leaders (management bodies) of the entire organization;
- **Financing of terrorism** means provision or collection of any assets directly or indirectly for the purpose of their use or in awareness of the possibility that they will be used in whole or in part:
 - for any purpose by an individual terrorist or terrorist group (organization);
 - for the organization, preparation or commission of a terrorist act, involvement in the commission of a terrorist act, public calls for the commission of a terrorist act, creation of a terrorist group (organization), assistance in the commission of a terrorist act, training in terrorism, crossing the state border with a terrorist purpose, carrying out any other terrorist activities, as well as attempts to commit such actions;
- **Money laundering** means legalization (laundering) of proceeds obtained through crime and includes any actions related to the execution of a financial transaction or a contract with



proceeds obtained through crime, as well as the execution of actions aimed at hiding or masking the illegal origin of such proceeds, or possession of them, the rights to such incomes, sources of their origin, location, movement, change of their form (transformation), as well as acquisition, possession or use of incomes obtained by criminal means.

3. Policy Statement and Objectives

3.1. TBEC 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.

3.2. Funds that are diverted to terrorist organizations or used for criminal acts are funds that do not reach the intended projects, programs and beneficiaries and, therefore, the most vulnerable will suffer. Further to this, suggestions that an NGO is linked to terrorism or money laundering in any way can be damaging to its reputation and undermine the trust and support of beneficiaries, partners, the wider public and donors. Thus, the objective of this Policy is to prevent TBEC financing terrorism and being used as a vehicle for money laundering.

4. Principles

TBEC applies the following main principles related to the fight against terrorism and money laundering:

- **Commitment against terrorism and money laundering:** TBEC refuses to directly or indirectly support any terrorist or money laundering action and commits to minimize the risks of participation in terrorism or money laundering in the implementation of its activities;
- **Transparency and responsibility:** TBEC is committed to being fully accountable and transparent to its donors, partners and other stakeholders by providing access to information on the use of its funds. TBEC is committed to having all the necessary tools in hand to ensure the appropriate management of its operations;
- **Professionalism:** TBEC bases its programs on high standards of professionalism, and capitalizes on its experiences in order to maximize its efficiency and the use of its resources.

5. Scope

The Policy applies to all governance and staff members as well as consultants of TBEC. All partners and suppliers are subject to the measures to prevent financing terrorism and/or money laundering.

6. Prevention

6.1. Participation in acts of terrorism and money laundering, as defined in this Policy, can be most effectively avoided by creating an effective organizational culture focused on the prudent and controlled use of funds. TBEC 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 stipulated in TBEC's policies and procedures.

6.2. In particular, TBEC applies the following measures:

- Identification and analysis of risk factors throughout the relevant project cycle or the supply chain, recognition of their probability, understanding of the consequences and implementation of appropriate countermeasures, including through established internal control and reporting systems;



- Application of a strict Code of Ethics and Conduct among its staff and other relevant persons, other relevant policies and procedures in the areas of finance, procurement, administration and asset management;
- Informing TBEC's members of governing bodies, staff, consultants and partners on policies, procedures and practices to combat embezzlement, money laundering and acts of terrorism;
- Implementation of proper internal control, including due segregation of duties, when responsibilities in key financial processes are separated among several employees rather than entrusted to one employee. Signatures and/or system workflow approvals are required at different stages in any financial transaction process in order to avoid unauthorized transactions;
- Proper budget management and maintenance of complete financial records that account for all expenditures. All income and expenditure is linked to donor/source coding and all program expenditure is linked to specific projects. TBEC retains all supporting documentation (receipts, invoices and supporting documents) in line with legislative and donor requirements;
- Proper cash and bank management. Controls include monthly bank reconciliations, authorization levels to carry out financial operations, segregation of duties, signatures/system approvals;
- Publication of annual financial statements with a detailed breakdown of revenues and expenses;
- Conduct of required external audits as well as external verifications of specific projects;
- TBEC's right to check, when appropriate, the references of third parties with whom TBEC has a contractual relationship in order to ensure that these persons are not associated with terrorism and do not appear on the available lists of fight against terrorism;
- Ensuring 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.

7. Duty to Report

7.1. TBEC's members of governing bodies, staff and consultants are personally liable for being attentive to any actual or potential terrorist offenses or money laundering and taking measures to avoid such an act.

7.2. If TBEC's members of governing bodies, staff and consultants are offered an act that may participate in or constitute a terrorist or money laundering offense 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 in accordance with this Policy.

7.3. In case of suspicion of activity related to terrorism and/or money laundering as defined in this Policy, TBEC's staff and consultants have to report it to his or her line manager and/or to TBEC's



Executive Director. TBEC encourages any other persons and stakeholders to report suspected terrorist or money laundering activities by confidential means via email available to TBEC's Executive Director.

7.4. No person shall suffer from their refusal to pay or receive litigious funds or from an ethical alert made in good faith.

7.5. TBEC considers the safety and security of its members of governing bodies, staff and consultants 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, they must not endanger themselves or others by strictly complying with this Policy. TBEC strives to prevent its members of governing bodies, staff and consultants from being victims of such situations. However, if they do occur, these incidents must be reported.

7.6. TBEC undertakes to notify the donor if a link is discovered between funds and an organization linked to terrorism or money laundering activity according to the mechanisms agreed with the latter.

8. Investigation

TBEC undertakes to investigate the reported activity in accordance with the investigation procedure established by TBEC's Anti-Fraud, Bribery and Corruption Policy (sec. 4.3).

9. Responsive Measures Following Investigation

If the investigation conducted internally by TBEC demonstrates the existence of a proven offense related to terrorism or money laundering, the investigation commission shall inform TBEC's Executive Director and propose appropriate measures to be implemented, such as those established by TBEC's Anti-Fraud, Bribery and Corruption Policy (sec. 5), as well as the filing of a report/complaint with the competent law enforcement authorities.

10. Roles and Responsibilities

TBEC's Executive Director is responsible for the oversight of this Policy and its implementation as well as for promoting transparency within the organization.