



# COUNTER TERRORISM POLICY

## DEFINITION

The Australian Government has identified that not-for-profit organisations, such as *Wantaim PNG*, are at risk of being misused by individuals or other organisations to finance or support terrorist activity. There are a number of ways that this can occur, including fraudulent collection of monies and infiltration by terrorists.

## GOAL

*Wantaim PNG* considers any form of terrorism or terrorism financing unacceptable and will make all reasonable efforts to ensure that funds are not being directed to terrorist activities. This includes providing funds to a listed individual or organisation, or an organisation which is suspected as being a terrorist organisation (or having links with a terrorist organisation), even if it does not appear as a listed individual or organisation.

## LEGAL OBLIGATIONS

Like all Australian legal and natural persons, Australian not-for-profit organisations, which include *Wantaim PNG*, must comply with Australian laws. This includes ensuring that finances will not be used to support terrorism either in Australia or in *Wantaim PNG*'s partner country Papua New Guinea. *Wantaim PNG* will immediately report any suspicious activity to the Australian Federal Police.

## EVIDENCE OF AWARENESS OF COUNTER TERRORISM POLICY

*Wantaim PNG* Executive Committee members will be provided with the Counter Terrorism Policy on commencing their association with *Wantaim PNG* and on updating of this document. All members aim to take all reasonable measures to ensure funds distributed by *Wantaim PNG* are not used for terrorism financing.

## REVIEWING THIS POLICY

This policy will be reviewed every five years or as deemed necessary to assess its effectiveness, appropriateness and accuracy.



Wantaim PNG

## POLICY AUTHORISATION

Policy Owner	President <i>Wantaim PNG</i>
Approved By	Executive Committee <i>Wantaim PNG</i>
Approval Date	06.07.2023
Review Date	no later than 30.06.2028

## POLICY

In undertaking development *Wantaim PNG* will aim to ensure that:

- It doesn't deal with any individual or organisation which appears on either of the following lists<sup>1</sup>:
  - 'The Consolidated List', which is a list of all persons and entities subject to targeted financial sanctions under United Nations Security Council decisions and maintained by the Department of Foreign Affairs and Trade pursuant to the Charter of the United Nations (Dealing with Assets) Regulations 2008. This list is available at <http://www.dfat.gov.au/sanctions/>
  - The 'List of Terrorist Organisations', which is compiled by the Attorney-General's Department and lists organisations which have been proscribed by the Australian Government as terrorist organisations under the Criminal Code because they advocate the doing of a terrorist act (regardless of whether or not a terrorist attack occurs), or because they are directly or indirectly engaged in preparing, planning, assisting in or fostering the doing of a terrorist act (regardless of whether or not a terrorist attack occurs). This list is available at <http://www.nationalsecurity.gov.au/Listedterroristorganisations/Pages/default.aspx>
- All funds allocated to any development project will be directed to the providers of goods and services, either via electronic bank transfer or via cash payment by an Executive Committee member (or Executive Committee approved local coordinator). In no case will money be handed over or transferred electronically to a beneficiary of any development project - thus minimising the level of risk involved with distribution. No other funding route is available.
- The *Wantaim PNG* Treasurer will only allocate funds to any development project approved by the Executive Committee.

---

<sup>1</sup> It is an offence under Australian law to use or deal with an asset owned or controlled by, or to make an asset available to, a person or entity included on one of these lists.



- A remittance advice is required by *Wantaim PNG* that the nominated funds have been received by the relevant provider of goods and services. This process is audited annually.
- The *Wantaim PNG* Executive Committee members need to be aware of the risks of terrorism financing and maintain compliance with the prescribed donations processing protocol.
- Any change in the processing procedure of allocated funds will be communicated immediately to the *Wantaim PNG* Executive Committee.