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 two years to assess its effectiveness, appropriateness and accuracy.

POLICY AUTHORISATION
Policy Owner President Wantaim PNG
Approved By Executive Committee Wantaim PNG
Approval Date 18.11.2018
Review Date no later than 17.11.2020
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:\(^1\):
  - 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](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.

- 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.

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\(^1\) 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.