

CBM Global Policy Counter Terrorism and Anti- Money Laundering

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CBM Global Disability Inclusion

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<https://cbm-global.org>

Introduction

CBM Global is committed to ensuring that aid goes to those who need it and for whom it is intended and that our assistance **is not diverted or subject to any manipulation**. We are committed to upholding domestic and international laws and donor agreements that regulate our operations.

CBM Global has a zero-tolerance policy towards supporting or financing terrorist or money laundering activities. Such activities are contrary to the vision, mission and values of CBM Global and to our Code of Conduct. Zero tolerance means that CBM Global does not tolerate supporting or financing terrorist activities or money laundering in relation to any of our work and that all suspicions of breach and effective breach of this policy must be reported immediately to CBM Global. CBM Global takes all suspicions or proof of supporting or financing terrorist activities or money laundering seriously and will assess, act upon, investigate and discipline all such cases as appropriate and in a professional, transparent, and fair manner.

Indications that CBM Global, any of its employees or any of the 3rd parties it actively engages with, are linked to supporting or financing terrorist activities or money laundering **can be damaging to CBM Global's values, reputation, undermining the morale of our staff and the trust and support** of programme participants, partners, donors and the wider public. Supporting or financing terrorist activities or money laundering also **poses legal risks** both for the organization and individuals involved. We must act, and be seen to act, in a way that is honest and transparent.

The Policy on Counter Terrorism & Anti-Money Laundering will be reviewed as deemed necessary to ensure its content reflects current needs and international best practices.

Definitions

The United Nations define **terrorism** as criminal acts, including against civilians, committed with the intent to cause death or serious bodily injury, or taking of hostages, with the purpose to provoke a state of terror in the general public or in a group of persons or particular persons, intimidate a population or compel a government or an international organization to do or to abstain from doing any act.

According to the United States Treasury Department, **money laundering** generally refers to financial transactions in which criminals, including terrorist organizations, attempt to disguise the proceeds, sources or nature of their illicit activities. Typically, it involves three steps: placement, layering, and integration. First, illegitimate funds are furtively introduced into the legitimate financial system. Then, the money is moved around to create confusion, sometimes by wiring or transferring through numerous accounts. Finally, it is integrated into the financial system through additional transactions until "dirty money" appears "clean".

Scope and Liability

Compliance with this policy is **mandatory for staff, Board members, implementing partners, contractors and related third parties**. Failure to do so will result in disciplinary action up to and including the possibility of termination of employment or termination of the violating party's contract and/or business relationship with CBM Global. CBM Global furthermore reserves the right, without prejudice to any other right or remedy available to it, to take such additional action, civil and/or criminal, as may be appropriate.

CBM Global Members are also required to comply with this policy. They are invited to adopt the policy if they do not have in place a policy of a similar standard and are requested to ensure their existing policies align with this policy.

Policy Statement

Rules

1. **Supporting or financing terrorist activities or engaging in money laundering** on the part of any CBM Global employee or board member or any third party we (intend to) engage with (partner, consultant, supplier etc.) **is prohibited**. This policy is incorporated by reference in all employment and 3rd party contracts.

Prevention of supporting or financing terrorist activities or money laundering

2. CBM Global will foster **an organizational culture** in which supporting or financing terrorist activities or engaging in money laundering is never acceptable and will not be tolerated.
3. CBM Global will ensure employees, board members, partners or other third parties that engage with CBM Global are made **aware of this policy** and it is the responsibility of CBM Global to **provide relevant training**.

Consequences

4. Employees of CBM Global, as well as members of the board who support or finance terrorist activities or engage in money laundering or fail to report knowledge of supporting or financing of terrorist activities or money laundering will be **subject to disciplinary action up to and including termination** of employment or board membership respectively. Third parties who fail to comply with this policy will have their agreements and/or contracts with CBM Global terminated. CBM Global will seek restitution or prosecution or other legal remedies as appropriate.

Reporting and investigating the support to or financing of terrorist activities or money laundering

5. CBM Global has a **Whistleblowing Policy** which provides employees, partners, board members and third parties with a **confidential reporting mechanism** if the person is not comfortable reporting to report the incident through the management line. It ensures that anyone who reveals the support to or financing of terrorist activities or

money laundering in CBM Global operations is protected from reprisals. CBM Global encourages such reporting. CBM Global welcomes employees, board members, partners and 3rd parties to address their concerns and will not penalize anyone who in good faith has made a protest or raised a complaint against some practice in CBM Global, or of another individual or entity with whom CBM Global has a business relationship.

6. Any **reported incidents** of suspected and actual support to or financing of terrorist activities or money laundering will immediately **be forwarded to the Finance Director**, for follow up according to the **Critical Issue Process**. The Finance Director assesses which other CBM Global departments or parties should be notified (e.g. Board committees, funding Member(s), Human Resources Department or external bodies). If the report is in relation to allegations which involve the Finance Director, it should be addressed to the Executive Director or the Board of Directors.

CBM Global understands that **confidentiality is important** to those who report on these types of sensitive issues and those who are potentially accused of such activities. The CBM Global investigation team will make a reasonable effort to ensure that their identities will be kept confidential and no identifiable information will be shared beyond the investigation team, without the informed consent of the person(s) concerned. CBM Global will ensure the complainant details (specifically any identifying information) are securely filed and only accessible to the CBM Global personnel who handle the case. The same is true for any person accused, particularly if allegations have not been proven and the disclosure is not required in cases where any legal action needs to be taken.

Responsibilities

The **CBM Global Executive Director and Global Management Team** have the **responsibility and authority to take actions** as necessary **to ensure the effective implementation** of this policy.

All CBM Global staff, board members and volunteers

Where staff or volunteers suspect that CBM Global funds or assets have been, are, or will be lost through supporting or financing terrorist activities or money laundering as defined above, **they must report it to their line manager without delay**. If it would be inappropriate to report to the line manager, they may report it to their line manager's manager. If they do not want to report it through the management line, they may report it directly to the Finance Director. If the report is in relation to allegations which involve the Finance Director, it should be addressed to the Executive Director or the Board of Directors (or by using the whistleblowing portal which allows for anonymous reporting if desired: <https://cbm-global.org/contact-us>).

Board members should **report directly to the Finance Director**.

All managers

Where a manager receives a report of a suspicion, or they suspect the support to or financing of terrorist activities or money laundering themselves, **they must report it without delay to the Finance Director**.

Managers are responsible and accountable for managing the risk of support to or financing of terrorist activities or money laundering in their units. They may do this by:

- Ensuring that there are adequate, appropriate and robust internal controls in place and/or are upheld to make sure all funds are accounted for and spent in line with CBM Global guidelines;
- Keeping proper and adequate business and financial records for both the receipt and use of all funds together with audit trails of decisions made;
- Taking any necessary action to protect CBM Global funds;
- Acting responsibly and within the interests of CBM Global if a suspicion occurs;
- Ensuring that support to or financing of terrorist activities or money laundering are assessed and included in strategic risk management documents;
- Taking the lead in creating a culture which promotes CBM Global's values and Code of Conduct, with zero tolerance towards supporting or financing terrorism and money laundering.

Country Finance Managers

In addition to the responsibilities of all managers, the Country Finance Managers **should support all managers in their Country Team to make sure that this policy is understood.**

Country Directors

Country Directors are **responsible and accountable for managing the risk of supporting or financing terrorist activities or money laundering in their countries** by:

- Gaining and maintaining staff confidence in the well-functioning of reporting mechanisms;
- Ensuring that the risks of support to or financing of terrorist activities or money laundering are assessed and included in the country strategic risk management documents;
- Taking the lead in creating a counter terrorism & anti money laundering culture in their team;
- Supporting the Finance Director in actively managing and investigating reported cases in their countries;
- Ensuring all partners in their countries are aware of this policy and its relevance to their relationship with CBM Global, in keeping with CBM Global's Code of Conduct and values, and their obligations as outlined in project contracts.

CBM Global partners

It is the responsibility of partner organizations to:

- Comply with their contractual obligation to abide by this policy;
- Have effective control procedures and policies in place to reduce the opportunity of

support to or financing of terrorist activities or money laundering within their organizations;

- Report any suspected or confirmed support to or financing of terrorist activities or money laundering immediately (as required by project contracts signed with CBM Global).

Key references and supporting documents

All documents mentioned above are available to CBM Global Federation staff on [Global Connect](#). Documents that are relevant for external audiences can be found on www.cbm-global.org.

- CBM Global Code of Conduct
- CBM Global Policy - Whistleblowing
- CBM Global Process Guide Whistleblowing (internal)
- CBM Global Critical Issue Process (internal)