

**Ethiopian Orthodox Tewahido Church
Development And Inter-Church Aid Commission(EOC-DICAC)**



Anti-Terrorism and Anti Money Laundering Policy

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I. INTRODUCTION

Independent, non-profit, EOC-DICAC is an Ethiopian nongovernmental organisation established in the year 1972 G.C. and re-register under the proclamation number 1113/2011 in July 2019 with registry No. 1560. The purpose of establishment of the commission is to provide humanitarian assistance to people affected by human and natural calamities and implementation sustainable development programmes in all over the nation targeted to benefit the most needy community groups.

As an independent organization, the commission respects impartiality, and operates following the principles of human dignity, accountability, transparency and partnership. The value of EOC-DICAC are fundamentally rooted in the value of the church. Therefore, EOC-DICAC bears concrete witness to the truth of the gospel of Our Lord Jesus Christ which is enshrined in the following teachings of the Holy Bible.

The commitment of EOC-DICAC is guided by core values. These are

- *"I want you to share your food with the hungry and bring right to your homes those who are helpless, poor and destitute." (Is. 58:7)*
- *"He who does not work shall not eat" (2 Thes. 3:10)*

A. Policy Statement

EOTC-DICAC 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. To this end, EOTC-DICAC'S Anti-Terrorism and Anti-Money Laundering Policy:

- Encourages prevention;
- Promotes detection;
- Sets out a clear investigation procedure;
- Sets out a mechanism of sanctions.

This policy is aimed at guiding EOTC-DICAC staff and partners, and must be considered together with:

- EOC-DICAC'S Code of Conduct;
- EOC-DICAC'S Anti-Fraud, Bribery and Corruption Policy;
- EOC-DICAC'S Child Protection Policy;
- EOC-DICAC'S Conflict of Interest Prevention Policy;
- EOC-DICAC'S Data Protection Policy;
- EOC-DICAC'S Health And Safety Policy;
- EOC-DICAC'S manuals and guidelines e.g. Finance, Administration & Human Resources Development Policy and Audit and Inspection Policy

B. Principle in Fight Against Terrorism And Money Laundering

EOC-DICAC is based on 3 main principles related to the fight against terrorism and money



laundering:

Commitment Against Terrorism And Money Laundering: EOC-DICAC 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: EOC-DICAC is committed to being fully accountable and transparent to its beneficiaries, partners, suppliers and donors, by providing access to information on the use of its funds. The organization is committed to having all the necessary tools in hand to ensure the appropriate management of its operations.

Professionalism: EOC-DICAC bases the conceptualization, implementation, management and evaluation of its programmes on high standards of professionalism, and capitalizes on its experiences in order to maximize its efficiency and the use of its resources

A. Policy Statement

EOC-DICAC renounces all forms of terrorism and will never knowingly support, tolerate or encourage terrorism or the activities of those who embrace and or finance terrorism finance terrorism. Consistent with numerous United Nations Security Council resolutions, including S/RES/1269 (1999), S/RES/1368 (2001), S/RES/1373 (2001) and the international instruments, EOC-DICAC is firmly committed to the international fight against terrorism, and money laundering. EOC-DICAC recognizes national legislation relating to anti-terrorism and the fight against money laundering and the rules with which donor countries comply and it is EOC-DICAC'S policy to ensure that none of its funds and those of its donors are used, directly or indirectly, to support individuals or entities associated with terrorism or to launder funds derived from illegal activities.

II. INTERPRETATION AND APPLICATION

1-Scope of Application

- 1.1. This policy applies to all EOC-DICAC staff and EOC-DICAC governance members particularly the board.
- 1.2. The provisions of this policy may also be applies in particular to consultants, entities contractors, suppliers and sub-grantees, partner organsations staff, board members that implements projects or activities through EOC-DICAC.

2-Definitions

Act of terrorism: for the purpose of this policy, «act of terrorism» means any act



constituting a grave breach, or its funding or laundering of the funds derived from such breach when it is intended to kill or seriously wound a civilian, or any other person that does not take a direct part in hostilities in a situation of armed conflict when, by its nature or context, this act is intended to intimidate a population or to compel a government or an international organization to do or refrain from doing any act.

Funding of terrorist activities: For the purposes of this policy, the "funding of terrorist activities" means the provision or raising of funds, by any means, directly or indirectly, unlawfully and deliberately, with the intent that such funds be used or with knowledge that they will be used, in whole or in part, directly or indirectly, to commit a terrorist offence or to contribute to the commission of such offence.

Money laundering of funds derived from terrorist activities : for the purposes of this policy, the "money laundering of funds derived from terrorist activities" means facilitating, by any means, the false justification of the origin of the property or income of the perpetrator of a terrorist offence, having provided the perpetrator with a direct or indirect benefit, but also assisting in the placement, concealment or conversion of the direct or indirect yields of an offence with the knowledge that such transactions or their yields are intended to be used or have been used, in whole or in part, for terrorist purposes or will benefit terrorist groups.

Money laundering: for the purposes of this policy, "money laundering" means facilitating, by any means, the false justification of the origin of the property or income of an offender that has yielded a direct or indirect profit, but also assisting in the placement, concealment or conversion of the direct or indirect yields of an offence. Thus, donations or payments that are part of a loan or are subject to unusual conditions may be classified as money laundering.

Participation in the activities of a terrorist group: for the purposes of this policy, "participation in the activities of a terrorist group" means the provision of information or material resources, or any form of financing the activities of a terrorist group, with the knowledge that such participation will contribute to the criminal activities of the terrorist group.

Terrorist group: for the purposes of this policy, a "terrorist group" is defined as a structured group of more than two persons, established for a period of time and acting in concert to commit terrorist offences; "structured group" means a group that is not randomly formed for the immediate commission of an offence and that does not need to have formally defined roles for its members, continuity of its membership or a developed structure. The terrorist groups targeted by this policy are those defined in the sanctions lists recognised by donors.



Material support for terrorism: for the purposes of this policy, "material support for terrorism" refers to the supply or movement of services, assets and property, including trade transactions such as the sale, acquisition or exchange of a cultural object of archaeological, artistic, historical or scientific interest illegally removed from an area controlled by a terrorist group at the time of the removal, through persons engaging in or acting as intermediaries if the support in question is performed with the knowledge that such operations or the proceeds thereof are intended to be used, in full or in part, for the purpose of terrorism or will benefit terrorist groups. to, or interest in, such assets, including, but not limited to, bank credits, travellers cheques, bank cheques, money orders, shares, securities, bonds, drafts, letters of credit,.

Beneficiaries: for the purposes of this policy, "beneficiaries" are all persons who benefit, directly or indirectly, from EOC-DICAC'S programmes.

Consultant: for the purposes of this policy, a "consultant" is a third party, individual or group, with or without legal personality, who directly or indirectly provides any type of consulting services to EOC-DICAC, whether for a fee or not.

Governance: governance refers to any person elected by decision making bodies of the commission. In particular, the members of board are governance members.

Stakeholders: for the purposes of this policy, "stakeholders" are individuals or groups, with or without a legal personality, who directly or indirectly, voluntarily or involuntarily, contribute to, participate in or benefit, in any way, from the actions, programmes and activities of EOTC-DICAC.

EOC-DICAC staff: for the purposes of this policy, the term "EOC-DICAC staff" refers to any person employed by EOC-DICAC.

Sub-grantee: for the purposes of this policy, a "sub-grantee" is an individual or a group, with or without legal personality, who receives a budget to carry out a project or activity.

Supplier: for the purposes of this policy, a "supplier" is a third party, individual or group, with or without legal personality, who, directly or indirectly, provides any type of goods and/or services to EOC-DICAC, whether for a fee or not.

Funds: For the purposes of this policy, "funds" refer to assets of every kind, whether tangible or intangible, movable or immovable, however acquired, and legal documents or instruments in any form, including electronic or digital, evidencing title.

3-Information and Adherence to the Policy

3.1. This policy is published under the authority of EOC-DICAC. EOC-DICAC staff, as well as the other entities referred to in no 1 of part II of this policy, are required to conduct themselves in accordance with this policy and must therefore be aware and have understood of its provisions and of any changes. When they are unsure of how to



proceed, they should seek the advice of a competent person, notably their line manager.

3.2. EOC-DICAC staff, as well as the other entities referred to in no. 1 of this policy, who negotiate the working conditions of EOC-DICAC staff as well as any type of contracts concluded with and by external entities referred to in no 1 of this policy, must include a provision specifying that this policy must be respected and that it forms part of these conditions.

3.3. It is the responsibility of EOC-DICAC staff with managerial responsibilities, as well as the other entities referred to in no 1 of part II of this policy, to ensure that staff under their supervision comply with this policy; and to take or propose appropriate disciplinary or judiciary measures as sanction against any violations of its provisions.

3.4. This policy shall form part of the working conditions of EOC-DICAC staff and the conditions for the performance of the missions of the other entities referred to in no. 1 part II of this policy from the moment they certify that they have read it. EOC-DICAC will review the provisions of this policy at regular intervals.

4-Purpose Of The Policy

The purpose of this policy is to:

- 4.1. Implement mechanisms to combat terrorism and money laundering through prevention, reporting, action, investigation and sanction mechanisms applicable to EOC-DICAC staff and other entities mentioned in Article 1 of this policy.
- 4.2. Specify the rules relating to the fight against terrorism and money laundering that EOC-DICAC staff and other entities referred to in no. 1 of part II of this policy must observe.
- 4.3. Inform third parties of the conduct they are entitled to expect from EOC-DICAC staff and other entities referred to in no. 1 of part II of this policy.

III. MECHANISMS TO FIGHT TERRORISM AND MONEY LAUNDERING

A. mechanisms to prevent the participation and implementation of terrorist acts and money laundering

5-Prohibition of Any Act of Terrorism Or Money Laundering

EOTC-DICAC staff and other entities referred to in no. 2 of part II of this policy shall not participate, directly or indirectly, in an act of terrorism or an act of money laundering within the meaning of this policy.

6-Importance Of Prevention



Fully aware that 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 raised within the organization's mandate, EOC-DICAC has developed a series of preventive mechanisms and internal control systems, aimed at preventing and identifying acts involved in the implementation and financing of terrorism and money laundering, including those in the Finance, Logistics, Human Resources, Security, Audit and Monitoring & Evaluation manuals. EOC-DICAC'S procedures place a strong emphasis on deterrence, detection, prevention and intervention.

7-Prevention And Identification Mechanism

- 7.1. In order to minimize the risk of misuse of aid that may contribute to the financing of terrorism and/or money laundering, especially when they are the proceeds of acts of terrorism, EOC-DICAC uses the following approach:
- 7.2. Conduct regular risk analyses of anti-terrorist and anti-money laundering activities. Risk analysis generally includes a review of relevant legal requirements of donor and host governments, as well as donor policies.
- 7.3. It also includes security analyses, including stakeholder analyses (armed groups, state and non-state actors), to determine the risk that terrorism targets or weakens our operations.
- 7.4. Identify risk factors throughout the project or programme cycle and throughout the supply chain, recognise their probability, understand the consequences and implement appropriate countermeasures, through established internal control and reporting systems.
- 7.5. Apply a strict code of conduct among its staff and the staff of the other entities referred to in Article 1 of this policy, which includes a strong reference to the fight against embezzlement and money laundering and a declaration on financial transactions with armed groups.
- 7.6. To provide EOC-DICAC staff and other entities referred to in Article 1 of this policy with a good understanding and clear direction and to encourage them to take ownership of EOC-DICAC'S values and policies.
- 7.7. Maintain complete financial records that account for all expenditures and publish annual financial statements with a detailed breakdown of revenues and expenses.
- 7.8. Conduct an annual external audit of all expenditures as well as external verifications of specific projects.



- 7.9. Reserving the right to check the references of third parties with whom EOTC-DICAC has a contractual relationship in order to ensure that these persons are not associated with terrorism and do not appear on the lists of fight against terrorism.
- 7.10. Regularly train its staff and implementing partners on policies, procedures and practices to combat embezzlement, money laundering and acts of terrorism. In addition, staff and partners must be able to identify any payments or donations that may be suspicious and be familiar with EOTC-DICAC'S adequate internal reporting, validation and alert procedures.
- 7.11. Ensure that field teams maintain 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.
- 7.12. Apply the principle of supplier knowledge to all calls for tenders.

B. Duty To Report

8-Reporting Obligation

In case of suspicion of activity related to terrorism and/or money laundering as defined in this policy, EOTC-DICAC:

- 8.1. Encourages stakeholders to report suspected terrorist or money laundering activities by confidential means via telephone, fax, email or any possible means for concerned body.
- 8.2. Undertakes to investigate in accordance with EOTC-DICAC'S policy on the fight against terrorism and money laundering and to take the necessary measures;
- 8.3. Undertakes to notify the donor if a link is uncovered between funds and an organisation linked to terrorism or money laundering according to mechanisms agreed with the latter

C. CONDUCT IN THE EVENT OF TERRORIST OFFENCES OR MONEY LAUNDERING

9-Conduct in the event of terrorist offence or money laundering

- 9.1. Since EOTC-DICAC staff and the other entities referred to in no. 1 of part II of this policy are generally the only ones who know if they are confronted with a terrorist or money laundering attempt or offence, they are personally liable for:
- Being attentive to any actual or potential terrorist offences or money laundering;
 - Taking measures to avoid such an act;
 - In accordance with Article 18 of this policy, informing his or her line manager



- and/or personal contact within EOC-DICAC and Government bodies of any terrorist offences or money laundering as soon as he or she becomes aware of it;
- Complying with any final decision requiring him/her to withdraw from the situation giving rise to such an act.
- 9.2. If EOTC-DICAC staff and other entities referred to in Article 1 of this policy are offered an act that may participate in or constitute a terrorist or money laundering offence 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;
 - 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 to his/her line manager or to his/her personal contact within EOC-DICAC ;
 - In accordance with No. 8 of this policy, report the attempt as soon as possible to his/her line manager or to his/her personal contact within EOC-DICAC and in any case through telephone, fax, email or any possible means.
- 9.3. No EOC-DICAC staff and other entities referred to in Article 1 of this policy shall suffer from their refusal to pay or receive litigious funds or from an ethical alert made in good faith.
- 9.4. EOC-DICAC considers the safety and security of its staff 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, EOC-DICAC staff and other entities referred to in no. 1 of part II of this policy must not endanger themselves or others by strictly complying with this policy. EOC-DICAC strives to prevent its staff from being victims of such situations. However, if they do occur, these incidents must be reported.
- 9.5. EOC-DICAC undertakes to notify the donor if a link is discovered between funds and an organisation linked to terrorism or money laundering activity according to the mechanisms agreed with the latter.

D. EOC-DICAC'S Investigations Mechanisms

10- Investigation by EOC-DICAC

- 10.1. In accordance with Article 18 of this policy, EOC-DICAC staff and other entities referred to in Article 1 of this policy must inform his or her line manager and/or personal contact within EOC-DICAC and in any case Government bodies of any suspicions of terrorist



offences or money laundering as defined in this policy

10.2. An e-mail reply is sent by nominator upon receipt of the alert, that:

- Informs of the foreseeable time needed to examine its admissibility and how the reporter will be informed of the follow-up to his/her report;
- Details the process to be followed in the event of suspicion of terrorist acts and/ or money laundering;
- Requests, where appropriate, more information to clarify and assess the alert.

10.3. The management of the alert is carried out either at the project, coordination office or EOC-DICAC headquarter level according to the assessment of the alert. This evaluation is carried out by the team under audit and inspection department at EOC-DICAC headquarters upon receipt of the alert on telephone, fax, email or any possible means.

10.4. EOC-DICAC staff and other entities referred to in Article 1 of this policy shall:

- Cooperate with any investigation conducted by EOC-DICAC;
- Keep records of any alleged involvement in the case that it may be required for an investigation;
- Maintain the confidentiality of all allegations.

10.5. EOC-DICAC records the details of each proven case of terrorist offence and money laundering and the actions taken in a register of terrorist acts and money laundering.

10.6. The Audit and Inspection Department reports the proven cases and the measures proposed to the members of the Commission as part of the Quarterly as part of Audit and Inspection report. The commissioner of EOC-DICAC reports to EOC-DICAC Board of Directors.

11-Investigation Authority

The Audit and inspection department is responsible for the independent oversight of EOC-DICAC'S anti-terrorism and anti-money laundering policy and is responsible for its implementation and for promoting transparency within the organisation. In particular, the Audit and inspection Department is responsible for managing all issues linked to terrorism and money laundering within EOC-DICAC

12-Specific audits of situations relating to terrorism and money laundering

12.1. Audits on specific frauds and financial irregularities related to terrorism and money laundering are intended to verify the existence and extent of suspected fraud and financial irregularities. These investigations may be carried out at the request of the Audit and inspection department head or any other member of EOC-DICAC top management.

12.2. These investigations can be conducted either at project, coordination office or EOC-DICAC'S head quarter office, depending on the evaluation of the alert by the team at



audit and inspection department at EOC-DICAC'S headquarter.

- 12.3. The investigation team, led by the Audit and inspection department or by any other member of the top management of EOC-DICAC, shall exercise the utmost discretion when carrying out an audit on fraud or financial irregularity.
- 12.4. All inquiries will be communicated in writing to the team in audit and inspection at EOC-DICAC headquarters

E. S ACTIONS MECHANISMS

13-Measures following investigation

If the investigation conducted internally by EOC-DICAC demonstrates the existence of a proven offence related to terrorism or money laundering, the Audit and Inspection Department shall inform the commissioner the head of the concerned Departments and propose appropriate measures to be implemented, such as the sanction of the staff concerned in accordance with EOC-DICAC'S internal general HR development policy, the suspension or termination of the contract(s) concluded with any other bodies referred to in no. 2 of part II of this policy and the filing of a complaint with the competent police services

IMPLEMENTATION OF THE POLICY

14-Implementation date of the policy

This anti-terrorism and anti-money laundering policy comes into effect after approval by the Board of EOTC-DICAC on November 19-2020.

15-Adherence to the policy

EOC-DICAC staff and the other entities referred to in no. 2 of part II of this policy certify that they adhere to these principles by signing the EOC-DICAC Policy Acceptance form and/or by signing their employment contract

