

<b>Title:</b>	<b>Financial Sanctions, Anti Terrorism and anti money laundering policy</b>
<b>Policy statement:</b>	<p>Integra Foundation is committed to ensuring its resources are used solely to further its charitable aims and objectives.</p> <p>Therefore, Integra Foundation will take all reasonable steps to ensure that:</p> <ul style="list-style-type: none"> <li>● None of its funds or property are made available to parties that are subject to financial sanctions or are otherwise proscribed by the United Nations or World Bank, or by the governments of the United Kingdom, European Union, or United States.</li> <li>● None of its funds or property are used for purposes of terrorism</li> <li>● It is not connected with money laundering</li> </ul> <p>To this end, Integra Foundation will:</p> <ul style="list-style-type: none"> <li>● Perform procedures to be confident regarding the sources of its funds</li> <li>● Carry out processes to select and screen recipients of funds:</li> <li>● Ensure relevant staff and partners are trained and supported, to be aware of risks and to comply with the policy and procedures.</li> <li>● Report any suspected breaches of legislation and sanctions using the [Organisation's name] report procedures</li> <li>● Verify that relevant procedures are being followed</li> </ul> <p><b>All staff, consultants and volunteers</b> shall immediately report any belief or suspicion that Integra Foundation funds or property have been used by any sanctioned or proscribed party, or by any party for the purposes of terrorism. Reports should normally be made to the individual's line manager, but may also be reported using Integra Foundation whistleblowing procedure. The report will then be assessed and responded to, including notifications to all relevant authorities and donors</p>
<b>Definitions:</b>	<p><b>Financial sanctions:</b> Financial sanctions are imposed by the United Nations, European Union, United Kingdom, United States, and other countries. They take different forms including:</p> <ul style="list-style-type: none"> <li>● asset freezes which restrict access to funds and economic resources</li> <li>● restrictions on various financial markets and activities in certain countries</li> <li>● directions to cease business of a specified type</li> <li>● directions to cease all business with certain sanctioned individuals or organisations.</li> </ul> <p><b>Money Laundering:</b> is the process of making illegally-gained proceeds (i.e., "dirty money") appear legal (i.e., "clean").</p> <p>Charities can be targets for money laundering, if criminals believe they can put money into the charity and get it back out again. This could be through refunds, loan repayments, or payments to an organisation or people the criminal controls.</p> <p><b>Terrorism:</b> an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the</p>

	government or an international governmental organisation, or to intimidate the public and is made for the purpose of advancing a political, religious, racial or ideological cause.
<b>Related Policies &amp; Procedures:</b>	<ul style="list-style-type: none"> <li>- Code of conduct</li> <li>- Anti-corruption Policy</li> <li>- Financial control policy</li> <li>- Feedback and whistleblowing policy</li> </ul>
<b>Why is the policy needed:</b>	Legal, regulatory and donor requirements
<b>Who must follow this policy:</b>	<p>This policy applies to all staff and associates.</p> <p>Staff includes:</p> <ul style="list-style-type: none"> <li>● all staff, national and international</li> <li>● all volunteers and interns</li> </ul> <p>Associates includes:</p> <ul style="list-style-type: none"> <li>● all contractors, e.g., consultants</li> <li>● all Board Members</li> <li>● all partners including local community based partners</li> <li>● Guests and Visitors</li> <li>● Local partners</li> </ul>
<b>Person responsible:</b>	Ivana Corbova
<b>Version:</b>	Final version nm. 1
<b>Approved by:</b>	Allan Bussard
<b>Approval date:</b>	16th of March 2022
<b>Next formal review:</b>	Next review and approval date within 3 years of the above date or sooner if legislation, best practice or other circumstances indicate that it is necessary