



Counter-Terrorism, Anti-Money-Laundering and Sanctions Policy

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<i>Approving By:</i>	<i>Jonathan Andrew Greenwood</i>
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Counter-Terrorism, Anti-Money-Laundering and Sanctions Policy

Group Hug, as a Social Enterprise, although not a charity has the intention to comply with charity law. This includes ensuring that its assets are safeguarded and properly used to meet its Social Enterprise objectives. We also have a duty to protect any donations or public funds we may receive in the future. Our resources must not be used to support criminal or terrorist purposes or in any way that breaches applicable sanctions.

This policy applies to all Group Hug operations worldwide unless local legal requirements are more rigorous, or if applying the policy would be illegal under local laws.

We will assess the risks of becoming involved with terrorism and money laundering and of breaching applicable sanctions. We will put in place proportionate measures to manage those risks, while continuing to work in difficult and challenging places.

1. What is money laundering and terrorist financing?

Broadly, money laundering is the process of concealing the illegal origin of proceeds derived from crime. Terrorist financing is the provision, collection or receipt of funds intending or knowing that those funds will be used to support or carry out an act of terrorism. In the case of money laundering, the funds always come from one or more illegal sources or activities, whereas in the case of terrorist financing, funds can come from both legal and illegal sources.

2. Group Hugs commitment

Group Hug is committed to:

- having systems, procedures and controls in place to ensure it manages the risk of becoming involved in financing or supporting terrorist activity, money laundering, or breaching sanctions
- checking that those the Group Hug funds works with, for the highest risk transactions, are not on any lists of proscribed terrorist groups or persons, financial sanctions lists or other regulatory compliance lists, and assessing the risks if they are



GROUP HUG

- training its staff so they have an awareness of the risks related to terrorist activity, money laundering, and breaching sanctions
- ensuring that its staff understand their obligations to report any actual or suspected terrorist activity or money laundering
- meeting its obligations to report to external authorities

3. Working with external partners

We require all those receiving Group Hug funds to act in accordance with this policy to ensure our funds and assets are not used to finance or support terrorist activity or to launder money.

We will provide adequate and appropriate resources to implement this policy and will ensure it is communicated and understood.

Group Hug will review this global policy statement annually to reflect new legal and regulatory developments and ensure good practice.

4. Group Hug Pre-volunteering Screening

Pre-Volunteering screening comprises the procedures involved in deciding an individual's suitability to hold a volunteering status and a given role. This is not limited to 'new joiners', but also individuals who are moving between volunteering roles within an organisation.

Robust Pre-Volunteering screening policies and procedures are essential in Group Hug meeting their legal obligations and setting a foundation for a safe and secure workplace.

Appropriate screening measures help to provide cost effective and legally compliant assurance that only the right people, in the right volunteering roles, are working within Group Hug.

The application of screening measures will be consistent across all volunteering roles and consists of reference checking and a Disclosure and Barring Check (DBS)

As part of an overarching protective security strategy, the appropriate application of Pre-Volunteering screening will:

- deter applicants who may wish to harm Group Hug from applying for Volunteering
- detect individuals with an intent to harm Group Hug at the recruitment/application phase of Volunteering
- deny Volunteering opportunities to individuals intending to harm Group Hug and deny Volunteering opportunities in roles for which the applicant is unsuitable
- encourage the use of our whistleblowing policy and procedure for any and all volunteers should they have any concerns.



5. Implementation of Policy

This Policy shall be deemed effective as of 16th May 2021. No part of this Policy shall have retroactive effect and shall thus apply only to matters occurring on or after this date.