

Counter-Terrorism and Anti-Money Laundering Policy



Document Control	
Approved by:	MannionDaniels' Directors
Responsible Owner:	Director, Head of Operations
Created:	22 November 2018
Revised:	24 September 2021
Approved:	25 September 2021
Next Review:	24 September 2022
Version:	3

Introduction

MannionDaniels works for a more healthy, equitable, inclusive, safe and sustainable world. Much of our work focuses on reaching poor and vulnerable people often living in fragile and conflict-affected states. Terrorists and known terror organisations operate in the areas where we carry out projects.

MannionDaniels recognises that it faces increased risks of misappropriation of funds and resources that could support terrorist activities in areas where we work. We take seriously our obligations to ensure that monies and funds received from all clients and donors must not be misappropriated or utilised to support criminal or terrorist purposes or in any way that breaches applicable sanctions.

This policy applies to all MannionDaniels operations worldwide unless local legal requirements are more rigorous. 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.

MannionDaniels is committed to ensuring that:

- Systems, procedures and controls are in place to manage the risk of becoming involved in financing or supporting terrorist activity, money laundering, or breaching sanctions
- Robust and real time intelligence on terrorism risks is available for the countries that we operate in
- External guidance and support is available to ensure that key company and project specific risks (where required) are identified and assessed
- Financial and integrity due diligence checks are conducted on any potential partners, and key persons within such organisations
- Money is not released by MannionDaniels unless staff, consultants, contractors, suppliers complete and provide documentation confirming legitimate identities/business registration

- Checks are conducted on staff and other resources (consultants, contractors, suppliers, etc.) to confirm that those who partner and work with or who receive funds from MannionDaniels are not on any lists of proscribed terrorist groups or persons, financial sanctions lists, or other regulatory compliance lists and risks are assessed if they are
- MannionDaniels does not sub-contract on a project or activity where there are any risks that the project lead or other partners could have links to terrorism or terrorist activities
- MannionDaniels does not partner with any organisation (s) on projects where there are risks that partner organisation (s) could have links to terrorism or terrorist activities
- Training is provided to staff and other resources so that they have an awareness of the risks related to terrorist activity, money laundering, and breaching sanctions
- Staff are made aware of their obligations to report any actual or suspected terrorist activity or money laundering
- It meets its obligations to report to external authorities.

MannionDaniels requires all those working with or receiving funding from the company to act in accordance with this policy to ensure that 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.

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

Picture credits

Cove left: Team Kenya
Cover right: Send a Cow