



ANTI-TERRORISM POLICY

Policy number:	A-01	Version:	0001
Drafted by:	Tony Langer	Approved by Board on:	22/09/2014
Responsible person:	Tony Langer	Scheduled review date	01/10/2018

INTRODUCTION

Imprint Solutions Ltd renounces all forms of terrorism and will never knowingly support, tolerate or encourage terrorism or the activities of those who embrace terrorism and will make every effort to ensure that its resources are not used to facilitate terrorist activity.

This policy sets out Imprint Solutions Ltd response to the risk of dealing with individuals and organisations associated with terrorism and Australia Government legislation associated with this.

Relevant legislation can be found in:


- Part 5.3 of the Criminal Code Act 1995 ('the Criminal Code'); and
- Part 4 of the Charter of United Nations Act 1945 ('the UN Charter Act')

Failure to comply with Government requirements could significant impact the reputation of Imprint Solutions Ltd as well as expose the organisation to potential penalties.

POLICY

1. Imprint Solutions Ltd acknowledges that Australian Government legislation prohibits dealing with listed terrorist organizations and/or proscribed persons or entities. Imprint Solutions Ltd will at all times adopt measures intended to facilitate compliance with this legislation.
2. Imprint Solutions Ltd will confirm the identity, credentials and good standing of the people or organisations it supports and will check that these people or organisations are not on the lists maintained by the Australian Government.
3. Imprint Solutions Ltd will not knowingly remit any funds to known or suspected terrorist organisations or individuals.
4. Imprint Solutions Ltd will report any known or suspected terrorist links to the relevant national authority.
5. Imprint Solutions Ltd will use its best endeavours to ensure that overseas recipients of Imprint Solutions Ltd funds will adopt policies and procedures that enable them to comply with relevant Australian anti-terrorist legislation.

Authorisation


22/09/2014

ANTI-TERRORISM PROCEDURES

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RESPONSIBILITIES

The Imprint Solutions Ltd Board is committed to compliance with Australian anti-terrorist legislation to avoid dealing with individuals and organisations associated with terrorism.

The Executive Director will be responsible for ensuring that employees of Imprint Solutions Ltd carry out the following procedures at least annually to minimise the risk of dealing with terrorist organisations.

PROCESSES

1. Imprint Solutions Ltd staff members must know the identity, credentials and good standing of their partners and recipient organisations (i.e. what they do, where they operate, who are their key decision makers and staff).
2. Care will be taken to only transmit funds from Imprint Solutions Ltd using reputable banks and other financial institutions for this purpose.
3. To the extent possible, all Imprint Solutions Ltd and project partners will be made aware of Imprint Solutions Ltd obligations under Australian law and undertake to adopt similar measures in respect of funds from Australian sources.

Imprint Solutions Ltd will immediately withdraw all support, including provision of resources, if it has reason to believe that a project partner has breached the requirements of this policy.

4. As far as practicable, any funding agreement will include wording that requires the recipient organisation to adopt policies and procedures consistent with Australian Government requirements.

“The Organisation acknowledges that the Australian Government has adopted a policy and laws consistent with relevant international counter-terrorism Treaties and UN Security Council Resolution 1373 (2001) of not providing direct or indirect support or resources to organisations and individuals associated with terrorism.

The Organisation must use its best endeavours to ensure that funding provided under this Agreement is expended in a manner consistent with the UN Security Council Resolution and related Australian laws. If, during the course of this Agreement, the Organisation discovers any link whatsoever with any organisation or individual associated with terrorism it must inform the Australian Federal Police and/or AusAID immediately.”

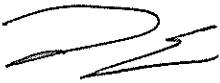
Source: "Guidelines for Strengthening Counter-Terrorism Measures In the Australian Aid Program" (AusAID, September 2004) DFAT.

5. Funding recipients will be required to provide detailed accounting report(s) showing how funds have been spent, at least annually. The accounting report(s) should be subject to review or audit by a member of the local public accounting peak body, e.g. Chartered Accountants or Certified Public Accountants. The review should confirm truth and accuracy of the accounting report.
6. Prior to funding any organisation, details of funded entities and their office bearers will be compared to Australian Government lists of terrorists and proscribed organisations. Where recipient organisations or individuals are found to be on either list, forwarding funds will cease and the national security hotline on 1800 123 400 will be informed immediately.

Related Documents

1. *Guidelines for Strengthening Counter-Terrorism Measures in the Australian Aid Program*

AUTHORISATION



Tony Langer

22/09/2014