

Anti-Terrorism and Money Laundering Policy

Policy Statement

Läkarmissionen (LM), operating globally under the LM International brand, 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. Therefore, LM is firmly committed against the financing of terrorism directly or indirectly to respect its contracts with donors by putting in place procedures for compliance with these contracts consistent with numerous Counter-Terrorism Committee framework United Nations Security Council resolutions, including S/RES/1373 (2001) and its connected council resolutions.

Purpose and Scope

It is the policy of LM to seek to ensure that none of its funds are used to provide support to individuals or entities associated with terrorism or used for criminal acts thereby preventing funds to reach the intended projects, programs and beneficiaries. This will also ensure that the most vulnerable will not suffer, and funds from LM are not being used as a vehicle for money laundering. This policy shall also guide LM on ensuring that the fund coming to the organisation is not sourced from terrorism.

LM recognises the regulations by which various countries abide to relevant legislation related to counterterrorism. This means that LM may adapt this policy in a country of operation if there is a need to do so to avoid breach of sanctions.

This policy applies to all LM governance members, all LM representatives, partners or other associated persons or entity.

Responsibility

The board will receive reports on this matter and any investigation that has been carried out.

The management group at the global office, regional office and country office together with the global management team will ensure implementation and monitoring of this policy and provide relevant training as and when required.

All representative, partners and associated persons or entity of LM have a duty to report any act of terrorism.

Definition

A terrorist act is an act, or a threat to act, that meets both these criteria:

- Terrorism intends to coerce or influence the public or any government by intimidation to advance a political, religious or ideological cause.
- Terrorism causes one or more of the following: death; serious harm or danger to a person; serious damage to property; a serious risk to the health or safety of the public; and serious interference with, disruption to, or destruction of critical infrastructure such as a telecommunications or electricity network.

Advocating, protesting, dissenting or taking industrial action are not terrorist acts where the person doing the activity does not intend to cause serious harm to a person or create a serious risk to public safety.

“Designated terrorist group” – means any group or entity formally listed or designated as “terrorist” by the United Nations, a Relevant State, or the European Union.

“Sanctioned” individual or entity means an individual or entity subject to financial sanctions by the international community (UN), the European Union or Relevant State or any entity beneficially owned (>50%) by an individual or entity subject to such sanctions.

A “High Risk” country is a country where known “designated terrorist groups” operate.

Money laundering is the process by which the proceeds of crime are channelled through financial systems to disguise their illegal origin and returned to the launderer in an indirect manner.

Principles and approach

LM’s procedures have a strong emphasis on “deter, detect, prevent, and respond”. To minimise the risk of fund diversion, and in particular terrorism financing, LM employs the following approach:

1. Conducts regular risk analysis concerning anti-terrorism activities. The risk analysis typically includes a review of the relevant legal requirements of donor governments, transit governments (e.g., territories through which goods or services are transferred), and host state governments, as well as donor policies and industry standards (if any) from other sectors. It also includes security analyses, including stakeholder analyses (armed groups, state and non-state actors), to determine the risk of terrorism targeting or undermining our operations.
2. Enforces a strict Code of Conduct among its staff and staff of partner organisations with a strong reference point to anti-terrorism and a statement on financial transactions with armed groups.
3. Maintains comprehensive financial records which account for all expenditure and publishes annual financial statements with detailed breakdown of incomes and expenditures.
4. Conducts annual external audit of all expenses as well as external audits of specific projects.
5. Reserves the right to carry out Third Party reference checks on individuals with whom LM has or plans to have a contractual link to ensure these individuals are not associated with terrorism and do not appear on counter-terrorism lists through the use of an industry-standard auto-screening software
6. Ensure training of its staff and partners on anti-terrorism policies, procedures and practices.
7. Conducts an in-depth due diligence of partners and sub-grantees, including Third Party Reference
8. Check to ensure the partner/sub-grantee does not appear on counter-terrorism lists, designated terrorist group and “sanctioned” individual or entity.
9. Applies a “know your supplier” principle for procurements for all national, international and restricted tenders.
10. In “high risk” countries screening will take place prior to payment or engagement in funding bids or other joint activities. The management group in “high risk” countries will also be subject to screening.

11. Ensure transparency in financial flows within LM to meet expectations of banking partners in particular in high-risk countries.
12. Guidance will be provided for staff on operational standards to avoid LM inadvertently becoming involved in money laundering activities.

Further reading

Anti-corruption policy, Anti-fraud and Bribery policy, Conflict of Interest policy, Code of Conduct, Global Security policy, Complaints policy, Whistleblowing Policy, Policy for purchasing and procurement, Regulations for the Board, the Advisory Board and the Management, Child Safeguarding policy, PSEAH policy, Gender Equality policy, Accountability Framework, Administrative Handbook