



Anti-Money Laundering and Counter Terrorism Policy

1. Purpose and Scope

The purpose of this policy is to express CFC ANCOP Australia Ltd. ("ANCOP") commitment to avoiding involvement in terrorist activities, avoiding supporting terrorism and individuals and organisations that support terrorism, money laundering and any other criminal use of funds and resources. This policy also articulates ANCOP's commitment to complying with relevant and Australian and partner country legislation for the prevention of terrorism and any related activities.

2. Scope

This policy applies to all ANCOP Board members, management committee, volunteers, contractors, and partner organisations.

3. Policy Statement

ANCOP is committed to using its best endeavours to ensure all expenditure of funds and the implementation of program activities, including those carried out by any partner organisations in countries in which ANCOP operates comply with all laws and regulations relevant for the prevention and control of terrorism.

ANCOP will work in conjunction with Australian and overseas governments to ensure its programs are not supporting terrorist activities.

4. Definitions

For the purposes of this policy:

Counter terrorism is the practice, techniques, and strategy used to combat or prevent terrorism.

Funds assets of any kind or property of any kind, whether tangible or intangible, movable or immovable, however acquired, and legal documents or instruments in any form, including electronic or digital, evidencing title to or interest in, such property or asset, including, but not limited to, bank credits, traveller's cheques, bank cheques, money orders, shares, securities, bonds, debt instruments, draft and letters of credit.

Listed individuals or organisations any individual or organisation which appears on either of the following lists:

'The Consolidated List' of all persons and entities subject to targeted financial sanctions under United Nations Security Council decision and maintained by the Department of Foreign Affairs and Trade pursuant to Regulation 40 of the *Charter of the United Nations (Dealing with Assets) Regulations 2008*.

'List of Terrorist Organisations' Organisations which have been prescribed by the Australian government as terrorist organisations under the Criminal Code because they advocate the doing of terrorist act (regardless of whether or not a terrorist act occurs), or because they are directly or indirectly engaged in, preparing, planning, assisting in or fostering the doing of a terrorist act (regardless of whether or not a terrorist act occurs).

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Money laundering is the process of moving money or property through the economy in a way that hides its illegal origins or intended criminal purpose.

4. Responsibilities

ANCOP Board, management committee, volunteers, contractors and partners are responsible for ensuring that they are familiar with and comply with anti-money laundering and counter terrorism policy procedures.

The ANCOP Board will have overall responsibility for the conduct and monitoring of this policy.

The ANCOP President is responsible for the implementation of this policy and for advising the Board on any relevant issues and the need to review or revise this policy as and when the need arises.

Where issues related to compliance to this policy are identified, the President will work with management committee and other relevant stakeholders to address these issues promptly. The policy will be reviewed every three years and revised as needed, with the approval of the Board.

6. Related Documents

CFC ANCOP Code of Conduct
CFC ANCOP Conflict of Interest
CFC ANCOP Financial Risk Management Policy
CFC ANCOP Fraud Control and Anti-Corruption Policy

7. Revision History

Version	Approval Date	Summary of Changes
V1.0	December 2024	Original policy

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Attachment 1 Procedures

1. Risk assessment

- **Conduct Regular Risk Assessments:** Identify and evaluate potential risks of money laundering and terrorism financing within ANCOP.
- **Update Assessments:** Regularly update risk assessments to reflect any changes in ANCOP's operations or external environment.

2. Internal controls and procedures

- **Internal Controls:** Establish internal controls to monitor and verify financial transactions, including segregation of duties and regular audits.
- **Due Diligence:** Implement due diligence procedures for accepting donations, especially large sums, to ensure they are not linked to illicit activities. ANCOP will also conduct due diligence of a potential partner and will take measures to know its beneficiaries and regularly check that beneficiaries and partner organisations are not listed individuals or organisations.
- **Reporting Procedures:** Develop clear reporting procedures for suspicious activities and ensure all staff are aware of these procedures.

3. Training and awareness

- **Regular Training:** Provide regular training for volunteers on the risks of money laundering and terrorism financing, as well as the ANCOP's policies and procedures.
- **Awareness Programs:** Conduct awareness programs to educate management committee, volunteers and partner organisations about the importance of policy compliance and how to identify potential risks.

4. Transparency and reporting

- **Transparent Financial Operations:** Maintain detailed records of all financial transactions and regularly report to relevant authorities.
- **Annual Reports:** File annual financial reports and comply with any regulatory requirements.

ANCOP will conduct financial transactions where possible through regulated financial institutions, such as banks or building societies.

ANCOP will conduct background checks of its members of management committee and volunteers.

5. Collaboration and information sharing

- **Collaborate with Other Not-for-Profit's:** Work with other not-for-profit organisations, regulatory bodies, and law enforcement agencies to share information and best practices for preventing money laundering and terrorism financing.
- **Information Sharing:** Share information on potential risks and suspicious activities with relevant authorities.

6. Monitoring and review

- **Continuous Monitoring:** Continuously monitor the effectiveness of the organisation's anti-money laundering and counter terrorism measures and update relevant policies and procedures as needed.
- **Regular Audits:** Conduct regular audits to ensure compliance with this policy and identify areas for improvement.

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7. Breach of this Policy

A breach of this policy may lead to disciplinary action. Individuals found to have committed an offence under any relevant legislation may also be subject to penalties as prescribed by the legislation, which can include criminal charges.

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