



# Green The Environment (GTE)

## Green The Environment Anti-Terrorism Policy



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# Green The Environment (GTE) Anti-Terrorism Policy

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**Approved by:** Executive Management

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**Created by:** Legal & Compliance

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**Binding on:**

- Executive Management, Board of Directors, and all employees of Green The Environment
- All Partner Organizations
- All social businesses
- All freelancers working for Green The Environment
- All persons and groups volunteering for Green The Environment
- All suppliers and service providers of Green The Environment

## 1. Background

Green The Environment (GTE) operates as a global non-governmental organization (NGO) with a mission to deliver sustainable environmental and humanitarian projects worldwide. As such, GTE acknowledges the risks associated with the diversion of aid, funds, or resources to terrorist activities, either intentionally or unintentionally, by staff, contractors, financial service providers, or partner organizations.

Terrorist groups may target sectors like ours that provide essential resources, humanitarian aid, and development assistance in high-risk areas. This policy outlines GTE's commitment to ensuring that none of its funds, nor those of its donors, are misused to support terrorism or related activities. GTE is fully committed to complying with international counter-terrorism laws, national security regulations, and ensuring that its operations are not exploited by terrorist groups.

## 2. Policy Statement

Green The Environment unequivocally renounces all forms of terrorism and will never knowingly support, facilitate, or encourage terrorism in any capacity. GTE is committed to upholding international obligations related to the financing of terrorism, particularly those outlined by the United Nations Security Council Resolutions (S/RES/1269, S/RES/1368, and S/RES/1373).

This policy ensures that none of GTE's funds, assets, or resources will be knowingly used, either directly or indirectly, to support terrorism, terrorist groups, or any individual or entity linked to terrorist activities. GTE takes all necessary steps to prevent its operations, funds, and resources from being misused in the financing of terrorism.

## 3. Scope

This policy applies to all individuals and organizations involved with Green The Environment, including but not limited to:

- **Board Members**
- **Executive Management and Staff**
- **Consultants, Contractors, and Freelancers**
- **Partner Organizations and Sub-grantees**
- **Suppliers and Service Providers**
- **Volunteers and Third-Party Service Providers**

All parties involved in the implementation of GTE's projects, financial operations, and resource management must adhere to the provisions outlined in this policy.

## 4. Legal and Regulatory Authority

- **International and National Counter-Terrorism Laws:** GTE complies with relevant national and international counter-terrorism legislation, including the obligations set forth by donor governments and applicable regulations.
- **GTE's Internal Rules and Standards:** This policy is part of GTE's broader compliance framework, including financial controls, risk management systems, and ethical standards.

## 5. Procedures for Counter-Terrorism Efforts

GTE's counter-terrorism approach focuses on the following principles: **Deter, Detect, Prevent, and Respond.**

### 5.1 Deter: Preventing the Risk of Terrorism Financing

1. **Risk Assessment:** GTE will regularly perform comprehensive risk analyses for all regions of operation to identify potential vulnerabilities and threats of terrorism financing. This includes evaluating local and international political contexts, risks related to armed groups, and financial risks tied to aid diversion.
2. **Strict Code of Conduct:** GTE enforces a zero-tolerance policy for any financial transactions with individuals or organizations linked to terrorism. All staff, partners, and contractors are bound by GTE's Code of Conduct, which includes clear guidance on anti-terrorism compliance and the prohibition of involvement with terrorist groups.
3. **Financial Record-Keeping:** GTE maintains rigorous financial records, ensuring transparency and accountability in all transactions. GTE's financial systems are designed to track and trace all expenditures, ensuring funds are used appropriately and not diverted.
4. **Third-Party Due Diligence:** GTE conducts thorough due diligence on all partners, contractors, suppliers, and sub-grantees, including background checks, to ensure they are not linked to terrorism. We use industry-standard software for screening against sanctions lists and other databases that track terrorist organizations and individuals.

### 5.2 Detect: Identifying Potential Terrorism Financing

1. **Automated Screening and Monitoring:** GTE uses automated screening software to detect any affiliations with individuals, groups, or organizations associated with terrorism. These systems are used during the hiring process, when selecting partners, and when reviewing financial transactions.
2. **Routine Audits:** GTE performs regular internal and external audits of financial records and operational expenditures to detect any signs of fund diversion, corruption, or terrorism financing.
3. **Incident Reporting Mechanism:** GTE provides clear and accessible channels for employees, contractors, and external parties to report any concerns or suspicions related to the misuse of funds or connections to terrorism. These reports can be made anonymously if preferred.

## 5.3 Prevent: Proactively Safeguarding Against Terrorism Financing

1. **Training and Awareness:** All staff, volunteers, and partners will receive periodic training on recognizing and preventing terrorism financing. This training will include guidelines on how to report suspicious activities and the legal implications of terrorism financing.
2. **Due Diligence on Suppliers and Partners:** GTE applies a “Know Your Supplier” (KYS) approach to procurement and contracts. Each supplier and partner is thoroughly vetted before any financial or operational agreement is made, ensuring that they do not appear on relevant sanctions or terrorist lists.
3. **Operational Risk Mitigation:** GTE implements operational procedures and checks to prevent diversion of funds or resources. This includes checks on cash disbursements, vendor invoices, and project expenses to ensure that funds are being used as intended.

## 5.4 Respond: Addressing and Rectifying Any Violations

1. **Investigation of Violations:** If there is any suspicion or evidence of a violation of this policy, an immediate investigation will be conducted by GTE’s Compliance and Internal Audit departments.
2. **Disciplinary Action:** Any employee, contractor, or partner found violating this policy will face disciplinary measures, up to and including termination of employment or contract. In severe cases, legal actions may be taken.
3. **Reporting to Authorities:** GTE will report any confirmed violations or suspected criminal activity related to terrorism financing to the appropriate national and international authorities, as required by law.

## 6. Responsibilities

- **Executive Management:** Ensures overall compliance with this policy and integrates counter-terrorism measures into GTE’s operations.
- **Compliance Department:** Oversees the implementation of this policy, conducts regular audits, and handles reports of potential violations.
- **Managers:** Ensure that staff and partners adhere to the policy and provide guidance on counter-terrorism compliance.
- **HR Department:** Conducts thorough background checks on all new hires and monitors adherence to the Code of Conduct.
- **Finance Department:** Maintains financial transparency and ensures proper tracking and accountability of funds.

- **Procurement Department:** Verifies that all suppliers and contractors comply with anti-terrorism screening and due diligence procedures.

## 7. Reporting and Violations

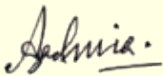
GTE encourages a culture of transparency and accountability. Any individual suspecting a violation of this policy is required to report the concern immediately through the **Whistleblower Reporting Portal**. GTE ensures that reports are confidential, and individuals will not face retaliation for reporting in good faith.

### **Consequences for Violations:**

Violations of this policy may lead to disciplinary action, including termination, as well as legal action if required. GTE reserves the right to terminate contracts, partnerships, and cooperation agreements if a breach of this policy is found.

## 8. Conclusion

Green The Environment is committed to the global fight against terrorism. We take all necessary measures to ensure that our operations and funds are not diverted to support terrorist activities. Through effective risk management, thorough due diligence, staff training, and strict financial controls, we work to safeguard the integrity of our work and maintain the trust of our stakeholders.



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