



## **Raise for Development and Humanitarian Aid (RDHA)**

### **Counter-Terrorism and Anti-Financing of Terrorism (CTF) Policy**

## **Firm Commitment to Integrity and Accountability**

The Counter-Terrorism and Anti-Financing of Terrorism (CTF) policy at RDHA is a fundamental pillar within our comprehensive framework of sound corporate governance, compliance, and social responsibility. We fully recognize the growing global challenges and inherent risks associated with terrorist financing and money laundering, and we reaffirm our absolute commitment to ensuring that all our humanitarian and development assistance, provided to the most vulnerable communities, is not used in any way—whether intentionally or unintentionally—to support any illegal, unethical activities or those that contradict our humanitarian principles.

This policy aims to safeguard RDHA's reputation, ensure the continuity of our operations, and strengthen the trust of our donors, partners, and beneficiaries, while strictly adhering to international standards and best practices in counter-terrorism efforts.

### **1. Legal Framework and Guiding Principles**

RDHA's CTF policy is based on a robust international and national legal framework and guided by the following principles:

- A. Absolute Legal Compliance:** We are fully committed to complying with all relevant local and international laws and regulations related to counter-terrorism and its financing. This includes, but is not limited to, United Nations Security Council Resolutions, counter-terrorism laws in the Republic of Sudan and the countries where we operate, and regulations issued by major donors (such as USAID, the European Union, and OFAC).
- B. Full Transparency and Enhanced Accountability:** We ensure the highest levels of transparency in all financial and operational transactions, with clear and auditable accountability mechanisms at all organizational levels.

**C. Enhanced Due Diligence:** We implement comprehensive and ongoing due diligence procedures for all counterparties, going beyond basic requirements to identify, assess, and mitigate potential risks.

**D. Effective Cooperation:** We commit to full and transparent cooperation with relevant authorities, regulatory bodies, and law enforcement agencies in counter-terrorism and anti-financing efforts, while maintaining beneficiary data privacy in line with humanitarian principles.

## **2. Comprehensive Systematic Vetting Procedures**

RDHA applies strict, multi-level systematic vetting procedures for all counterparties to ensure no links to terrorist activities or prohibited entities. These procedures include:

### **1. Screening Against Sanctions Lists:**

1. Systematic and ongoing verification of all partners (local and international organizations, government entities), suppliers, staff (pre-employment and during service), consultants, and, where practical and appropriate, beneficiaries (without hindering access to humanitarian aid) against internationally and nationally recognized terrorist and prohibited entity lists.
2. These lists include, but are not limited to:
  - a. UN Security Council Consolidated Sanctions List.
  - b. OFAC's Specially Designated Nationals and Blocked Persons List (SDN List).
  - c. EU Sanctions Lists.
  - d. Any other relevant sanctions or terrorist lists issued by governments or international bodies within their jurisdictions.
3. Reliable and up-to-date screening tools are used to ensure accuracy and comprehensiveness.

### **2. Pre-Screening and Due Diligence:**

- Rigorous and thorough checks are conducted for all contracting parties before entering into any agreements or transactions. This includes legal record reviews, reputational checks, and assessments of organizational and financial backgrounds.
- Focus is placed on understanding ownership and management structures to ensure no hidden links exist.

### 3. **Continuous Monitoring:**

- Vetting is not limited to initial screening but includes periodic and ongoing monitoring to ensure continued compliance throughout the contract or partnership duration.
- Key parties are re-screened regularly (e.g., annually or biannually) or when new relevant information arises.

### 4. **Comprehensive Documentation:**

- All screening and verification processes are meticulously documented, with full records of procedures, results, and decisions retained.
- These records are securely stored and auditable to meet donor and regulatory requirements.

## 3. **Training, Awareness, and Capacity Building**

Awareness and continuous training are critical to effectively implementing this policy. RDHA is committed to building staff capacity to serve as the first line of defense against terrorist financing risks:

- **Mandatory Training Programs:** All staff, especially those directly involved in procurement, partnerships, program management, and financial operations, receive regular training on:
  - ✚ The importance of the CTF policy and its impact on operations.
  - ✚ How to apply systematic vetting procedures and related internal controls.
  - ✚ Identifying red flags and suspicious activities that may indicate terrorist financing or money laundering.

✚ Effective reporting mechanisms for concerns or suspicions.

- **Clear Guidance Materials:** Easy-to-access guidance and educational resources are provided to ensure full understanding of the policy and procedures.
- **Compliance Culture:** A strong culture of compliance awareness and shared responsibility is fostered across the organization.

#### 4. Reporting and Investigating Suspicious Activities

RDHA has clear and effective mechanisms for reporting any activities or red flags that may indicate terrorist financing or money laundering:

- **Secure Reporting Channels:** Staff are encouraged to report suspicions to senior management, internal audit, or the compliance committee (if applicable) through secure and confidential channels.
- **Whistleblower Protection:** The organization ensures whistleblowers are protected from retaliation, in line with our whistleblower protection policies.
- **Immediate and Thorough Investigations:** All reports are treated with strict confidentiality and investigated promptly and comprehensively by relevant parties.
- **Reporting to Authorities:** If suspicions are confirmed, suspicious activities are reported to relevant authorities, law enforcement agencies, and concerned donors, in accordance with legal and contractual requirements.

#### 5. Continuous Review and Improvement

RDHA's CTF policy is reviewed periodically (at least annually or when significant changes occur in the operational environment, laws, or donor requirements) to ensure its continued effectiveness and relevance to evolving legal, regulatory, and threat landscapes. Procedures and controls are updated as needed to ensure we remain at the forefront of global counter-terrorism efforts.