

Anti-Terrorism and Anti-Money Laundering Policy

Version 1.0

1. Objective

AfroLeadership is determined to prevent its funds or partners' funds from being used directly or indirectly for terrorist activities and to prevent the proceeds of crime to be washed through AfroLeadership.

Funds that are diverted to terrorist organizations or used for criminal acts are funds that do not reach the intended projects, programs and beneficiaries and, therefore, the most vulnerable will suffer.

Further to this, suggestions that a civil society organization like AfroLeadership is linked to terrorism or money laundering in any way can be damaging to its reputation and undermine the trust and support of beneficiaries, partners, the wider public and donors.

The objective of this policy is to prevent AfroLeadership funding terrorism, breaching sanctions and being used as a vehicle for money laundering.

2. Scope

The policy also applies to all staff members and consultants of AfroLeadership headquarters in Yaounde, Cameroon, Regional offices in Africa and Country chapters. All implementing partners, donors and suppliers are subject to the measures to prevent financing terrorism and/or money laundering.

Whilst our activities take place in high risk locations for terrorism, AfroLeadership has been working for more than 10 years now with local partner organizations, public administrations and local governments, on topics and issues that are obviously very far from terrorists activities. However, it is very important to take measures and implement procedures that reduce the risk, and that protect AfroLeadership from inadvertent impact of any proven or alleged terrorist funding.

The prevention of funding terrorism and money laundering is legally laid down in Cameroon in various legal instruments.

3. Dissemination

The Anti-terrorism and anti-money laundering policy is openly available on AfroLeadership website. The policy (as well as all updates) is communicated as any other policy to new employee (onboarding process), contractors, partners, and various stakeholders.

The Anti-terrorism and anti-money laundering policy will be mentioned in all legal agreements with partner organizations, donors, consultants and suppliers including a link to the full document.

4. Related policies

The Anti-terrorism and anti-money laundering policy should be read in connection with other policies, procedures and tools in force at AfroLeadership.

5. 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.

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

6. Prevention

AfroLeadership has the following measures in place to reduce the risk of accidentally and deliberately funding of terrorism or being used for money laundering:

Due Diligence on partners and suppliers : AfroLeadership makes sure to work only with partners and suppliers that are reliable enough to reduce the risk of working with dangerous organizations or partners.

Code of Conduct : AfroLeadership enforces a Code of Conduct among its staff, regional representatives, and country chapters. Staff, regional representatives and country chapters coordinators sign up to the Code of Conduct on joining the organization. The Code of Conduct specifically mentions that everyone involved with AfroLeadership, should contribute to preventing unethical and criminal activities.

Internal Auditor : AfroLeadership has appointed an internal auditor who assists the President of AfroLeadership and AfroLeadership Board in fulfilling their responsibilities, by independently reviewing financial statements and the effectiveness of our internal controls. The internal auditor monitors the effectiveness of internal audit processes, and assists the President of AfroLeadership, in fulfilling its responsibilities for determining the nature and extent of the risks it is willing to take in achieving its strategic objectives

Procedures: AfroLeadership has administrative and financial procedures to support functions in the areas of finance, procurement, administration and asset management.

Segregation of duties: Responsibilities in key financial processes are separated among several employees rather than entrusted to one employee. Example, at AfroLeadership, financial operations, cheques and bank operations are always carried on by two signatories, to avoid unauthorized transactions.

Proper books and records: AfroLeadership maintains an accounting system that allows tracking of income and expenditure with unique referencing to projects, funding sources and external third parties in the system. All income and expenditure is linked to donor/source coding and all program expenditure is linked to specific projects and partner coding. In addition, AfroLeadership retains all supporting documentation (receipts, invoices and supporting documents) in line with legislative requirements. AfroLeadership uses a computerized accounting system.

Cash and Bank management: Controls include regular cash counts and monthly bank reconciliations, authorization levels to carry out financial operations, segregation of duties, signatures/system approvals. In addition, when used, cheques require two signatures, and all bank transfers require dual signatures.

7. Detection

Annual external audit : AfroLeadership undergoes an annual external audit of its financial statements.

Banking system: AfroLeadership has decided that all expenditures above 100 000 CFA (about 150 USD) must be paid only through bank transfer or cheques. This process allows to provide tracking information to authorities in case of money laundering or suspicious operations.

8. Responsibilities

The Board of Directors is the owner of this Anti-terrorism and anti-money laundering policy and approves the policy.

The President of AfroLeadership is responsible for keeping this procedure up to date and review the policy at least on an annual basis.

All staff will be informed through various means (billboard, printed version, websites, internal network, etc.) on updates of the policy.