

THE EAST AFRICAN FUND LIMITED

ACN 620 147 775

Policy on Safeguarding against Terrorism Financing

1. Purpose

The East African Fund Limited (“EAF”) is committed to taking all reasonable efforts to ensure that the funds it sends to The School of St Jude and any of its international partners (collectively called “International Partners”) are not being directed towards terrorist activities or are used in a fraudulent or corrupt manner.

2. Anti-terrorism financing Principles

- EAF will comply with all Australian laws, including laws relating to anti-terrorism financing or money laundering (*specifically Anti Terrorism Act 2001 (Cth), Criminal Code Act 1995 (Cth) and Charter of the United Nations Act 1945 (Cth)*).
- EAF will use its best endeavours to ensure that all expenditure of funds and implementation of program activities by International Partners will not breach any Australian laws, including laws relating to anti-terrorism financing or money laundering.
- EAF will require all International Partners to comply with the laws of the countries in which they are operating, including laws relating to anti-terrorism financing or money laundering.
- EAF will take all reasonable steps to understand the level of risk it may be exposed to in relation to terrorism financing or money laundering and, where risk is evident, ensure that appropriate precautions are in place.

3. Anti-terrorism financing Practices

- EAF shall undertake due diligence on each of its International Partners, including regular project visits by at least one of EAF’s Directors. Such due diligence will include meeting a representative of the Board (where practical) and the senior staff of the partner.
- EAF shall obtain a copy of the its International Partners’ written policies and practices in relation to the avoidance of terrorism financing and discuss those policies and practices with its International Partners during project visits.
- Each assessment and approval of an International Partner and each assessment and approval of a specific project shall involve an assessment of the risk of terrorism financing, including checking all relevant Australian Government lists of terrorist organisations and sanctioned individuals and organisations.

- All grant payments shall be made through regulated financial institutions to known beneficiaries and advice of payments shall be given to more than one person at the organisation.
- EAF shall maintain detailed records of all payments to International Partners.
- EAF shall monitor and evaluate the activities carried out by International Partners to ensure that grants are expended on the purpose for which they are given.
- Where the Board of EAF has assessed an International Partner at high risk of Terrorism Financing, extra precautions will be put in place by the Board.
- Any suspicious activity will be notified to the Directors of EAF immediately.

Contacts

For questions about this policy, contact the Board via email at info@eaf.org.au.

Version Control

Version	Board Approval	Description
1.0	28 January 2020	Initial policy to meet the External Conduct Standards