



1 Purpose

The Leprosy Mission is committed to the highest standards of legal and ethical behaviour to ensure alignment with our values and enable our mission to transform the lives of people living with leprosy.

With respect to donated funds TLMA also has specific obligations to donors which is lived out through a zero tolerance for all financial wrongdoing, including diversion of funds such as terrorism financing.

To maintain these standards and enhance the organisation's alignment to government regulations on counter terrorism, TLMA is committed to maintaining a culture and systems which will:

- ensure that all implementing partner organisations comply with relevant and applicable laws, regulations, and policies, both in Australia and in the Partner Country
- ensure that they do not provide support or resources to organisations and individuals associated with terrorism
- take necessary steps to reduce the risk of funds being misdirected to terrorist activity via a third party.

2 Scope

This policy applies to all staff and Board members of TLMA, and to temporary workers, volunteers, consultants, contractors, agents, and implementing partners. This Policy applies to TLMA's workplaces and projects globally. Every member of staff and associated persons acting for, or on behalf of, TLMA are responsible for maintaining the highest standards of business conduct.

3 Zero tolerance

The Leprosy Mission Australia (TLMA) has a zero-tolerance approach to terrorism financing of any type or in any circumstances, whether perpetrated by staff, board members, consultants, volunteers, or partners.

A zero-tolerance approach represents a set of principles and commitments that are applied by TLMA to prevent, detect, record and report any suspected activity that may put at risk government policies for living safely together.

4 Responsibilities and Accountabilities

4.1 The Board

The TLMA Board are responsible for:

- creating a culture of Zero Tolerance toward terrorism financing;
- providing governance guidance for TLMA in relation to financial wrongdoing;
- holding senior management accountable to this Policy.

4.2 Senior Management

Senior management are responsible for:

- ensuring this Policy is upheld, regularly updated and will inform the Board of any concerns relating to financial wrongdoing that may present risk to TLM, its personnel, beneficiaries, partners, reputation, operations or other activities;
- ensuring that appropriate risk assessment and mitigation controls are put in place and regularly reviewed;
- ensuring procedures, practices, plans and operations align with this Policy;
- ensuring that all entities and relevant personnel are trained in order to be aware of, and understand, this Policy and their responsibilities under it.

5 Prevention strategies

In line with obligations outlined by the ACNC and DFAT, screening is a fundamental procedure.

For outgoing funds, appropriate procedures must be in place so that there is no engagement with any sanctioned persons or organisations on the proscribed lists or any persons or organisations associated with a terrorist organisation. This will require:

- Utilisation of screening mechanisms eg World Bank, LinkMatchLite, on a regular basis
- Documentation of searches for
 - Partners, both immediate and downstream
 - Suppliers
 - individuals, and
- Relevant staff are trained in these procedures.

6 Reporting Obligations

Good practices will include **recording, reporting and investigating** to establish timely, comprehensive recording and reporting.

All confirmed matches from screening procedures must be immediately reported to DFAT.

7 Statement of commitments

The Leprosy Mission Australia (TLMA) is committed to:

- Highest standards of ethical conduct and integrity in its business activities in all countries where we operate.
- Implementing effective measures to prevent, monitor and eliminate terrorism financing.
- Promote a risk-aware culture in respect to terrorism financing.
- Use TLM's partner assessment and monitoring processes to verify that partner organisations in countries with heightened terrorism risk are legitimate and have a good standard of financial control and accountability
- Use only formal financial systems such as banks or approved companies to transfer funds to programmes or suppliers
- Use the established project monitoring processes, including regular financial reports, reports on project deliverables and periodic financial audits, to ensure funds are not being diverted for improper purposes
- Incorporate terrorism risk, including the identification of countries with heightened terrorism risk, in the annual risk assessment

8 Linked documents

- Human Resources (HR) Guidelines
- Safeguarding policy and practice

9 Policy Review

This Policy will be reviewed in 2 years.

Revision History

Version	Date	Author	Summary
4.0	05/07/2018	Nerida Collard	New draft created for next revision
4.1	23/02/2021	Andrew Newmarch	New version created with Guidance document
4.2	9/3/2021	Andrew Newmarch	Amendment made to clause 6 as per GRC review
4.3	16/3/2021	Andrew Newmarch	Amendment to 4.1 and section 8 as per IPC review

Document Approval History

Version	Date	Approved by
1.0	20 October 2008	TLMA Board
2.0	5 May 2014	TLMA Board
3.1	25 June 2018	TLMA Board
4.3	27 March 2021	TLMA Board