



Counter-Terrorism Policy
WeWorld-GVC Foundation

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1. INTRODUCTION AND PURPOSE

The WeWorld-GVC Foundation (hereinafter WeWorld in short), established in December 2018 from the union of WeWorld Onlus - founded in Milan in 1999 - and the GVC Association - set up in Bologna in 1975 - intends, with this document, to underline and reaffirm its commitment to the fight against terrorism.

WeWorld is active in 26 countries and recognizes that in the different contexts in which it operates, at a local level, there are different approaches and different regulations concerning the terrorist threat. This policy is therefore intended to ensure that, while taking into account these differences, including legislative differences at the local level, the Organization adopts a common framework in the fight against terrorism.

The WeWorld recognizes the existence of a possible risk of diversion - by staff, partners, third parties contracted to carry out the activities, etc. - of its institutional funds, in favour of activities directly or indirectly related to terrorism.

WeWorld has developed this policy to face any misuse or diversion of funds, ensuring that they are not used, directly or indirectly, to support terrorist activities, as well as to provide useful guidance on what to do in case one of these acts has been carried out.

At the same time, WeWorld believes that a structured governance, and the existence of solid administrative, accounting, partner management procedures etc... can stem and prevent the risks related to terrorism. The systems of internal control, prevention and fight against fraud and corruption and risk management and analysis in use at the Organization, therefore, support and integrate this policy in its application.

This policy states the WeWorld's commitment to prevent activities of humanitarian assistance and/or support for sustainable development from being unduly interfered with terrorist activities and/or phenomena or terrorist financing, with the ultimate aim of countering any phenomenon of misappropriation of funds or, in any case, the misappropriation of aid for the accomplishment of unlawful acts of the kind mentioned above.

This policy is also part of the 231/01 system adopted by WeWorld, in compliance with the Italian crime prevention legislation.

2. RECIPIENTS

This policy applies in all countries in which the WeWorld operates and is, thus, a global policy.

The policy is addressed to, without exception: Members of the Foundation (Promoters and Subscribers), the Foundation Bodies - Board of Promoters and the Board of Subscribers, Board of Directors, President, CEO, Board of Auditors -, all persons subject to their direction and supervision, all staff, employees, collaborators - regardless of their role and function. All subjects who, for different reasons, collaborate with WeWorld are also Recipients: consultants, suppliers, volunteers, partners, financing subjects, donors - and in general to all those who, with their contributions, support WeWorld's activity; the provisions contained herein apply therefore to any other subject who establishes, directly or indirectly, permanently or temporarily, relationships with the Organization.

The principles and provisions contained herein are binding for all Recipients, who must be inspired by them in carrying out their activities in favour of and within the Organization.

3. WEWORLD POSITION

WeWorld strongly condemns all forms of terrorism, and will not support, tolerate or encourage, through its institutional activities, any form and/or act of terrorism, or any activity related to terrorism, including its financing.

WeWorld implements in all countries in which it operates the anti-terrorism provisions in force at international, Italian, and European level, and also recalls the numerous Resolutions of the UN Security Council , as well as the Global Counter-Terrorism Strategy adopted by the United Nations, on the fight against terrorism and its financing.

Furthermore, WeWorld recognizes and adheres to the counter-terrorism provisions adopted by its own institutional donors.

This policy represents a commitment of the Organization in the fight against terrorism and it contributes to ensure that no funds are directly or indirectly allocated to support entities and/or individuals related to terrorism, or their possible financing. WeWorld is committed to strengthening its institutional action in this regard.

4. PREVENTION MECHANISMS AND FIGHT AGAINST TERRORISM

WeWorld adopts an approach based on preventing and combating terrorism, and, in order to minimize the risk of diversion of funds for terrorist financing, it applies the following measures:

- Dissemination and strengthening between staff and relevant stakeholders of the rules of conduct contained in its Code of Ethics and Conduct and Anti-Fraud and Anti-Corruption Policy, with particular regard to anti-money laundering and anti-fund diversion principles;
- Correct bookkeeping, proper tracking of all expenditures, disclosure of annual financial statements and financial reports;
- Periodic risk analyses regarding terrorism prevention measures, including security analyses that are also addressed to stakeholders in the field, in order to determine the concrete risk exposure for the Organization's operations;
- Carrying out periodic audits of balance sheets and at project-level;
- Adequate verification¹ of the identity of WeWorld's counterparts: partners, subgrantees and suppliers are periodically assessed to verify their identity and to ensure, among other things, that they are not involved in terrorist activities ;
- Training of staff and partners on the content of this policy, on the Organization's internal control mechanisms, also in relation to the role held.

5. RESPONSIBILITIES

STAFF DUTIES

Employees, collaborators, volunteers, and all personnel, have the duty to read and familiarize themselves with this policy, to participate in training activities proposed on the subject and to comply with current anti-terrorism regulations, as well as with the content of this document.

¹ Vetting checks aiming at verifying that the subject does not appear on the consolidated sanctions lists of different countries and governments

DUTIES OF DEPARTMENT AND UNIT MANAGERS, HEAD OF REGIONAL UNITS AND COUNTRY REPRESENTATIVES

They are responsible for ensuring that this policy and the duties arising from it are made known to its Recipients, and that staff and external stakeholders (partners, suppliers, ministries, etc.) comply with the provisions of this document and current legislation on the fight against terrorism.

They also have the duty to conduct periodic assessments on the risk of exposure to terrorist phenomena and, in their activities, to formulate appropriate mitigation responses and adequate follow-up. With regard to these activities, they must report and consult with the Quality, Legal & Compliance Unit.

Furthermore, and more in detail:

- In the **selection and recruitment of personnel**, the Managers are required, also in relation to the sensitivity of the position held and the country in which the collaboration is carried out, to acquire references on the person contracted, requesting, if necessary and considering the delicacy of the role, also his/her criminal record;
- At the level of **administrative and financial procedures**, among others: i) WeWorld ensures a tracking of all accounting records; each record is marked with an ID which is automatically and univocally attributed to each expense or movement when recorded in the accounting system, allowing each movement and/or expense to be uniquely associated with a specific project; ii) the system of internal controls and segregation of duties ensure continuous control over the use of funds, preventing them from being misused; iii) the system of reconciliations of cash registers and banks, as described in the AFC manual and SOPs and in the Local Operational Manuals, allows an accurate control and monitoring of expenses and financial movements affecting the Organization's operations; iv) the authorizations and verification's system that is required before proceeding with a payment, as detailed in the AFC manual, SOPs and the Local Operational Manuals, ensures that the payment can only be made against a valid title, and in the presence of the necessary supporting documentation (internal authorization documentation, issue of invoice, receipt, or delivery note by the supplier of the good or service); v) payments exceeding EUR 500, or equivalent value, are necessarily processed via bank, unless a waiver is necessary, which must be duly documented and previously authorised; vi) after making a payment, proof of release by the supplier is always required; vii) donations made to third parties must be supported and justified by valid supporting documentation and authorised by the head office, the same for any donations received from third parties.
- At the level of **purchasing procedures**, the Organization ensures the strict application of the procedures set out in the Manual of Purchasing Procedures. They ensure a choice among negotiating counterparties based on the principles of fairness, transparency and integrity, as well as on the compliance with high ethical standards in line with the best commercial practices. WeWorld acquires information about its suppliers, in compliance with the "know your supplier" principle and carries out checks to ensure that they do not appear on the

official blacklists². WeWorld also ensures internal control and monitoring of local stocks and assets in compliance with operating procedures and through local-HQ coordination.

- At the level of the **programs' department**, WeWorld, among other things, applies: i) *due diligence* procedures in the selection and evaluation of its partners for the joint implementation of project activities; ii) provides training, and in general capacity building programs, to project partners, which are, among other things, subject to constant monitoring; iii) by applying the principles of PCM, including evaluation and monitoring, ensures quality and accountability in the programs implemented; iv) ensures a selection of beneficiaries consistent with the assessments' results, which remain properly documented; vi) ensures a management of complaints and feedback coming from the beneficiaries of the communities involved³.

THE DUTIES OF THE QUALITY, LEGAL & COMPLIANCE UNIT (QLC)

It ensures that the risks linked to terrorist phenomena have been properly assessed and identified by the various Managers and the other subjects, referred to in the previous paragraph. It also ensures that the system of internal control and risk management is correctly implemented. It periodically informs the CEO about the activities that have been carried out. In case of alerts which may be relevant according to the legislative decree 231/01, they will be promptly addressed to the Supervisory Body.

THE DUTIES OF THE MANAGING DIRECTOR

The Managing Director chairs the internal control and risk management system and periodically informs the Board of Directors.

THE DUTIES OF THE BOARD OF DIRECTORS

It approves the content of this document and proposes and approves updates whenever deemed necessary. It oversees the application of this policy, respecting it in turn.

THE DUTIES OF THE PRESIDENT

He/she ensures, through collaboration with the Managing Director, that the system of internal controls to prevent terrorism is in line with current regulatory standards and is consistent with the strategic plan and risks' policy.

He/she plans, in agreement with the Board of Directors, the internal audit activities, aimed at monitoring, among other things, the implementation of this policy and the procedures referred to therein, as well as their compliance by its Recipients.

² Vetting Check aiming at verifying that the subject does not appear on the OFAC list - US Office of Foreign Asset Control; UN Sanction list, EU Proscribed list or on consolidated sanctions lists of different countries and governments

³ CFM – Complaints Feedback Mechanisms

6. REPORTING DUTY AND WHISTLEBLOWING

All the Recipients of this policy who, when carrying out their activities in the name and on behalf of the Organization, identify or are aware of activities that are related or attributable, directly or indirectly, to terrorist activities or terrorist associations, have the duty to report them through the channels set up by WeWorld.

The Organization guarantees confidentiality and protection from retaliation to anyone who, having become aware of, or who has the suspicion of, illegal behavior, decides to report it in good faith.

Reports of violations, even presumed ones, of this policy must be sent through the whistleblowing platform set up by WeWorld for this purpose and accessible at the following link <https://whistleblowersoftware.com/secure/WeWorld>. The platform guarantees confidentiality and allows the whistleblower to stay up-to-date on the status of the case by issuing a password when sending the report.

Alternatively, reports may be sent to the WeWorld internal address compliance@weworld.it managed by the QLC Unit, which will promptly inform the Supervisory Body in the case of relevant reports under the 231/01 Decree.

All reports that relate to sufficiently detailed facts and that do not prove to be manifestly unfounded or false will be further investigated. The reports will be taken over by the QLC Unit identified as the entity in charge of also managing the investigation process.



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