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GENERATION HUMANAIRE



**Anti-terrorism,  
money-laundering and other criminal  
activities policy**

# Sommaire

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<b>Introduction</b>	3
<b>Objective</b>	3
<b>Scope</b>	4
<b>TGH commitments</b>	4
<b>Implementation</b>	5
Staff	5
Suppliers and service providers	6
Partners	6
<b>Exclusions</b>	6
Screening of beneficiaries	6
Security	6
<b>Information</b>	7
Screened individuals or entities	7
Donors	7
TGH bodies	7

# Introduction

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TGH is determined that its funds and resources should only be used to support its mission and must not under any circumstances be used unlawfully by a third party, or used or misappropriated for unlawful purposes. TGH is therefore committed to detecting and protecting itself from risks associated with the funding of criminal activities, such as money laundering or terrorism, which has now become one of the most direct and global threats to peace, security and stability, as well as for respect for human rights and social and economic development.

The need not to contribute, even indirectly, to any unlawful activity whatsoever, has been integral to TGH's work since it was formed. This is now accompanied by more stringent demands from most of our donors, including formal requirements.

A key question TGH faces today is the compatibility between the issues of accountability and responsibility on the one hand, and the principles of intervention on the other, whether these are global humanitarian principles or those specifically defined by TGH and the approach it upholds. TGH is committed to developing relationships of trust with its staff and implementation partners, and does not wish to damage its culture of working closely with others through mistrust of the principle or practices of over-compliance. The organisation is anxious to remain a renowned and credible stakeholder for its financial partners, and must also guarantee that its actions and the use of the funds entrusted to it comply with the rules and requirements decreed by them.

This policy has been developed to create a framework within which to reconcile these various issues.

## Objective

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TGH is committed to complying with French, European and international standards and the associated regulations that prohibit dealing with proscribed groups and individuals associated with unlawful activities, such as terrorism or other criminal practices, included on the United Nations Security Council Consolidated List or other similar lists.

Accordingly, TGH has developed a structured framework to ensure adherence to standards of reasonable diligence and compliance with anti-terro-

risk and money laundering legislation and other measures. TGH will adhere to these standards when implementing its programmes and projects, according to the conditions and within the limits set out above. It will also ensure adherence to these standards by its implementation partners when they are acting on its behalf.

## Scope

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All TGH national and international staff, partner organisations, consultants, service providers and suppliers must be informed of this policy and are required to act in accordance with it when collaborating with TGH or working on its behalf.

This policy has been approved by the Bureau of the TGH Board of directors. It must be read and interpreted in conjunction with the Anti-Fraud and Corruption Policy and the whistleblowing mechanisms set out in it.

## TGH commitments

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TGH undertakes to take all appropriate measures to prevent the funding of proscribed activities, organisations and individuals that could result in the misappropriation of aid or humanitarian assistance.

TGH will not enter into any transaction with individuals or organisations associated with terrorism and other criminal activities, and in particular with individuals or entities included on the United Nations Security Council Consolidated List or other similar lists. Moreover, TGH will be vigilant in ensuring that none of its premises, vehicles or other goods, personnel and other resources, of any kind whatsoever, or those of its partners, are used for activities likely to support or simply appear to condone the activities of proscribed organisations or individuals.

Accordingly, TGH undertakes to:

- Ensure the systematic implementation of procedures that prevent TGH from entering into a working relationship, either directly or indirectly, with a proscribed organisation or an individual who is suspected of criminal activities;

- Provide its staff, service providers or partners of any kind with full information on its commitment to due diligence and its practical implications;
- Maintain rigorous documentation to demonstrate TGH's adherence to its commitments;
- Maintain high-quality relationships with its staff, service providers and partners through formalised and transparent verification and control procedures;
- Ensure that the commitment to due diligence does not result in any breach of full and complete adherence to humanitarian principles and does not expose TGH staff to increased risks;
- Not to accept any funding associated with requirements that seem to TGH to contravene its principles of intervention and/or take on any financial risks that may result from the limitations defined by TGH on the verification requirements imposed on it.

# Implementation

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Alongside the whistleblowing mechanisms already in place, TGH will ensure systematic screening of **all** its personnel, **of** service providers, suppliers and partners. TGH will achieve this by using professional software that also guarantees the protection of personal data.

Screening will be carried out by TGH headquarters in accordance with the conditions described below so as to limit the security risks involved for field staff and guarantee data protection:

## Staff

1. All new employees will be subject to individual ad hoc screening, prior to hiring wherever possible, and in all circumstances before the end of their probationary period.
2. Consolidated lists of staff in each intervention area will be screened at least every two months.

## Suppliers and service providers

1. Any supplier or service provider bidding for a contract of a value equal to or in excess of €5,000 will be screened prior to the signature of any agreement.
2. Consolidated lists of all suppliers and service providers for contracts valued at less than €5,000 will be screened at least monthly.

## Partners

1. The senior executives – management and Board of Directors or Trustees – of any current or future partner will be screened.
2. Consolidated lists of all partners will be screened at least twice a year.

## Exclusions

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### Screening of beneficiaries

TGH does not screen beneficiaries, even though this is increasingly demanded by donors. Apart from its highly questionable relevance from the perspective of combating terrorism and criminality, this would contravene TGH's Code of Conduct and the principles it endorses, particularly in terms of impartiality, neutrality, independence and non-discrimination. Furthermore, screening beneficiaries would contradict personal data protection requirements, with which TGH strives to comply.

TGH will seek to secure an exemption when entering into a relationship with a donor that requires screening of beneficiaries. Any breach of the principle of non-screening of beneficiaries must be analysed and justified in detail by the operational team, and approved by the Bureau of the Board of Trustees.

### Security

Where screening is identified as a significant factor in increased security risks, for example if it is a practice that is expressly condemned by the national authorities of a country in which TGH operates, it will either be limited or not applied. Exemptions will be sought and, if these are not granted, any current programmes and/or the examination of a project document may be stopped.

# Information

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## Screened individuals or entities

Informing any individual or entity that a positive entry concerning them has been found in the screening software used by TGH should be avoided as far as possible, in order to minimise the impact of screening in terms of security risks for field staff. Accordingly, screening should be carried out prior to entering into a formal relationship with any individual or entity whenever possible.

Should a positive entry concerning an individual or entity be found once they are already involved in a formal relationship with TGH, the decision to inform them must be assessed on a case-by-case basis according to the local context and the legal and security environment.

## Donors

Some donors state that they must be informed about any positive entry. TGH accepts this obligation, but limits it to strictly necessary information. No other information other than that used for detection via the screening software will be provided, and TGH undertakes not to consider any parallel or subsequent request concerning the entity or individual concerned.

Where there is no express requirement to provide information, TGH will confine itself to keeping the information available for the conduct of audits, as it does for other evidential documents.

## TGH bodies

Insofar as any positive entry will result in the automatic suspension of any formal relationship with the individual or entity concerned, without the need for any formal confirmation, it is not deemed necessary to provide information on each positive report systematically to TGH's governing bodies (Management and Bureau of the Board of Trustees). Nonetheless, these bodies will be kept informed through the production of a bi-annual statistical report. They may, however, be alerted in certain special cases, for example when an individual or entity that has an existing relationship with TGH is found to be newly included in the screening lists used.



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