



Anti-Terrorism Policy of East Action Organization

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East Action's Legal Status:

Registered with the F.D.R.E Authority for Civil Society Organizations (ACSO) with registration number 6812 and proclamation No 1113/ 2019 at the national level.

Registered with the regional Attorney General's prosecution office in 2019 at the local level.

Program Focus:

EAO actively intervenes in humanitarian response, resilience, conflict resolution, climate change, livelihoods, WASH, education, health, child protection, and pastoral support.

Operates across 6 zones and 19 woredas in the Somali regional state.

Recently expanded to the Benishangul region and dire dawa city administration

Policies and Experience:

Comprehensive set of manuals and policies guiding operations, governance, and ethical conduct.

Has been actively working in the Somali region since 2019.

Appointed 11 focal persons, each responsible for a specific zone.

Main office in Jigjiga, with a liaison office in Addis Ababa.

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1. Introduction

East Action recognizes the risk of its funding being diverted to support terrorist activities. As sectors tighten safeguards against terrorism, the development sector may become a target. This policy ensures EAO's commitment to anti-terrorism activities and outlines measures to prevent the misuse of funds.

EAO's funders impose strict obligations to ensure that funds are not used to support terrorist activities. Non-compliance could damage EAO's reputation and expose it to penalties. This policy articulates EAO's commitment to avoid involvement in terrorism and financing thereof.

. Background

As a national NGO operating within Ethiopia, EAO Organization recognizes the risk that its funds could be misused to finance or support terrorist activities. Given the tightening of safeguards against terrorist abuse across various sectors, there is an increased risk of terrorist organizations targeting NGOs.

Different countries have varying regulations and safeguards. This policy aims to ensure a consistent approach in alignment with Ethiopian law, emphasizing the importance of governance, financial management, and partner oversight in preventing aid diversion. This document serves as a guide for preventing, detecting, and responding to any suspected terrorist activity, thereby safeguarding EA Organization's reputation and community support.

2. Scope

This policy is mandatory for all individuals working for or on behalf of EAO, including staff, consultants, interns, volunteers, and board members. It also applies to partners receiving EAO funding that do not have their own anti-terrorism policy. Scope

This policy applies to all EAO Organization board members, staff, financial service providers, contractors, and private donors, as well as all partner organizations and their respective board members, staff, financial service providers, contractors, and sub-grantees implementing projects funded by EAO Organization.

3. Policy Statement

EAO renounces all forms of terrorism and will not knowingly support or encourage terrorism or those who finance it. The organization is committed to ensuring that neither its funds nor donor funds are used

to support individuals or entities associated with terrorism. EAO recognizes the importance of adhering to relevant regulations and legislation regarding co2. Policy Statement

EAO Organization firmly renounces all forms of terrorism and will never knowingly support, tolerate, or encourage terrorist activities. In alignment with Ethiopian law and international principles, EAO Organization commits to ensuring that none of its funds are used, directly or indirectly, to support individuals or entities associated with terrorism.

4. What is Terrorism?

Terrorism is defined by certain serious offenses that may seriously damage a country or international organization, aiming to intimidate a population or compel a government or organization to act or refrain from acting.

The crime of terrorist financing involves unlawfully providing or collecting funds with the intention of supporting acts intended to cause death or serious injury to civilians, with the aim of intimidating a population or compelling a government or organization.

5. Efforts to Fight Financing Terrorism

Efforts must be made to prevent, detect, and punish the flow of illegal funds that finance terrorism. This includes implementing mechanisms to routinely review financial transactions to identify and flag suspicious activities.

6. Mechanisms to Fight Terrorism

6.1. Approach

EAO will adopt a proactive approach to mitigate the risk of funding diversion to terrorist activities.

6.2. Summary Procedure on Actions Taken Upon a Report

Reports of suspicious activity will be addressed promptly and investigated according to established protocols.

6.3. Detailed Procedure for Reporting

Individuals are encouraged to report any suspicions of terrorism-related activities through designated channels.

6.4. Contacting EAO Anonymously/Hotline

A confidential hotline will be available for individuals to report concerns anonymously.

6.5. Response to a Report

Upon receiving a report, EAO will initiate a thorough investigation and take appropriate actions based on findings.

7. EAO Responsibilities

EAO is responsible for ensuring compliance with this policy and for promoting awareness among staff regarding anti-terrorism measures.

8. EAO Leadership Team Responsibilities

The Leadership Team will oversee the implementation of this policy and ensure that all staff are informed of their responsibilities.

9. Staff Responsibilities

All staff members are required to be vigilant and report any suspicious activities immediately. They must familiarize themselves with this policy and its implications.

10. Enabling Reports

EAO will create an environment that encourages the reporting of suspicious activities without fear of retaliation.

11. Reprisal

Any form of reprisal against individuals who report concerns in good faith will not be tolerated.

12. Malicious Allegations

EAO will address any malicious allegations made against individuals or entities promptly and seriously.

13. Data Protection and Confidentiality

All reports and investigations will be conducted with the utmost respect for confidentiality and data protection.

14. Monitoring of This Policy

EAO will regularly review and update this policy to ensure its effectiveness and compliance with relevant regulations.

Sources of Authority

EAO Organization recognizes relevant national regulations and legislation, including anti-terrorism laws, as well as its own internal rules and regulations.

5. Procedures

5.1. Approach

EAO Organization implements a proactive approach focused on "deter, detect, prevent, and respond" to minimize the risk of aid diversion and terrorism financing. The following measures are employed:

Conduct regular risk analyses concerning anti-terrorism activities, reviewing legal requirements and security risks.

Enforce a strict code of conduct among staff and partner organizations with an emphasis on anti-diversion.

Maintain comprehensive financial records and publish annual financial statements detailing income and expenditures.

Conduct annual external audits of all expenses and specific projects.

Carry out third-party reference checks on individuals with contractual links to EAO Organization to ensure they are not associated with terrorism.

Provide regular training to staff and partners on anti-diversion policies and practices.

Conduct in-depth due diligence of partners and sub-grantees, including checks against sanctions lists.

Apply a "know your supplier" principle for all procurements.

5.2. Enforcement

Senior Managers are responsible for:

Ensuring compliance with all relevant legislation and EAO Organization policies.

Ensuring partner organizations comply with relevant legislation and policies.

Managers are responsible for:

Communicating this policy to partner organizations and ensuring compliance.

Approving activities after all conditions have been met.

Reporting breaches of this policy to the Board of Directors.

Employees and Volunteers are responsible for:

Complying with this policy and relevant legislation.

HR Department is responsible for:

Recruitment and additional reference checks in sensitive areas.

Ensuring adherence to the code of conduct and data protection legislation.

Safety & Security Department is responsible for:

Providing updated risk assessments for each intervention area.

Finance Department is responsible for:

Maintaining financial records and tracking expenditures.

Ensuring internal controls and due diligence in financial operations.

Procurement and IT Departments are responsible for:

Managing procurement based on the "know your supplier" principle.

Administering ethical procurement policies.

Program Department is responsible for:

Due diligence and selection of partner organizations.

Training and oversight of partner organizations.

Internal Audit and Compliance Department is responsible for:

Monitoring adherence to this policy by staff, partner organizations, and contractors.

Providing independent assurance regarding operations.

This refined policy aligns with Ethiopian law and the operational context of EAO Organization while ensuring a strong commitment to preventing terrorism financing.

1.1. Reporting Requirements and Consequences for Violations

Anyone with concerns, suspicions, or knowledge of incidents regarding violations of this Policy is obligated to immediately report them to the Compliance Department at EAO via the designated reporting channels.

The reporting system ensures adequate confidentiality and allows for anonymous reporting. Any report submitted to management or via national complaint lines must be forwarded to the Compliance Department through the appropriate channels.

Individuals who report suspected violations or provide information regarding such violations in good faith will not face any disadvantage or retaliation, even if the report is later found to be unfounded. It is not the responsibility of employees, contributors, or reporters to conduct investigations, gather evidence, or determine whether a violation of this Policy occurred.

Deliberately false accusations will not be tolerated. Failing to report a suspected violation constitutes a violation of EAO's Code of Conduct and this Policy.

Violations of this Policy may result in disciplinary measures, including immediate termination and/or the annulment of cooperation agreements. EAO reserves the right to report criminal offenses in compliance with applicable laws.

For additional information, please refer to the following contact:

Whistleblowing Email: Ethiopia: whistleblower@eastaction.org

For further information please contact us

Telephone numbers: +251 252 78 07 08//251901222224+251915330907+251975054143

Email: info@eastaction.org

drnejatnejib@eastaction.org

Skype Name: live:.cid.c1547d8d2e5b1f4a

Local Skype Number: (815) 570-5273

P.o.Box = 438

Fax: +251252780706

Website: <https://eastaction.org/>

Face B page: <https://www.facebook.com/eastaction.org>

<https://maps.app.goo.gl/SyaHtsT34yR6xdmF8>

Email::addisababaliaison@eastaction.org

Tel: +251115579668/0915741075