



# GLOBAL SANCTIONS POLICY

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## Global Sanctions Policy

### 1. Introduction

Human Appeal is an incorporated INGO working across the globe to strengthen humanity's fight against poverty, social injustice and natural disaster, through the provision of immediate relief and establishment of self-sustaining development programmes. Our vision is to contribute to a just, caring and sustainable world free of poverty. Human Appeal does this by raising money to fund immediate and long-term sustainable solutions and empower local communities.

### 2. Policy Statement

Human Appeal is committed to complying with sanctions authorities and regulations in all jurisdictions through which it transacts. Sanctions risks expose the organisation to vulnerabilities in its operations and diminishes Human Appeal's efforts to effectively carry out its mission. It is therefore Human Appeal's policy to undertake a zero-tolerance approach to transactions where a sanctions risk is identified. Human Appeal requires its staff, volunteers, contractors, and partners to comply with its Global Sanctions Policy.

### 3. What Are Sanctions?

Sanctions can take the form of any of a range of restrictive or coercive measures. They can include arms embargoes, travel bans, asset freezes, reduced diplomatic links, reductions/cessations of military relationships, suspension from international organisations, withdrawal of aid, trade embargoes, and other restrictions. The primary concern is ensuring that Human Appeal's activities do not inure to the benefit of parties who have been targeted for sanctions, unless an exemption, license, or other authorisation exists that allows for any transaction with that party to occur.

Human Appeal acknowledges that violations can occur from the direct and indirect provision of services, as well as through processing payments in U.S. dollars where a sanctioned jurisdiction or party is present. As such, Human Appeal requires its staff, volunteers, contractors, and partners to act at all times in a manner consistent with this Policy.

### 4. Consolidated Sanctions Lists and Screening

To carry out this Policy, Human Appeal utilizes Thomson Reuters World Check to screen staff, volunteers, contractors, donors, beneficiaries, and other third parties against the following Consolidated Sanctions Lists:

- US Department of the Treasury's Office of Foreign Assets Control (OFAC) Specially Designated Nationals and Blocked Persons (SDN) List
- UK HM Treasury's Office of Financial Sanctions Implementation (OFSI) Consolidated List and Ukraine List of Persons
- UN Restrictive Measures

The purpose of screening parties against sanctions lists is to identify risks associated with individuals and organisations that engage with Human Appeal as follows:

1. All partner organisations that undertake projects on behalf of Human Appeal;
2. All suppliers and contractors;
3. All banks, FX providers and financial institutions with whom Human Appeal engages in financial dealings;
4. All donors (individuals and organisations) who contribute in excess of E5,000;
5. All individuals/beneficiaries who receive cash as part of cash-based programme interventions (when part of donor requirements); and
6. Staff and volunteers.

Staff, volunteers, contractors, and partners should refer to Human Appeal's Sanctions Screening Policy and Procedures for additional guidance.

## 5. Social Media Screening/Media Screening

All due diligence checks completed also include a social media check and a Media check.

## 6. Sanctions Risk Management

Human Appeal's Global Sanctions Policy and accompanying Sanctions Screening Policy and Procedures are intended to mitigate risk across all operations, including staff and volunteer on boarding, receipt and disbursement of monetary donations, or otherwise dealing with third parties. These internal procedures have been incorporated into Human Appeal's due diligence and partnership appraisal processes and help protect the organisation from exposure to sanctions risks.

Human Appeal will endeavour to:

- Have systems, processes, procedures and controls in place to ensure that sanctions risks are identified and mitigated;
- Undertake screening and risk rating processes to identify risks associated with individuals and organisations working for, with, or on behalf of Human Appeal;
- Train staff to ensure they have an understanding of sanctions compliance and how to escalate identified sanctions risks;
- Incorporate sanctions compliance in tandem with Human Appeal's anti-money laundering and anti-terrorism policies and procedures to streamline compliance efforts across the organisation;
- Meet its obligations to comply with the regulations and reporting requirements to the Charity Commission, UK Office of Financial Sanctions Implementation (OFSI), and/or OFAC (as and when appropriate); and
- The Board and Executive will have a standing item on the agenda to question whether any incidents have arisen and how those instances have been addressed.

Sanctions risk is managed through the oversight of the Director of Finance and Services and Internal Audit staff. It is for Human Appeal to take reasonable steps to investigate potential sanctions exposure and implement a remedial response as appropriate under the circumstances.

## 7. Compliance

Compliance requires all staff, volunteers, contractors, and partners to familiarize themselves with this Policy and accompanying Sanctions Screening Policy and Procedures as they relate to their roles and responsibilities with the organisation. Compliance requires that such policies and procedures are followed diligently and that sanctions alerts are managed in accordance with Human Appeal's due diligence processes and escalated to appropriate staff.

## 8. Policy Review

This Policy and accompanying Sanctions Screening Policy and Procedures will be reviewed on a bi-annual basis, or as necessary, to ensure continuing compliance with applicable sanctions authorities and regulations. Further, the Director of Finance and Services will regularly review implementation of these policies and procedures to monitor their effectiveness. Any improvements or identified necessary revisions will be made as soon as possible. Internal control systems and procedures will be subject to regular audits to provide assurances that they are effective in mitigating sanctions risks.