



POLICY ON ANTI-TERRORISM

INTRODUCTION

This policy, which expresses UPP's position on terrorism, allows it to maintain high ethical standards, protect its reputation, and implement its humanitarian and development mandate.

UPP renounces all forms of terrorism and will never knowingly support, tolerate or encourage terrorism or the activities of those who embrace terrorism and will make every effort to ensure that its resources are not used to facilitate terrorist activity.

This policy sets out UPP's response to the risk of dealing with individuals and organisations associated with terrorism.

This policy will be communicated to all UPP staff, as well as to relevant associates, board members, partners and donors and other individuals and entities as needed.

SCOPE OF IMPLEMENTATION

This policy applies to all individuals working at all levels, including partners, consultants, employees (whether permanent, fixed-term or temporary), consultants and contractors, volunteers, associates and board members or any other person associated with UPP, wherever located.

PRINCIPLES

1. For UPP use, the term terrorism is the one defined by the UN Security Council Resolution 1566 (2004):
"Criminal acts, including against civilians, committed with the intent to cause death or serious bodily injury, or taking of hostages, with the purpose to provoke a state of terror in the general public or in a group of persons or particular persons, intimidate a population or compel a government or an international organization to do or to abstain from doing any act".
2. For UPP the term "Criminal acts" should be strictly referred to behaviours that are not related to the correct and fair exercise of fundamental rights and freedoms as provided by the relevant International Charters and Covenants on the sector.
3. UPP will follow the International Law as well as the International Humanitarian Law.
4. UPP will acknowledge the counter-terrorism legislations set up by the international community, the donors and the country of operation, but disapprove all counter-terrorism measures which violate the known international Law, especially the law on fundamental rights and freedoms.



5. UPP will not commit any act, which could be considered as terrorist act by the UN Security Council Resolution 1566 (2004).
6. UPP will not condone acts which would be considered as terrorism by the UN Security Council Resolution 1566 (2004).
7. UPP will not provide assistance, of any form, to any groups/individuals considered as terrorists by the international community and the donor or that should be listed terrorist organizations and/or proscribed persons or entities.
8. UPP will not cooperate with any groups/individuals considered as terrorists by the international community and the donor or that should be listed terrorist organizations and/or proscribed persons or entities.
9. UPP will not collaborate with known-associates of any groups/individuals considered as terrorists by the international community and the donor or that should be listed terrorist organizations and/or proscribed persons or entities.
10. UPP will confirm the identity, credentials and good standing of the people or organisations it supports and will check that these people or organisations are not listed as terrorist organizations and/or proscribed persons or entities.
11. UPP will not knowingly remit any funds to known or suspected terrorist organisations or individuals, under international law.
12. UPP will report any known or suspected terrorist links to the relevant national authority.
13. UPP will take all necessary precautions not to expose its international and local staff to any danger, in particular when working in areas/countries where the risk of terrorist activity is exacerbated.

RESPONSIBILITIES

The Executive Director will be responsible for ensuring that personnel of UPP carry out the following procedures at least annually to minimise the risk of dealing with terrorist organisations.

PROCEDURES

1. UPP staff members must know the identity, credentials and good standing of their partners and recipient organisations (i.e. what they do, where they operate, who are their key decision makers and staff)
2. UPP recruiters will check on any known associability of the candidate with terrorist organizations or individuals which are listed, upon the provisions on background checks provided in Staff Handbook.
3. Care will be taken to only transmit funds from UPP using reputable banks and other financial institutions for this purpose.



3. Prior to funding any organisation, details of funded entities and their office bearers will be compared to existing lists of terrorist and proscribed organisations. The relevant lists can be obtained from:

- the Italian Government websites and Consulates and Embassies at country level;
- the country of operation list;
- the international black lists.

Where recipient organisations or individuals are found to be on either list, forwarding funds will cease and the national relevant authorities will be informed immediately.

REPORTING AND INVESTIGATION

Any breach of this policy must be immediately reported following the indications in paragraph 4.7.1 of the Staff Handbook on "Reporting and Internal Investigation".

**Approved by the Executive Director
Novella Mori**

On the 3rd January 2018.