



# **AKTION AMAZONAS**

# **ANTI-TERROR POLICY**

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## Introduction: Zero tolerance towards terrorism

Aktion Amazonas (AKAM) does not operate in countries where persons, groups, or organizations with terror-related aims may be present.

Aktion Amazonas operates exclusively in South America, with a primary focus on Peru and Bolivia. Our Anti-Terror Policy reflects our zero-tolerance stance toward terrorism and underscores our commitment to preventing the unintended financing of individuals, groups, or entities associated with terrorism.

Aktion Amazonas adheres strictly to the guidelines set by the **United Nations Security Council Consolidated List** and the **European Union List of Designated Persons and Entities Subject to Restrictive Measures**. These frameworks guide our efforts to ensure that no funds, resources, or activities are directly or indirectly linked to individuals, groups, or organizations associated with terror-related aims.

As part of this commitment, Aktion Amazonas does not engage in activities or partnerships in regions where such groups or entities may be present, ensuring alignment with our values and international obligations.

## Implementation of the Anti-Terror Policy

Aktion Amazonas (AKAM) upholds a strict zero-tolerance approach toward terrorism concerning employees, business partners, programme or project partners, and all other collaborators. AKAM is committed to ensuring that funds, resources, and assets are not made available to, or in any way benefit, individuals, groups, or entities listed on the UN or EU terror lists.

All employees and partners must understand, accept, and enforce AKAM's Anti-Terror Policy and its principle of zero tolerance toward terrorism.

The implementation of AKAM's Anti-Terror Policy is based on three core elements:

- **Prevention,**
- **Notification,**
- **Follow-up and sanctions.**

## Preventive Measures

- **Partner Contracts:**

All partner agreements include an anti-terror clause requiring partners to confirm they are not listed on UN or EU terror lists. Partners must also ensure that transferred funds, assets, or resources do not benefit persons or entities on these lists, including in local collaborations or aid distribution. Partners are required to regularly review the updated terror lists.

- **Procurement of Goods and Services:**

For procurements exceeding DKK 250,000, suppliers are screened against the UN and EU terror lists. AKAM adheres to Danish and EU procurement regulations.

## UN and EU Terror Lists

- The UN terror list is updated at least every six months and is accessible UNs webpage: <https://main.un.org/securitycouncil/en/sanctions/1267>
- The EU terror list, revised by the European Council every six months, is available on the EU Sanctions Map: <https://www.sanctionsmap.eu/#/main>
- On the EU Sanctions Map, you can quickly get an overview of current UN and EU sanctions: <https://www.sanctionsmap.eu/#/main>

## Notification and Follow-Up

Employees and partners must immediately notify their supervisor or AKAM contact if they suspect or become aware that individuals or entities AKAM collaborates with are listed on UN or EU terror lists. AKAM will report such findings to relevant donors.

## Sanctions

If there is reasonable suspicion that funds, assets, or resources have benefited terror-listed individuals, groups, or entities, sanctions include:

- Termination of contracts,
- Repayment of funds.

All sanctions are determined by AKAM senior management, in consultation with relevant partners and donors.