

Anti-Terrorism Policy



Last Updated: 8 June 2026



Registered Charity



Vanni Hope (ABN: 19614675231) is a charity registered with the ACNC.

Purpose

The purpose of this Anti-Terrorism Policy (**this Policy**) is to prevent, detect and deter facilitation and unknowing support of individuals or organisations associated with Terrorism and/or Organised Crime.

Vanni Hope complies with the provisions of the *Criminal Code Act 1995* (Cth) and the *Charter of the United Nations Act 1945* (Cth) to uphold its integrity as a humanitarian organisation. Moreover, Vanni Hope shares the commitments expressed by the Australian Department of Foreign Affairs and Trade (DFAT) in its Terrorism Resourcing Risk Management Statement.

This Policy should be read in conjunction with Vanni Hope's other policies, including the Anti-Corruption and Anti-Fraud Policy and the Complaints Handling and Whistleblowing Policy.

Definition of Key Terms

Organised Crime means a conspiratorial enterprise engaged in illegal activities as a means of generating income.

Proscribed Individual or Organisation means an individual or group that is:

- designated as a terrorist organisation under the Criminal Code Act 1995 (Cth) as listed on the National Security Australia website at:
www.nationalsecurity.gov.au/listedterroristorganisations; and/or
- subject to targeted sanctions in Australia as named on DFAT's consolidated list of proscribed persons and organisations which can be accessed at:
<https://www.dfat.gov.au/internationalrelations/security/sanctions/consolidated-list>.

Reportable Incident refers to any suspected or actual association with, provision of resources to, or exact match of an organisation or individual's name with:

- a Proscribed Individual or Organisation;
- any other person or organisation associated with terrorism; or
- any person or organisation associated with Organised Crime.

Terrorism means the act, or threat of action, where the action causes certain defined forms of harm or interference, and the action is done, or the threat is made with the intention of advancing a political, religious or ideological cause.

Scope

This Policy applies to any officeholder, member of staff, volunteer or contractor (each a Representative) of Vanni Hope involved in project, partnership, or organisational decision-making roles.

Policy Obligations

Vanni Hope has a zero-tolerance policy towards any association with Terrorism and Organised Crime. Vanni Hope ensures:

- its funds are not provided directly or indirectly to Proscribed Individuals or Organisations, or individuals/organisations associated with Organised Crime;
- its Representatives and, if applicable, any partner, are not associated directly or indirectly with Proscribed Individuals or Organisations, or individuals/organisations associated with Organised Crime;
- its Representative (and if applicable, its partners) adhere to and comply with the relevant laws, regulations and policies of Australia and the countries in which Vanni Hope operates; and
- any Reportable Incidents are immediately notified to the Australian Government donor and, if appropriate, to the National Security Hotline and the Australian Federal Police (see 'Dealing with suspected or actual incidents' below).
- partner organisations are required to comply with obligations equivalent to those in this Policy, and this requirement is formalised in any Memoranda of Understanding (MOUs) or partnership agreements entered into by Vanni Hope.

Applicable Procedures

Vanni Hope has and will continue to review the appropriate processes and systems it has put in place to prevent the facilitation of Terrorism financing or Organised Crime. Vanni Hope will comply with the following procedures.

Policy

A. Organisational Due Diligence

With respect to any proposed or ongoing project or program sponsored by Vanni Hope, the Board of Directors will conduct mandatory checks to ensure that no individual or organisation that Vanni Hope is or will be associated with is a Proscribed Individual or Organisation, which can be determined by accessing the:

- the National Security Australia website at:
www.nationalsecurity.gov.au/listedterroristorganisations; or
- DFAT's consolidated list of proscribed organisations at
<http://www.dfat.gov.au/sanctions/consolidatedlist.html>.

B. Vanni Hope Staff

- Representatives and partners of Vanni Hope may be subjected to a criminal record check in Australia and/or the relevant country of operation (most likely, Sri Lanka), if appropriate.
- **Staff Awareness and Accountability:** Staff members are informed of compliance requirements, including anti-terrorism obligations, and are required to adhere to organisational policies and ethical standards.
- **Procurement Controls:** All procurement processes follow transparent procedures, including obtaining quotations, supplier verification, and proper documentation to ensure legitimacy and prevent misuse of funds.
- **Zero Tolerance Policy:** Vanni Hope maintains a zero-tolerance approach toward any form of terrorism financing or support. Any suspicion or identified risk will be immediately reported to relevant authorities and addressed appropriately.

C. Dealing with suspected or actual incidents

- Responsibility for handling Reportable Incidents:
 - Primary responsibility for dealing with any Reportable Incidents in accordance with this Policy rests with the Vanni Hope Managing Director (the **Reporting Officer**).
- Notifying the Reportable Incidents:
 - If any Representative becomes aware of a Reportable Incident, they must inform the Reporting Officer immediately (i.e. within 24 hours) emailing ranjan@vannihope.org.au. A 'Reportable Incident Register' must be maintained by the Vanni Hope Managing Director or a delegate of the Vanni Hope Managing Director.
 - If the Reportable Incident concerns the Reporting Officer, or the person feels uncomfortable notifying the Reporting Officer, then the person should approach another member of the Board of Directors of Vanni Hope or the relevant project co-ordinator/leader.
- Reporting to DFAT
 - Vanni Hope must report any of the following incidents to DFAT, within 48 hours of becoming aware of the incident by emailing counter-terrorism.resourcing@dfat.gov.au:
 - any suspected or actual association with, or provision of resources to a Proscribed Individual or Organisation;
 - any suspected or actual association with, or provision of resources to any other person or organisation associated with Terrorism; or
 - any exact matches of organisation names to the lists of Proscribed Individuals or Organisations.
- Reporting to law enforcement authorities:
 - For all other suspected or actual acts of Terrorism financing, Vanni Hope must report the matter to the National Security Hotline:
 - 1800 123 400 (inside Australia)
 - +61 1300 123 401 (outside Australia)



Review

This Policy will be reviewed once every two years to ensure that the policy is operating effectively.

Date	Version	Review Description	Reviewed by	Approved by
Feb 2025	1	New template created	Virosh Poologasundaram	Board of Directors
June 2026	2	Complete reformat and general update of policy	Abinaja Yogarajah	Board of Directors