

COTER MEASURES AND ITS APPLICATION FOR ACTION AGAINST HUNGER SPAIN

Application of the COTER measures

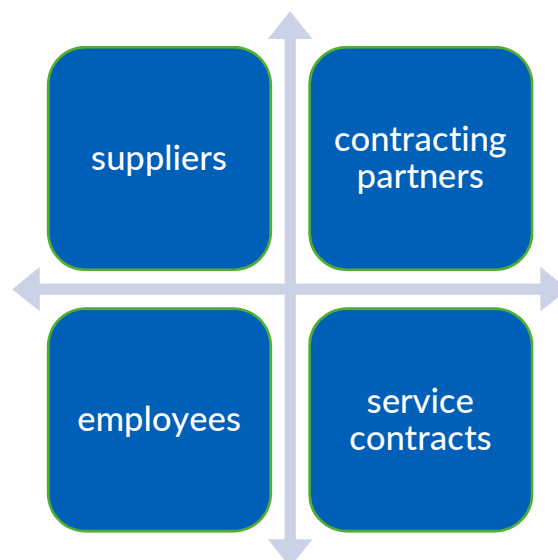
Purpose of the procedure: in order to comply with anti-terrorism provisions set out in some of our donors' funding contracts, we shall take measures to ensure that Action Against Hunger, when implementing humanitarian programs, do not finance individuals or groups involved in terrorism, according to "anti-terrorism" lists referred to by the concerned donors.

The procedure consists in comparing legal or natural persons' personal data with anti-terrorism lists referred to by the Donor in order to check whether these legal or natural persons' names are included on one or several of those lists (methodology called "list checking").

This list checking concerns suppliers, partners and employees. The screening also concerns the managing team, both at mission and headquarter level.

List Checking

Action Against Hunger is equipped with the screening software WatchDogPro which is regularly updated (web-based) and fully in compliance with US Office of Foreign Assets Control (OFAC).



Suppliers

Action Against Hunger assess and vets each of our service providers and/or vendors. The KitLog V.3. are the formal logistics procedures developed and regularly update by Action Against Hunger International. This kit details all relevant procedures for any logistical transaction (and associated administrative ones). All service providers and/or vendors are 'list checked' utilizing WatchDogPro software. The Action Against Hunger Good Business Regulations which are our grounds for professional



working relationships and explicitly have a clause to emphasise that suppliers must be aware of, and adhere to, applicable anti-terrorism regulations, are annexed to all service provider/vendor contracts.

1. **Action Against Hunger integrates in each supplier contract the clause of the donor contract, using the formats already integrated in the kitlog.**
2. **Purchases**

>10.000€	All suppliers checked by HQ Logistics prior to the purchase
<10.000€	Monthly post-screening of suppliers by HQ Logistics for randomly chosen procurements dossiers

Contracting partners

Action Against Hunger works specifically through its global Action Against Hunger International network and their partners in the field. The Action Against Hunger Partnership Guidelines and Toolbox guides the organization in the identification and management of relationships with partner organizations. Chapter 2 of the guidelines details the process of identifying and mobilizing a partner organization and the selection criteria and due diligence that Action Against Hunger must undertake.

1. **Each partner (sub contracting) needs to provide information on its structure and senior management team and board who will be list checked systematically and prior by HQ operations department by desk officers**
2. **Action Against Hunger integrates in each partner MoU and/or contract the clause of the donor contract and the list check by Action Against Hunger.**
3. **If this is a multi-year partnership, the screening must be carried out once a year.**

Action Against Hunger Employees, board members and service contracts

Action Against Hunger receives funding from for example the United States Government for programming purposes, to be in compliance with the Executive Order # 13224, which requires that all employees paid by funds provided by USG have been properly screened against the US Department of State list of terrorists, to ensure that Action Against Hunger is not funding any terrorist or terrorists' organization.

1. **Action Against Hunger needs to take into account the country specific labour laws and ensure compliance. With each Action Against Hunger employee an approval letter will be requested to sign to ensure data protection rules are applied.**
2. **The complete list of employees will be list checked every six months through HQ HR department through Watchdog software.**

The fact that a person's name turns out to be included on one or several of anti-terrorism lists is qualified hereafter as a "hit".

Consequence of a « hit » in general:

A priori check list: the file is not validated, so the purchase or contract will not be made.

A posteriori check list: the concerned purchase(s) shall not be charged to the Donor. Or the partnership will not be implemented or cancelled (posteriori)



Action Against Hunger shall also question and reconsider any further collaboration with this supplier, by means, when possible, of an inquiry.

Persons in charge of the list check and the constitution of the source files:

- List of persons in OPE/LOG/HR and operations department.

Archiving the consolidated files in full confidentiality, twice a year by operations quality department.

Consequences of a « hit » for Action Against Hunger employees:

- Expenses related to the concerned employee shall not be charged to the Donor.
- All other possible consequences of such a hit shall be determined on a case by case basis: any hit concerning an employee will be dealt with directly by Action Against Hunger executive director, at headquarter level, if possible in collaboration with the Country Director of the concerned mission.