

Syrian German Medical Association (SGMA)

Anti-Terrorism and Anti-Money Laundering Policy

1. Purpose

This policy is designed to ensure that SGMA's resources—financial, operational, and human—are not used directly or indirectly to support terrorism, terrorist activities, violent extremism, or entities under international or national sanctions. SGMA upholds strict compliance with international counter-terrorism legislation while maintaining full commitment to humanitarian neutrality and the principle of delivering aid based solely on need.

SGMA recognizes the complexity of operating in high-risk environments, particularly in conflict zones like Syria. This policy aims to provide clear guidance on legal obligations, risk management, screening procedures, and internal safeguards. It further promotes a culture of accountability and transparency that protects the organization's credibility, donor trust, and the rights of affected populations.

2. Scope

This policy is binding upon:

- SGMA board members, management, and staff,
- Volunteers, interns, and medical missions,
- Suppliers, logistics partners, and contractors,
- Donors and financial contributors,
- Grantees and implementing partners,
- Any third parties acting on SGMA's behalf or under its auspices.

It applies across all SGMA operations in Germany, Syria, and other international locations. It is enforced regardless of nationality, location, or role.

3. Legal and Normative Framework

SGMA complies with multiple legal, regulatory, and ethical frameworks, including:

- **United Nations Security Council Resolutions (UNSCRs)** related to counter-terrorism and financing of terrorism,
- **European Union (EU) Regulations** addressing financial sanctions, export controls, and terrorism listings,
- **German Federal Criminal Code (Strafgesetzbuch)** and banking laws,
- **Financial Action Task Force (FATF)** international standards and recommendations,
- **OECD Guidelines** for responsible business conduct,
- **Humanitarian principles**: neutrality, impartiality, independence, and humanity.

4. Prohibited Activities

SGMA strictly prohibits:

- Funding, facilitating, or engaging with individuals or organizations listed on international sanctions or terrorism watchlists,
- Transferring financial or material support to armed groups or politically affiliated militias,
- Using intermediaries to conceal the identity or affiliation of parties in transactions,
- Accepting funds or donations with unknown or unverifiable origin,

- Participating in dual-use procurement or logistics that could benefit sanctioned actors.

SGMA does not engage in negotiations or activities that legitimize proscribed groups or compromise its humanitarian neutrality.

5. Due Diligence and Risk-Based Approach

SGMA implements a rigorous, risk-based due diligence framework, including:

- **Screening:** All personnel, suppliers, and partners are screened against databases such as UN Sanctions List, EU Consolidated List, OFAC SDN List, and national terrorism lists.
- **Know Your Donor (KYD):** Background checks on donors, especially foreign or anonymous contributors. Suspicious donations are flagged and may be refused.
- **Know Your Partner (KYP):** Implementing partners are vetted through structured assessments, including their financial, legal, and political affiliations.
- **Contextual Risk Assessment:** Pre-operational assessments of regions for political control, active armed groups, and history of resource diversion.

High-risk activities or partners require additional approvals from senior management and documentation of mitigation plans.

6. Financial and Operational Controls

SGMA enforces strict internal controls across all financial and procurement functions:

- **Banking Protocols:** Use of reputable financial institutions; avoidance of informal money transfer systems (e.g., hawala) unless approved under emergency protocols.
- **Segregated Funds:** Separate accounts for donor-specific or restricted-use funding.
- **Documentation Standards:** Invoices, receipts, and payment records must be complete, accurate, and auditable.
- **Procurement Integrity:** Bids and tenders are processed transparently; vendors must certify compliance with anti-terrorism clauses.
- **Cash Controls:** Limited use of cash; if used, must be documented and reconciled promptly. Field offices are required to submit monthly cash flow reports.

All financial data are subject to internal audit, donor audits, and annual external audits.

7. Programmatic Safeguards and Humanitarian Integrity

To ensure aid is not diverted:

- **Beneficiary Registration:** Lists are verified through community outreach and cross-referencing with local civil structures.
- **Distribution Monitoring:** Field monitoring teams verify aid deliveries and report anomalies.
- **Post-Distribution Audits:** Random household visits and surveys validate that aid reached intended recipients.
- **Community Feedback Mechanisms:** Anonymous hotlines, complaint boxes, and community meetings allow for early detection of misconduct.
- **Partner Compliance:** MOUs and contracts include anti-terrorism clauses and obligations to report violations.

SGMA reserves the right to suspend or terminate partnerships when material risk of aid diversion is identified.

8. Reporting Suspicious Activity

All SGMA personnel, volunteers, and partners are required to report:

- Unusual or large donations,
- Attempts to bypass procurement or documentation requirements,
- Signs of coercion or interference from armed groups,
- Requests for personal payments or off-the-record transfers.

Reports may be made to:

- The **Compliance Officer**,
- The **Executive Director** or Board Chair (for high-level concerns),
- An **anonymous digital reporting platform** managed independently.

All reports are handled confidentially. Whistleblowers are protected under SGMA's Whistleblower Policy.

9. Training and Capacity Development

SGMA ensures that all staff and stakeholders are equipped to prevent, detect, and respond to terrorism-related risks:

- **Annual Training Modules:** Delivered to all employees, with tailored sessions for field staff, finance officers, and procurement teams.
- **Onboarding Briefings:** All new staff are trained on this policy during orientation.
- **Simulations and Case Studies:** Scenario-based learning to reinforce practical application.
- **Partner Support:** Training workshops and toolkits provided to partners in high-risk areas.
- **Refresher Training:** Conducted annually or as needed when new threats emerge.

10. Response, Investigation, and Sanctions

If a breach or violation is suspected:

- The Compliance Officer initiates a **preliminary review**, followed by a formal investigation.
- Legal counsel may be engaged, and donor agencies may be notified.
- The Governance and Ethics Committee oversees the process to ensure independence and integrity.

Sanctions for confirmed violations include:

- Termination of employment or partner agreements,
- Freezing or recovery of misused funds,
- Disclosure to relevant national or international authorities,
- Suspension of project activities where necessary.

In the event of reputational or operational harm, SGMA will implement a corrective action plan and communicate transparently with stakeholders.

11. Oversight, Monitoring, and Review

Oversight is conducted by the **Governance and Ethics Committee**, which:

- Reviews policy implementation through quarterly reports,
- Commissions third-party evaluations for high-risk programs,
- Revises the policy annually to incorporate evolving standards,
- Ensures all updates are communicated and adopted organization-wide.

Monitoring tools include:

- Regular compliance checklists,
- Incident logs and audit trails,
- Risk heatmaps updated quarterly,
- Stakeholder feedback loops.

12. Alignment with Humanitarian Principles

SGMA ensures that anti-terrorism measures do not compromise its duty to provide lifesaving assistance. All actions taken under this policy will:

- Be proportional to the level of risk,
- Avoid discrimination or exclusion based on political control or perceptions,
- Respect the independence of humanitarian operations.

Where necessary, SGMA will engage with donors and regulators to negotiate exceptions that preserve access to vulnerable populations while upholding legal obligations.

Approved by the SGMA Board of Directors on: 01.01.2025
To be reviewed annually by the Governance and Ethics Committee.