

Counter Terrorism Policy

1. Overview

Purpose

The purpose of this policy is to ensure that Fullife Foundation complies with Australian laws relating to counter terrorism and minimises the risk of support for terrorists or terrorist organisations.

Who does this policy apply to?

This policy applies to:

- Fullife Foundation Directors
- Fullife Foundation Volunteers
- Fullife Foundation Project Partners
- Participants of Ethiopia project visits
- any person who partners with Fullife Foundation in any capacity

Policy Changes

The Fullife Foundation Board will review this Policy every 2 years or earlier if warranted, for example if the Australian Government make changes to their counter-terrorism policy and laws.

Version Control Table

Version	Date	Changes	Created by	Authorised by
0.1	19.01.19	Initial draft	Janelle Murley	
0.2	25.04.19	Second draft	Janelle Murley	
1.0	21.09.20	Versioned up to final version New branding added 14.03.25	Janelle Murley	Fullife Foundation Board of Directors
1.1	12.09.25	Updated draft following Board review of policy	Janelle Murley	
2.0	10.10.25	Versioned up to v2.0 following Board approval	Janelle	Fullife Foundation Board of Directors

2. Legal Obligations

There are two main laws prohibiting activities in connection with terrorism and a third law related to counter-terrorism:

- Criminal Code Act1995 (Australian)
- Charter of the United Nations Act 1946 Anti-Money Laundering and Counter-Terrorism Financing Act 2006

The Department of Foreign Affairs and Trade (DFAT) maintains a consolidated list of all individuals and entities to which this terrorist asset freezing regime applies. This list can be accessed on the DFAT website [here](#). Australian organisations are responsible for ensuring that they do not do business with an individual or groups listed on the consolidated list.

In addition to the consolidated list, the Australian Government maintains a list of groups that are prescribed as terrorist organisations under the Criminal Code. This list of terrorist organisations can be accessed on the National Security Australia website [here](#).

3. Policy Statement

Fullife Foundation recognises that aid, development and other not for profit entities may be vulnerable to misuse by individuals and other organisations aiming to finance or support terrorist activity. Fullife Foundation recognises our responsibility to ensure that our funds, or funds held in trust by the organisation are not being directed to terrorist activities.

Fullife Foundation's policy is to take all reasonable efforts to ensure, to the best of its ability, that its funds are not directed to terrorist activities through:

- 3.1. Complying with relevant legislation
- 3.2. Carefully assessing potential project partners
- 3.3. Ensuring project partners are aware of this policy
- 3.4. Monitoring our partners for compliance with relevant counter-terrorism laws and regulations and are actively managing terrorism risks
- 3.5. Monitoring project and program activities to ensure funds are being used for the purposes for which they were approved and given
- 3.6. Ensuring Fullife Foundation accounting practices are verified by regular independent audits

4. Policy Implementation

Fullife Foundation implements this policy statement in the following ways:

4.1. Policy Awareness	<p>Fullife Foundation will:</p> <ol style="list-style-type: none"> i. Require all new Directors to read this policy ii. Make this policy available to Directors, partners and volunteers via its website iii. Ensure our project partners are aware of this policy in MOUs and Compliance Confirmation documentation
4.2. Managing Risk	<p>Fullife Foundation will:</p> <ol style="list-style-type: none"> i. Check the DFAT Consolidated List nor the Australian National Security list of terrorist organisations when forming a new partnerships and on an annual basis ii. Not knowingly partner with or transfer funds to anyone on the DFAT Consolidated List nor the Australian National Security list of terrorist organisations iii. Include an anti-terrorism clause in all Memorandas of Understanding iv. Require our Project Partners to periodically confirm that they are aware of this policy, and that they comply with relevant local, national, and international legal and regulatory requirements in relation to counter-terrorism v. Only transfer funds through regulated financial institutions vi. Have its finances verified through regular independent audits