



## **American Friends of the Episcopal Diocese of Jerusalem (“AFEDJ”) Policy on Anti-Terrorism**

**Policy Statement:** AFEDJ renounces all forms of terrorism and will never knowingly support, tolerate, or encourage terrorism or the activities of those who embrace terrorism. Consistent with numerous United Nations Security Council resolutions, including S/RES/1269 (1999), S/RES/1368 (2001), and S/RES/1373 (2001), AFEDJ is firmly committed to the international fight against terrorism and in particular against the financing of terrorism. It is the policy of AFEDJ to seek to ensure that none of its and its donor funds are used, directly or indirectly, to provide support to individuals or entities associated with terrorism. In accordance with this policy, AFEDJ undertakes to use reasonable efforts to ensure that none of its or its donor funds are used to provide support to individuals or entities associated with terrorism.

**Scope:** To demonstrate its vigilance and good faith desire to comply with the foregoing policy statement and applicable domestic anti-terrorism laws, AFEDJ will carry out the procedures described in this Policy on Anti-Terrorism (the “Policy”) to the extent reasonably justified by the circumstances, taking into account AFEDJ’s knowledge of and experience with the Episcopal Diocese of Jerusalem and its related institutions (collectively, the “Diocese”), the risk of diversion or abuse of AFEDJ resources, the size of the disbursement in question, and the cost of the procedures described below. This Policy applies to all AFEDJ trustees and staff. This Policy also applies to all associated organizations, including without limitation, the Diocese and each institution owned by the Diocese that AFEDJ supports through its gifts to the Diocese designated for the support of such institution (each, an “Institution”), and the board members and senior management of each Institution who are responsible for implementing projects with AFEDJ funding.

**Assessment of Diocese and Institutions:** AFEDJ will engage in an organizational assessment of the Diocese and the Institutions, including:

- visiting the Diocese/Institution and project sites to observe programming and community linkages;
- conducting detailed discussions about the values, governance, financial stewardship and prior program experience of the Diocese/Institution;
- reviewing brochures and reports; and
- communicating to the Diocese/Institution AFEDJ’s expectation of full transparency.

**Collection of Information:** AFEDJ will make a good faith effort to collect and retain information from the Diocese and the Institutions that is sufficient to conduct the screening below and otherwise assess their integrity. Such information may include, as appropriate and to the extent permitted under applicable law:

- name (including applicable acronyms and former names), address, phone number, and e-mail address of the Diocese/Institution;
- name (including any aliases), nationality, current country of residence, and place and date of birth of board members (or equivalent) and senior management (e.g., Bishop, CEO, CFO and senior program managers) of the Diocese/Institution;
- reasonably available descriptive materials describing the Diocese/Institution that provide assurance to AFEDJ regarding the integrity of the Diocese/Institution;
- reasonably available materials describing the principal purpose of the Diocese/Institution including a list of current projects and goals;
- copies of public filings or releases made by the Diocese/Institution, including the most recent official registry documents, annual reports, and annual filings with the applicable government, as available;
- information regarding the internal controls and accounting procedures of the Diocese/Institution;
- certification that the Diocese/Institution has conducted a background check of all of its board members, employees, and independent contractors and has confirmed that they have no affiliation with any terrorist organizations; and
- names of financial institutions used by the Diocese/Institution.

**Diocese and Institution Screening:** AFEDJ will conduct basic screening of the Diocese and the Institutions. This screening may include, as deemed appropriate by AFEDJ's Executive Director, in consultation with the Governance Committee to the extent such person deems advisable, the following:

- conducting a reasonable search of publicly available information (e.g., appropriate internet searches) to determine whether or not the Diocese/Institution is suspected of activities relating to terrorism, including terrorist financing or support;
- use of an industry standard auto-screening service to compare the information gathered against the lists of prohibited parties as issued by appropriate national governments and international bodies (including *Specially Designated Nationals* lists maintained by the Office of Foreign Assets Control of the US Treasury (OFAC) (<https://ofac.treasury.gov/specially-designated-nationals-and-blocked-persons-list-sdn-human-readable-lists>) and the Foreign Terrorist Organization List (FTO) (<https://www.state.gov/foreign-terrorist-organizations/>) and Terrorist Exclusion List (TEL) ([https://www.state.gov/terrorist-exclusion-list/#:~:text=Section%20411%20of%20the%20USA,List%20\(TEL\)%E2%80%9D%20authority](https://www.state.gov/terrorist-exclusion-list/#:~:text=Section%20411%20of%20the%20USA,List%20(TEL)%E2%80%9D%20authority)) maintained by the US Secretary of State);
- obtaining periodic reports from the Diocese/Institution on their operational activities and their use of funds obtained from AFEDJ; and
- performing periodic on-site audits of the Diocese/Institution to the extent possible and warranted under the circumstances.

**Trustee and Staff Screening:** AFEDJ will conduct basic screening of prospective and current trustees and staff members. This screening will include the following:

- conducting a reasonable search of publicly available information (e.g., appropriate internet searches) to determine whether or not the trustee/staff member is suspected of activities relating to terrorism, including terrorist financing or support; and
- confirming that none of AFEDJ's trustees/staff members have been sanctioned by OFAC or listed on TEL.

**Trustee and Staff Training:** AFEDJ will periodically educate its trustees and staff members on expected governance practices, including the requirements of this Policy.

**Enforcement:** The AFEDJ Board of Trustees (the "Board") shall be responsible for overseeing the enforcement of this Policy. Should there be a violation of this Policy, verified as accurate (per instructions on the OFAC website), the AFEDJ staff shall immediately inform the Board. The Board may take any one or more actions in the circumstances of a verified violation of this Policy, including but not limited to:

- withdrawing and/or recovering funds furnished to the Diocese/Institution;
- contacting the Diocese/Institution and conditioning further AFEDJ funding on meeting certain specific compliance requirements;
- terminating/annulling an employment agreement, board membership, or service contract;
- reporting the incident as may be required (e.g., to OFAC).

Approved:     April 12, 2024