Division:	Fellowship Engagement	Ref. No.	POL-3151
Department:	RACS Global Health		
Title:	Counter Terrorism Finance and Anti -Money Laundering		

PURPOSE

The Royal Australasian College of Surgeon's (RACS) recognises that terrorism threatens poverty reduction and stability in the Asia-Pacific region and impacts on Australia's security and prosperity. RACS recognises the risks associated with conducting the Global Health Program in countries across the Asia-Pacific region, and that it may be vulnerable to misuse by individuals or other organisations to finance or support terrorist activity.

This policy is intended to promote the awareness and prevention of support being provided to terrorism and money laundering through the Global Health Program. RACS seeks to prevent, detect and deter the deliberate or unknowing facilitation or support of terrorist groups or organisations, or individuals associated with terrorism and/or organisational crime. The current practices, risk assessments and financial safeguards described in this policy are designed to minimise such risks.

RACS acknowledges its obligations under both Australian laws and the laws in other countries in which it operates, and is committed to ensuring that the people within scope of this policy are aware of their obligations and that there are sound procedures in place to minimse the risk of support for individuals and organisations associated with terrorism or money laundering.

2. SCOPE

The prevention and awareness of counter-terrorism financing and anti-money laundering is the responsibility of all people who contribute to RACS Global Health activities, including:

- x Council Members;
- x staff;
- x volunteers
- x consultants;
- x program partners; and
- x suppliers.

3. DEFINITIONS

The following terms used throughout this policy are defined as follows:

All reasonable efforts refers to the need for positive action and a common-sense approach, based on the level of risk, to meet legal obligations and avoid inadvertently funding terrorist activity.

Anti -Money Laundering (AML) refers to a set of laws, regulations, and procedures intended to prevent criminals from disguising illegally obtained funds to appear to have been legitimately obtained.

Counter -Terrorism refers to the measures put in place to ensure assets used or provided do not provide direct or indirect support or resources to organisations and/or individuals associated with terrorism.

Prescribed Lists refers to the lists of suspected terrorists or sut st susporism1

Authorised By: International Engagement Committee Original Issue: February 2012

D 254.96 Tm .48 0.48

Page1 of 3 Review Date: June 2026

POLICY

ROYAL AUSTRALASIAN COLLEGE OF SURGEONS

Division:	Fellowship Engagement	Ref. No.	POL-3151
Department:	RACS Global Health		
Title:	Counter Terrorism Finance and Anti -Money Laundering		

Authorised By: International Engagement Committee Original Issue: February 2012 5

Document Owner: Head of Global Health Version:

Division:	Fellowship Engagement	Ref. No.	POL-3151
Department:	RACS Global Health		
Title:	Counter Terrorism Finance and Anti -Money Laundering		

Australia or overseas) in respect of counter terrorism and anti-money laundering, as well as relevant RACS policies.

- (g) In the event that a RACS council member, staff member, consultant, volunteer or RACS partner discovers or suspects any link whatsoever with any organisation or individual associated with terrorism or money laundering, they should immediately report their concerns in writing to the Head of Global Health at global.health@surgeons.org.
- (h) With respect to RACS Global Health and other overseas engagements, RACS will continue to deploy best practices in the financing and management of resources, and will:
 - x conduct financial transactions where possible through regulated financial institutions:
 - x maintain oversight of all the Global Health Program and keep records of assistance provided to program partners and any third parties;
 - x conduct follow-up checks (including in-country reports, internal and external audits) to ensure assistance is delivered as intended and financial records are accurate;
 - x provide periodic counter-terrorism financing and anti-money laundering awareness raising and

Authorised By: International Engagement Committee Original Issue: February 2012

Document Owner: Head of Global Health Version: 5

Approval Date: June 2023

Page3 of 3 Review Date: June 2026