



THE GOOD SHEPHERD AGRICULTURAL MISSION

COUNTER TERRORISM, ANTI-MONEY LAUNDERING AND SANCTIONS POLICY

The Good Shepherd Agricultural Mission is a registered charity operating under the Societies Registration Act, 1860 in District Champawat, Uttarakhand, India.

As a registered charity, the GSAM must comply with charity law. This includes ensuring that its assets are safeguarded and properly used to meet its charitable objectives. We also have a duty to protect the funds we receive. Our resources must not be used to support criminal or terrorist purposes or in any way that breaches applicable sanctions.

This policy applies to all GSAM operations worldwide unless local legal requirements are more rigorous, or if applying the policy would be illegal under local laws.

We will assess the risks of becoming involved with terrorism and money laundering, and of breaching applicable sanctions. We will put in place proportionate measures to manage those risks, while continuing to work in difficult and challenging places.

The GSAM is committed to:

- having systems, procedures and controls in place to ensure that it manages the risk of becoming involved in financing or supporting terrorist activity, money laundering, or breaching sanctions
- for the highest risk transactions, checking that those the GSAM funds or works with are not on any lists of proscribed terrorist groups or persons, financial sanctions lists or other regulatory compliance lists
- training its staff so that they have an awareness of the risks related to terrorist activity, money laundering, and breaching sanctions
- ensuring that its staff understand their obligations to report any actual or suspected terrorist activity or money laundering
- meeting its obligations to report to external authorities.

We require all those receiving GSAM funds to act in accordance with this policy to ensure that our funds and assets are not used to finance or support terrorist activity or to launder money.

We will provide adequate and appropriate resources to implement this policy and will ensure it is communicated and understood.

The GSAM will review this policy statement annually during its Annual General Body Meeting to reflect new legal and regulatory developments and ensure good practice.

This global policy statement was approved by Warwick Shipway, Director, in March 2019 and is due for review in March 2020.