



ANTI-MONEY LAUNDERING AND COUNTER-TERRORISM POLICY

1. SCOPE OF THE POLICY

Oikos – Cooperação e Desenvolvimento bases its policies and practices on the Universal Declaration of Human Rights, the humanitarian principles of transparency, neutrality and impartiality, and other relevant international human rights legislation, promoting equality, tolerance and social justice.

Oikos' activity shares efforts and responsibilities, as well as facilitates solutions to ensure that all people enjoy the right to a dignified life, within the framework of sustainable development. Oikos recognizes the susceptibility of organizations to potential acts of money laundering, given its frequent presence in regions where there are serious difficulties in fund control and regulation.

Oikos – Cooperação e Desenvolvimento is an organization that operates in the field of development cooperation and humanitarian action, this being the sole purpose and use of funds received from various public and private institutions. All funds are intended to fulfill the mission and different strategic objectives of the organization.

Oikos recognizes that, in some of its areas of activity and countries of operation, it may be potentially vulnerable to money laundering processes, namely in processes and transactions with delegations and/or public and private institutions and entities.

2. APPLICABILITY

This policy applies to all staff members, partners, and third parties related to the organisation's activities:

- Staff members of the organisation are understood to be all members that constitute the Headquarters, including all members of the Board and different Departments, as well as the various Country Delegations where Oikos operates;
- Partners of the organisation are understood to be all entities that contractually share activities and functions in the various projects and countries where Oikos operates;
- Third parties related to the organisation's activities are understood to be volunteers, interns, donors, funders, consultants, and other national or international entities not included in the categories above.

This policy applies during and after the contracted working hours. Any activity of staff members, partners, and third parties related to the organisation's activities, outside the contracted working hours, that does not comply with this policy shall be considered a violation thereof.

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3. DEFINITIONS

Money Laundering

It is understood as all types of offences and infringements involving the proceeds of crimes or terrorist funds. These offences and infringements include possessing, handling, or concealing the proceeds of any crime or illicit activity. Likewise, money laundering has three different stages: i) placement and introduction of funds, often in cash, into financial systems; ii) layering of funds, going through a complex sequence of transactions designed to make it impossible to trace the funds back to their origin; and iii) integration of the funds into the legitimate economy in a way that is unrecognisable as the product of crime.

Terrorism

It is understood as the unlawful use of violence or intimidation against society, namely civilians, in the pursuit of political objectives. Terrorism, often interconnected with other types of illicit acts and organised crime, violates the fundamental rights of innocent and most vulnerable people, diverting money and attention away from the real needs of communities.



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4. PRINCIPLES

In order to protect the most vulnerable groups, namely vulnerable adults and children, and to ensure the integrity of the organisation, Oikos follows the following principles:

- Oikos is committed to ensuring that all agreements entered into minimise any potential risk of funds being diverted to terrorists or any other criminal purposes;
- All organisational activities comply with national and international law, ensuring that its work and that of partner organisations is free from any illicit interference and that resources are applied for their intended purpose;
- Any activity related to acts of money laundering or terrorism is strictly prohibited, regardless of the context;
- If staff members or third parties related to the organisation's activities suspect or are concerned about possible violations of the above by another staff member, they must immediately report it in accordance with the defined mechanisms and processes;
- All staff members or third parties related to the organisation's activities are obliged to create or maintain an environment that prevents any connection with money laundering or terrorist activities, as well as to promote the implementation of this policy.

5. COMMITMENTS

To ensure compliance with the principles set out, Oikos commits to:

- Not following or allowing any type of involvement with terrorist organisations;
- Not engaging with and/or financing partners whose activities advocate terrorist activities;
- Ensuring that its staff members or third parties related to the organisation's activities do not engage in or resort to money laundering processes, whether by acquiring, concealing or disguising such actions;
- Ensuring that its staff members or third parties related to the organisation's activities do not obstruct potential investigations and do not contact any person suspected of involvement in the aforementioned activities;
- Ensuring that its staff members or third parties related to the organisation's activities report acts of money laundering or terrorist activities, even when based on potential suspicions.

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- Investigate allegations of money laundering and terrorism in a professional manner, involving professional investigators and forensic experts, as appropriate;
- Take prompt and appropriate action against staff members or third parties related to the organisation's activities who engage in money laundering or terrorism, which may include disciplinary measures, namely legal action, in the country of origin and/or host country.

6. RESPONSIBILITIES

All staff members and third parties related to the organisation's activities share the obligation to prevent and respond to misconduct and potential illicit activities. It is their responsibility to follow the principles and commitments set out in this policy. All staff members and third parties related to the organisation's activities who work alongside communities must also contribute to the monitoring of this policy by taking into account the feedback of beneficiaries.

Managers, supervisors, and human resources officers must ensure that all staff members and third parties related to the organisation's activities understand and comply with this policy, being responsible for recruitment and training. In the case of managers and HR supervisors, they are also responsible for performance management in the context of preventing misconduct and potential illicit activities. Line managers are responsible for verifying and ensuring that investigation processes, reporting, and disciplinary consequences are duly carried out.

Country coordinators or representatives must ensure that vulnerable adults and children are protected from misconduct and illicit activities in projects within the country of operation. Country coordinators must ensure that the policy is culturally appropriate within the community, developing mechanisms to implement and monitor its effectiveness. This includes raising awareness among project beneficiaries, staff members, and third parties related to the organisation's activities regarding complaints about misconduct and illicit activities. Country coordinators must also ensure that complaints are properly submitted and subsequently investigated, following the necessary disciplinary measures. Country coordinators are responsible for ensuring all necessary assistance to the complainant, victim, or survivor.

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Any staff members and third parties related to the organisation's activities who consider themselves to be witnesses, victims, or survivors of misconduct or illicit activities, as set out above or in accordance with Portuguese legislation or the legislation of the country of operations, must immediately report it to their direct line manager, or, in the case of a conflict of interest, report it to the next level of management.

Any communication made with external third parties, such as donors or partners, shall be the responsibility and a decision taken by the Country Coordinators, the Director of Operations, and the Executive Director.

All incidents related to fraud and corruption, as well as harassment, sexual exploitation and abuse, or the protection of children and vulnerable people, must follow the policies specifically developed for those topics.

7. COMPLAINT

It is understood that the subject matter of this policy includes the submission of concerns regarding others and the organisation, which may involve potential risks for the institution and/or for third parties related to it.

The complaint procedure applies in all cases where there are concerns or suspicions regarding the existence of money laundering acts and/or terrorist activities within the scope of the organisation's work and activities, regardless of the location, context, or whether the information related to the event is confidential.

7.1. SUBMISSION OF A COMPLAINT

The submission of a complaint may be made by staff members, volunteers, beneficiaries, or third parties related to the organisation's activities. The submission of a complaint should contain sufficient information about the occurrence, mentioning aspects that may be potentially relevant for the investigation, such as:

- The possibility that someone is at immediate risk of being harmed;
- A detailed description of the occurrence. If possible, include dates, times, places, people, and the context in which the occurrence took place;
- Individuals potentially involved in the occurrence;
- How the occurrence subject to the complaint came to your attention.

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- At what point you began to feel concerned and considered the occurrence as a matter of concern;
- Indicate whether you discussed your concern about the occurrence with anyone else;
- State whether any response or remedial measure has already been taken following the preliminary verification of the occurrence.

The submission of consolidated evidence of the practice of any illicit activities is not required.

A complaint may be submitted informally, verbally or by telephone call, and will be handled at the local level; or formally, by email, letter, or by completing the form made available for this purpose.

Complaints are received and initially processed by local project staff directly, or by the designated communication officer, through the completion of the form. They are responsible for reporting to the Country Coordinator at the local level, or to their hierarchical superior. In all circumstances, the Director of Operations must be informed of the submission of all complaints. Where necessary, and following the analysis of each case and complaint, the involvement of the Executive Board or the Board of Directors may be requested.

All complaints received will be acknowledged, either in writing or verbally, within 3 working days of their receipt.

Oikos reserves the right to withdraw or amend the complaint submission process, as well as to act in defence of the organisation and its staff, namely in the case of malicious or false complaints.

7.2. INVESTIGATION AND FINAL DECISION

If an investigation is required, the outcome may involve disciplinary measures if misconduct is proven, which may include dismissal for just cause. The investigation must be completed within a maximum of 10 working days. If it is not possible to conclude within this period, the complainant will be notified. Oikos will always seek to ensure that the investigation is carried out in the shortest possible time.

Any internal complaint related to any of the aspects set out in this policy and that constitutes a matter of reporting must be discussed with the respective direct line manager, following the procedures for the submission of complaints established herein. In submitting complaints, the complainant(s) may bypass the hierarchical levels immediately above them whenever such levels are implicated or provide any kind of protection and/or concealment of the practice in question, or whenever there is a reasonable suspicion of conflict of interest.

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- i. This shall occur if the complainant considers that their line manager is not the appropriate person to resolve the issue that gave rise to the complaint
 - ii. This shall occur if the complainant considers that the reported misconduct was committed by the Country Coordinator or Country Representative, in which case the complaint should be addressed directly to the Director of Operations at the Headquarters of Oikos – Cooperação e Desenvolvimento in Portugal;
 - iii. This shall occur if the complainant considers that the reported misconduct was committed by the Director of the department supervising the complainant's functions, in which case the complaint should be addressed directly to the Executive Director at the Headquarters of Oikos – Cooperação e Desenvolvimento in Portugal;
 - iv. This shall occur if the complainant considers that the reported misconduct was committed by the Executive Director, in which case the complaint should be addressed directly to the Board of Directors at the Headquarters of Oikos – Cooperação e Desenvolvimento in Portugal;
 - v. If the Board of Directors at the Headquarters of Oikos does not provide sufficient guarantees of independence with regard to the Executive Director, the complaint should be addressed directly to the President of the General Assembly or to the President of the Supervisory Committee of the Organization.
- Direct contact and communication with the Oikos Project Team and Delegation in question, duly identified;
 - Contact by email with the Oikos Project Team and Delegation in question;
 - Contact through other communication channels made available by the Oikos Project Team and Delegation in question.

Upon completion of the investigation, the final decision is shared, concluding the process. The complainant is notified of the final decision of the process; however, the results may be subject to confidentiality and not publicly disclosed, in order to ensure security and protect the dignity of those involved.

If, at the end of the investigation, it is concluded that the reported occurrence constitutes a criminal or illicit activity, the matter will be referred to the competent authorities and handled in accordance with the legal requirements of each country.

8. CONFIDENTIALITY

Oikos emphasizes that, although it is possible to submit a complaint anonymously, such a situation may compromise data collection, the investigation process, and the notification of a final decision. For this reason, and whenever the complainant allows it, the process will be disclosed only to the strictly necessary group of individuals responsible for handling the investigation and the process, as provided for in this document. The entire procedure must always be conducted confidentially, ensuring the safety and well-being of the complainant, the individuals or organizations potentially affected, and any other parties involved in the complaint.

At the community level, within the various Delegations and Representations of Oikos, Oikos – Cooperação e Desenvolvimento acknowledges the specificity of each case, context, project, and country, and promotes the submission of complaints by beneficiaries and members of local teams and delegations. Any complaint arising in the course of a project must use the mechanisms provided by the project itself or made available by the organization to do so:



A Oikos – Cooperação e Desenvolvimento is a Non-Profit Association, internationally recognized as a Non-Governmental Organization for Development. We believe in a world without poverty and injustice, where human development is equitable and sustainable at both local and global levels. For this reason, we have assumed the mission of eradicating poverty and reducing inequalities so that all people may enjoy the right to a dignified life.

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