

THE DANISH
INSTITUTE FOR
HUMAN RIGHTS

ANTI-TERROR POLICY

ZERO TOLERANCE TOWARDS TERRORISM

The Danish Institute for Human Rights works in countries where people, groups or entities with terror-related aims may be present.

The institute has zero tolerance towards terrorism regarding employees, business partners, partners in programmes or projects and other parties with which we cooperate.

The institute is obligated to ensure that funds, resources and assets are not made available for, or in other ways benefit, persons, groups or entities on the UN or EU terror lists. This obligation of the institute applies in connection with partnerships, employments, business partners or other cooperation.

All employees and collaboration partners of the institute must know and accept the anti-terror policy and enforce the principle of zero tolerance towards terrorism.

IMPLEMENTATION OF THE ANTI-TERROR POLICY

Implementation of the anti-terror policy rests on three main elements:

- Prevention,
- Notification,
- Follow up and sanctions.

PREVENTIVE MEASURES

Partner contracts: All partner contracts include an anti-terror clause under which partners guarantee that they are not on the UN or EU terror lists. Moreover, partners are obligated to ensure that funds, assets or resources transferred to them are not made available to, or in other ways benefit, persons on the UN or EU terror lists, e.g. in connection with local collaboration or allocation of aid. Partners are also obligated to keep up-to-date with the terror lists.

Screening of projects and partnerships: The institute will carry out regular screenings of partnerships in connection with implementation of the Institute's projects, to ensure that partners are not on the UN or EU terror lists. As partnerships often involve transfers of funds, this screening is important to prevent unintentional financing of terror-related objectives. The screening is carried out once a year in connection with the annual partner audit by the project manager.

Screening of employees: When hiring new employees, the HR department checks whether the person in question is on the UN or EU terror lists. Screening is carried out in connection with recruitment and before entering into an employment contract. The project manager for the relevant project will be responsible for locally recruited employees.

Procurement of goods and services: In connection with the procurement of goods or services exceeding DKK 250,000, there are checks to ensure that the supplier is not on UN or EU terror lists. The institute also observes Danish and EU rules for procurement of goods and services.

UN AND EU TERROR LISTS

The UN terror list is revised at least every six months, and the updated list is available at this [link](#).¹

The EU terror list is revised by the European Council at least every six months. The updated lists for Al-Qaeda are available at this [link and for the Taliban](#) at this [link](#).²

NOTIFICATION AND FOLLOW-UP

All institute employees and partners are obligated to notify immediately their superior or contact person at the Institute, if they become aware of employees, business partners, partners in programmes or projects, or others with whom we work are listed on UN or EU terror lists. The institute will notify this to relevant donors.

¹The criteria for inclusion on the UN terror list are stated in section 2 of UN Security Council Resolution 1617 from 2005.

²The criteria for inclusion on the EU terror list are stated in article 1(2)-(4) of the joint Council opinion 2001/931/FUSP.

SANCTIONS

If there is a reasonable suspicion that funds, assets or resources have been made available to persons, groups or entities on terror lists, sanctions involve:

- Cessation of contract with the terror-listed person, group or entity
- Repayment of funds.

Any decision about sanctions must be taken by the senior management of the institute following consultation with persons and institutions relevant in the given situation, including with partners or donors.

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