Anti–Terrorism Policy

Consortium for Climate Change Ethiopia (CCC-E)

February 2026

Policy Title:	Anti-Terrorism Policy
Owner:	Consortium for Climate Change Ethiopia (CCC-E)
Version:	1.0
Date issued:	January 2026
Policy Objective:	To ensure that CCC-E resources, activities, partnerships, and operations are not used, directly or indirectly, to support or facilitate terrorism or terrorist organizations. The policy aims to establish clear measure for preventing, detecting, reporting and responding to any suspected terrorism-related risks in a timely and appropriate manner.
Other Related Policies:	Code of Conduct Policy, Conflict of Interest Policy, Anti-Fraud and Anti-Corruption Policy

I. BACKGROUND

The purpose of this Policy is to ensure that CCC-E's resources, programs, partnerships, and operations are not used, directly or indirectly, to support terrorism or terrorist-related activities. The Policy establishes clear measures to prevent, detect, and respond to any potential terrorism-related risks in an appropriate and timely manner.

This Policy applies to the CCC-E Board, all CCC-E employees, including all paid and unpaid consultants, contractors, interns, and volunteers who provide supplies, services, or support to CCC-E or promote its work at any location within or outside the country. All such parties are referred to as "employees" in this document.

This Policy also applies to CCC-E's partners, vendors, and other third parties where it is included or referenced in relevant agreements, memorandums of understanding, contracts, purchase orders, or other formal arrangements with CCC-E.

II. INTRODUCTION

CCC-E is committed to conducting its activities in a responsible, transparent, and accountable manner and to ensuring that its operations fully comply with national laws, donor requirements, and international standards aimed at preventing terrorism and the financing of terrorism.

CCC-E adopts a zero-tolerance approach to any form of support for terrorism or terrorist organizations. The organization recognizes that civil society organizations, if not properly governed, may be exposed to risks related to the misuse of funds, resources, or partnerships. Such misuse can undermine public trust, divert resources away from intended beneficiaries, and threaten the integrity and credibility of development and humanitarian efforts.

The purpose of the CCC-E Anti-Terrorism Policy is to provide clear guidance on how the organization prevents, identifies, reports, and responds to any suspected terrorism-related risks. It also clarifies the responsibilities of all CCC-E staff, Board members, partners, and associated parties in ensuring that the organization's resources, activities, and relationships are not used to support or facilitate terrorism in any form.

The CCC-E Board and Senior Management Team are committed to the effective implementation of this policy and to ensuring that appropriate systems, procedures, and training are in place so that all employees and associated parties understand their responsibilities and comply with this policy.

III. PURPOSE

The purpose of this Anti-Terrorism Policy is to ensure that the resources, programs, partnership, and operations of the Consortium for Climate Change Ethiopia (CCC-E) are not used, directly or indirectly, to support or facilitate terrorism or terrorist- related activities. This policy establishes

CCC-E's commitment to preventing any misuse of its funds, assets or organizational structure for activities related to terrorism.

IV. OBJECTIVE

The objectives of this policy are to:

- Establish clear guidelines to prevent the use of CCC-E resources in support of terrorism or terrorist organizations.
- Promote compliance with applicable national laws, donor requirements, and international standards related to counter terrorism and the prevention of terrorist financing.
- Ensure that all CCC-E staff, Board members, partners and associated parties understand their responsibilities in identifying and preventing terrorism related risks.
- \provide procedures for detecting, reporting, and responding to any suspected terrorism-related activities within CCC-E operations.
- Safeguard the integrity, credibility and accountability of CCC-Es program and partnerships.

V. SCOPE

This policy applies to all individuals and entities associated with CCC-E and covers all organizational activities, operations, and partnerships.

The Policy applies to:

- All CCC-E Board members
- All CCC-E employees
- Volunteers, interns, and temporary staff
- Consultants and contractors engaged by CCC-E
- Partner organizations working with CCC-E
- Vendors, suppliers, and service providers
- Beneficiaries of CCC-E programs, where relevant to compliance and due diligence processes

All individuals and entities covered under this Policy are expected to comply with its provisions and support CCC-E's commitment to preventing terrorism and terrorist financing.

VI. DEFINITIONS

For the purpose of this policy, the following definitions apply:

Terrorism

The use or threat of violence, intimidation, or coercion intended to influence governments or communities, or to advance political, ideological, or religious objectives through acts that cause harm, fear, or disruption.

Terrorist Organization

Any group or entity that is officially designated as a terrorist organization by national authorities or international bodies, or that engages in activities intended to plan, support, or carry out acts of terrorism.

Terrorist Financing

The provision, collection, or use of funds, assets, or resources with the intention or knowledge that they may be used to support terrorist activities or terrorist organizations.

Material Support

Any form of financial, logistical, technical, or other assistance provided to a terrorist organization or individual involved in terrorism. This may include providing funds, goods, services, training, transportation, equipment, facilities, or other resources that may directly or indirectly assist terrorist activities.

Suspicious Activity

Any activity, transaction, behavior, or circumstance that raises reasonable concern that CCC-E's funds, resources, programs, or partnerships may be used to support or facilitate terrorism or terrorist organizations.

Reporting Person

Any CCC-E staff member, Board member, volunteer, consultant, partner, or other associated individual who reports a concern, suspicion, or information related to potential terrorism or terrorism-related activities under this Policy.

VII. POLICY STATEMENT

Support for terrorism or terrorist organizations in any form will not be tolerated by the Consortium for Climate Change Ethiopia (CCC-E). Where such activity occurs, the impact is not only on CCC-E's operations and reputation but, more importantly, on the communities and beneficiaries the organization serves. Misuse of CCC-E resources for terrorism undermines trust, diverts funds from legitimate development and climate initiatives, and threatens public confidence in CCC-E, its partners, and the broader civil society sector.

CCC-E is committed to conducting, managing, and monitoring all aspects of its work in a way that prevents, detects, and responds to any potential terrorism-related risks. This includes the use

of organizational funds, assets, programs, and partnerships, which must never be diverted to support terrorist activities.

Facilitation of Terrorism

All CCC-E employees, Board members, volunteers, consultants, and partners must avoid any activity that could directly or indirectly support terrorism. This includes, but is not limited to:

- Providing funds, goods, services, or logistical support to organizations or individuals suspected of terrorist activity.
- Participating in programs or initiatives where there is reasonable suspicion that resources may be misused for terrorist purposes.
- Entering partnerships with organizations that are listed as terrorist entities or that fail CCC-E's due diligence checks.

If there is a suspicion that a request, partnership, or transaction may be linked to terrorist activity, the matter must be reported immediately through the designated reporting**.** Staff must not investigate or confront the suspected party themselves.

Payments or Resources Under Duress

In exceptional circumstances where employees or partners may be pressured to provide funds or resources under threat of harm to life, property, or organizational continuity:

- Employees must seek guidance immediately from their line manager or the designated compliance officer.
- All such incidents must be documented in detail using the official reporting procedures.
- Payments or resource allocations under duress must be minimized**,** justified in writing, and reported to senior management as soon as possible.

Partnerships, Vendors, and Third Parties

CCC-E will conduct due diligence on all partners, contractors, suppliers, and vendors to ensure compliance with anti-terrorism laws and this Policy. This includes:

- Verifying that organizations are not listed as terrorist entities by national authorities or international bodies.
- Reviewing contracts, purchase orders, and memorandums of understanding for potential misuse of resources**.**
- Monitoring the implementation of programs and use of CCC-E resources to detect suspicious activities**.**

Any partner or contractor found to be in breach of anti-terrorism requirements will face immediate suspension or termination of engagement with CCC-E.

Gifts, Hospitality, and Incentives

Staff must exercise caution when offering or receiving gifts, hospitality, or other incentives from external parties:

- Such gifts or incentives must never be intended to influence decisions or facilitate transactions that could support terrorism.
- Any offers of gifts, hospitality, or incentives must be reported and approved by a line manager or the compliance officer.

Training, Awareness, and Monitoring

CCC-E is committed to ensuring that all employees, volunteers, Board members, and partners:

- Receive training and guidance on identifying and reporting terrorism-related risks.
- Are aware of their responsibilities under this Policy and applicable laws.
- Understand the consequences of non-compliance, which may include disciplinary action, termination, or referral to legal authorities.

The Policy will be monitored and reviewed regularly to ensure that it reflects current risks, legal requirements, and international best practices**.**

VIII. LEGAL AND INSTITUTIONAL FRAMEWORK

This Anti-Terrorism Policy is developed to ensure that the Consortium for Climate Change Ethiopia (CCC-E) operates in full compliance with applicable national laws, donor requirements, and international standards related to the prevention of terrorism and the financing of terrorism.

The policy provides a framework to guide CCC-E in preventing the misuse of its resources, programs, and partnerships for activities that may support or facilitate terrorism. It also ensures that CCC-E maintains high standards of transparency, accountability, and responsible management in all its operations.

This Policy is guided by the following legal and institutional frameworks:

National Legal Framework

CCC-E is committed to complying with the laws and regulations of the Federal Democratic Republic of Ethiopia related to the prevention of terrorism and terrorist financing. These laws

establish legal obligations for organizations to ensure that their financial resources, activities, and institutional structures are not used to support terrorism or related unlawful activities.

Donor Compliance Requirements

As an organization that works with national and international partners and donors, CCC-E must comply with donor regulations and compliance requirements related to counter-terrorism and the prevention of terrorist financing. Many donor agencies require organizations to demonstrate that appropriate policies, procedures, and due diligence mechanisms are in place to ensure that project funds and resources are not diverted for terrorist purposes.

International Standards and Best Practices

This Policy also reflects internationally recognized principles and standards related to counter-terrorism and the prevention of terrorist financing. These standards emphasize transparency, accountability, risk management, and responsible governance in order to prevent the misuse of organizational resources by individuals or groups associated with terrorism.

By aligning with these national and international frameworks, CCC-E seeks to ensure that its programs and partnerships contribute positively to development and climate action while safeguarding its operations from any association with terrorism or terrorist activities.

IX. CCC-E ANTI–TERRORISM APPROACH

The Consortium for Climate Change Ethiopia (CCC-E) is committed to ensuring that its programs, partnerships, and resources are not used to support or facilitate terrorism or terrorist-related activities. To achieve this, CCC-E adopts a proactive and risk-based approach that focuses on prevention, detection, monitoring, and reporting of any potential terrorism-related risks within its operations.

This approach ensures that appropriate systems, procedures, and controls are in place to safeguard the organization's financial resources, assets, partnerships, and activities from misuse.

1. PREVENTION

CCC-E will implement preventive measures to minimize the risk that its resources, activities, or partnerships may be used to support terrorism. These measures include, but are not limited to:

Due Diligence on Partners

Before entering into partnerships, agreements, or collaborations, CCC-E will conduct appropriate due diligence to verify the legitimacy, credibility, and compliance of partner organizations. This

may include reviewing organizational registration documents, governance structures, operational history, and compliance with relevant laws and regulations.

Vetting of Staff, Consultants, and Vendors

CCC-E will take reasonable steps to verify the identity, background, and qualifications of staff members, consultants, contractors, and vendors engaged by the organization. This helps ensure that individuals and entities associated with CCC-E have no known links to terrorist organizations or activities.

Financial Controls

CCC-E will maintain strong financial management and internal control systems to ensure that funds are used only for their intended purposes. These controls include transparent budgeting, approval procedures, financial documentation, and regular financial reviews.

Risk Assessments

The organization will periodically conduct risk assessments to identify potential vulnerabilities related to terrorism and terrorist financing. These assessments will help CCC-E strengthen its internal systems and adopt mitigation measures where necessary.

2. DETECTION

CCC-E will establish mechanisms to identify and respond to any suspicious activities that may indicate potential terrorism-related risks. Detection measures may include:

Financial Irregularities

Monitoring financial transactions for unusual patterns, unexplained expenditures, or inconsistencies that may indicate misuse of funds or diversion of resources.

Suspicious Partner Behavior

Observing and evaluating the conduct of partners, vendors, and other associated parties for actions that raise concerns about compliance with this Policy or relevant laws.

Misuse of Funds or Resources

Identifying situations where CCC-E resources, assets, equipment, or program activities may be diverted or used for purposes inconsistent with the organization's mission or in violation of this Policy.

3. MONITORING AND REPORTING

CCC-E will establish systems to monitor compliance with this Policy and ensure that concerns are reported and addressed appropriately.

Monitoring activities may include periodic reviews of financial transactions, program activities, partnerships, and procurement processes to ensure that resources are used in accordance with approved plans and organizational procedures.

All CCC-E employees, Board members, partners, and associated individuals are responsible for reporting any suspected terrorism-related activities, suspicious transactions, or concerns in accordance with the reporting procedures outlined in this Policy. Reports should be made promptly and handled in a confidential and responsible manner.

The organization will take appropriate action to review, investigate, and address any reported concerns to ensure compliance with this Policy and applicable laws.

X. REPORTING AND RESPONSE MECHANISM CCC-E ANTI–TERRORISM APPROACH

CCC-E encourages all staff, Board members, partners, and associated individuals to report any suspected terrorism-related activities, suspicious transactions, or concerns related to potential misuse of the organization's resources. Prompt reporting helps CCC-E take appropriate action to prevent risks and ensure compliance with this Policy and applicable laws.

All reports will be handled seriously, confidentially, and in a manner that protects the reporting person from retaliation.

1. MONITORING AND REPORTING

Any individual who becomes aware of or suspects terrorism-related activity connected to CCC-E operations must report the concern through one of the following channels:

- Immediate Line Manager or Supervisor
- Senior Management Team
- Designated Compliance or Safeguarding Officer
- Human Resources or Administrative Office

Reports may be submitted verbally or in writing, depending on the urgency and nature of the concern. Written reports are encouraged whenever possible in order to maintain accurate documentation.

If the reporting person feels uncomfortable reporting to their immediate supervisor, they may report directly to another senior staff member or the appropriate oversight body within CCC-E.

2. DETAILED PROCEDURE FOR REPORTING

The following steps should be followed when reporting a suspected terrorism-related concern:

a. Identify the Concern-The reporting person should document any suspicious activity, transaction, or behavior that may indicate a terrorism-related risk.
b. Collect Relevant Information-Where possible, the reporting person should gather relevant details such as dates, locations, individuals involved, and any supporting documents or evidence.
c. Submit the Report-The concern should be reported through one of the designated reporting channels as soon as possible.
d. Maintain Confidentiality-The reporting person should avoid discussing the matter with others unless required as part of the reporting process to prevent misinformation or unnecessary alarm.
e. Cooperate with Follow-Up- If necessary, the reporting person may be asked to provide additional information during the review or investigation process.

3. RESPONSE TO A REPORT

Once a report is received, CCC-E will take appropriate steps to review and address the concern in a timely and responsible manner. This process may include:

Initial Review

The designated responsible authority will conduct an initial review to determine the credibility and seriousness of the reported concern.

Investigation Process

If the concern appears credible, CCC-E may initiate an internal investigation to gather facts and assess whether there has been a breach of this Policy or applicable laws.

Internal Review and Decision

Senior management will review the findings of the investigation and determine the appropriate course of action. This may include corrective measures, disciplinary action, or strengthening internal controls.

Possible Escalation

In cases where there is evidence of criminal activity or serious violations, the matter may be escalated to the appropriate legal authorities, regulatory bodies, or donors as required.

4. ENABLING REPORTS(WHISTLEBLOWING SUPPORT)

CCC-E is committed to fostering a culture of transparency and accountability where individuals feel safe to report concerns without fear of retaliation.

Individuals who report concerns in good faith will be protected from any form of intimidation, harassment, discrimination, or adverse consequences. CCC-E will make every effort to ensure that the identity of the reporting person is kept confidential, unless disclosure is required by law or necessary for investigation purposes.

Malicious or knowingly false reports made with the intention to harm others may result in disciplinary action through this mechanism, CCC-E seeks to encourage responsible reporting and ensure that all concerns related to terrorism risks are addressed promptly and effectively.

XI. ROLES AND RESPONSIBLITIES

Effective implementation of this Anti-Terrorism Policy requires the commitment and cooperation of all individuals associated with CCC-E. The following outlines the roles and responsibilities of leadership, staff, and designated entities in ensuring compliance with this Policy and preventing the misuse of CCC-E resources for terrorism-related activities.

1. LEADERSHIP TEAM RESPONSIBLITIES

The CCC-E Leadership Team, including the Board of Directors and Senior Management, is responsible for providing overall oversight and ensuring the effective implementation of this Policy across the organization.

Their responsibilities include:

- Ensuring that CCC-E operates in compliance with national laws, donor requirements, and international standards related to counter-terrorism and the prevention of terrorist financing.
- Approving and supporting the implementation of this Anti-Terrorism Policy and ensuring that it is integrated into CCC-E's governance and operational systems.
- Ensuring that appropriate internal controls, procedures, and risk management mechanisms are in place to prevent and detect terrorism-related risks.
- Promoting a culture of accountability, transparency, and ethical conduct throughout the organization.

- Ensuring that staff, Board members, and relevant stakeholders receive adequate guidance and awareness on their responsibilities under this Policy.
- Reviewing reports of suspected terrorism-related activities and ensuring appropriate action is taken when necessary.
- Ensuring that adequate resources are allocated to implement and monitor compliance with this Policy.

2. STAFF RESPONSIBLITIES

All CCC-E employees, including consultants, volunteers, and interns, have a responsibility to support the organization's commitment to preventing terrorism and terrorist financing.

Staff responsibilities include:

- Complying with the provisions of this Anti-Terrorism Policy and all related organizational policies and procedures.
- Conducting their work with integrity, transparency, and accountability at all times.
- Remaining vigilant to any suspicious activities, transactions, or behaviors that may indicate potential terrorism-related risks.
- Ensuring that CCC-E resources, including funds, equipment, and program assets, are used only for legitimate and approved purposes.
- Promptly reporting any suspected terrorism-related concerns through the appropriate reporting channels outlined in this Policy.
- Cooperating fully with any internal reviews or investigations related to reported concerns.
- Participating in relevant training or awareness activities related to compliance and risk prevention when required.

3. DESIGNATED SAFEGUARDING / COMPLIANCE ENTITY (SE) RESPONSIBLITIES

CCC-E may designate a specific officer, committee, or internal entity responsible for overseeing compliance with this Policy and managing reported concerns related to terrorism risks.

The responsibilities of the designated Safeguarding or Compliance Entity may include:

- Serving as the focal point for receiving and documenting reports of suspected terrorism-related activities.
- Conducting initial assessments of reported concerns and determining appropriate follow-up actions.
- Coordinating internal reviews or investigations when necessary.

- Ensuring that all reports are handled confidentially and in accordance with organizational procedures.
- Providing guidance and support to staff and partners on compliance with this Policy.
- Monitoring the implementation of preventive measures and internal controls designed to mitigate terrorism-related risks.
- Reporting significant concerns or incidents to senior management or the Board where appropriate.
- Recommending improvements to policies, procedures, and risk management practices based on identified risks or lessons learned.

XII. NON COMPLIANCE AND CONSEQUENCES

CCC-E takes any violation of this Anti-Terrorism Policy seriously. Failure to comply with the provisions of this Policy may expose the organization to legal, financial, and reputational risks and may also undermine the trust of donors, partners, and beneficiaries.

Any individual associated with CCC-E who is found to have violated this Policy will be subject to appropriate disciplinary action and, where applicable, legal consequences in accordance with national laws and organizational procedures.

1. CONSEQUENCE FOR VIOLATION

Any employee, Board member, consultant, volunteer, partner, or other associated individual who violates this Policy may face one or more of the following actions, depending on the severity of the violation:

- Verbal or written warnings
- Disciplinary action in accordance with CCC-E human resource policies
- Suspension of duties or termination of employment or contractual agreements
- Termination of partnerships, contracts, or collaboration agreements
- Reporting the matter to relevant legal or regulatory authorities where required

CCC-E reserves the right to take any additional corrective measures necessary to protect the organization and ensure compliance with applicable laws and regulations.

2. MALICIOUS ALLEGATIONS

CCC-E encourages individuals to report concerns related to suspected terrorism or misuse of resources in good faith. However, any person who knowingly makes a false, malicious, or misleading report with the intention of harming another individual or damaging the reputation of CCC-E may be subject to disciplinary action.

Such actions may include internal disciplinary measures or other appropriate consequences in accordance with organizational policies.

3. REPRISAL / RETALIATION

CCC-E is committed to ensuring that individuals who report concerns in good faith are protected from retaliation, intimidation, harassment, or discrimination.

Any form of retaliation against a reporting person will not be tolerated. Individuals who engage in retaliatory actions against a reporting person may face disciplinary action in accordance with CCC-E policies.

CCC-E will take reasonable measures to protect the identity and safety of individuals who report concerns, where possible and appropriate.

XIII. ASSOCIATED POLICIES AND PROCEDURES

This Anti-Terrorism Policy should be read in conjunction with other relevant policies and procedures of the Consortium for Climate Change Ethiopia (CCC-E), which together support the organization's commitment to transparency, accountability, and responsible governance.

The following policies are particularly related to and complement this Policy:

- Consortium for Climate Change Ethiopia Code of Conduct
- Consortium for Climate Change Ethiopia Conflict of Interest Policy
- Consortium for Climate Change Ethiopia Anti-Fraud and Anti-Corruption Policy
- Consortium for Climate Change Ethiopia Child Safeguarding Policy