



Kollel Chibas Yerushalayim Charity Ltd
ABN 38 632 381 527

POLICY FOR THE DISTRIBUTION OF FUNDS OVERSEAS
AND PROTECTION AGAINST TERRORISM FINANCING

Kollel Chibas Yerushalayim Charity Ltd (**KCY**) may make payments to companies, businesses or individuals that are based overseas (**Overseas Entities**) in accordance with KCY's objects, or who assist in achieving KCY's objects and activities.

To ensure that funds are used only for the purposes intended and not for any harmful or criminal activity such as terrorism, KCY will only make payments to Overseas Entities if:

1. the directors of KCY have conducted due diligence in relation to the Overseas Entity, and have verified the identities of the persons who will be responsible for the use of the funds;
2. the Overseas Entity has entered into a binding fundraising agreement with KCY, where appropriate;
3. the funds are transferred overseas by electronic funds transfer, with a reference to the stated purpose of the funds and an accompanying cover letter confirming their purpose;
4. the recipient of the funds provides:
 - (a) a written undertaking that the funds will be used exclusively for the stated purpose; and
 - (b) evidence of use of funds, for example by way of project updates, expense reports, invoices or accounts;
5. where funds are distributed overseas to pay for third party services, the service provider must provide KCY with an invoice and receipt for payment; and
6. KCY will employ its best endeavours to ensure that funds are not distributed either directly or indirectly to terrorist organisations, in contravention of the *Criminal Code Act 1995* (Cth).

To this effect, KCY will take the following steps in relation to each of the projects that it funds:

- (a) from time to time, review the list of terrorist organisations provided on the Australian National Security website to check that overseas partners are not listed;
- (b) ensure that KCY knows the recipient of the funds and conducts extensive due diligence in relation to any project it intends to fund; and
- (c) educate all of KCY's responsible people in relation to risk management and control of funds as set out in this policy.