

DTDA's Anti-Terrorism Policy

1 Policy statement

The Danish Trade Union Development Agency (DTDA) has zero tolerance towards terrorism and all forms of financial or in-kind contributions to, or other types of support towards, terrorist activities, whether involving employees, partners, external resource persons, suppliers or any other entity or individual with whom DTDA collaborates.

DTDA shall ensure and document that all reasonable steps are taken, including by our partners and other relevant parties, to secure that no transaction made in relation to DTDA's funding will benefit – directly or indirectly – a person, group or entity subject to restrictive measures/sanctions imposed by the [EU](#) or the [UN Security Council](#).

DTDA shall ensure that all persons, organisations and companies with whom collaboration is established are made aware of this policy and accepts their responsibilities hereunder. DTDA shall further ensure that adequate preventive and remedial measures are in place to enforce the policy, and that ongoing monitoring of the application of the policy is carried out.

2 Preventive measures

2.1 Due diligence, screening and capacity building

DTDA shall, without exception, perform due diligence in connection with the recruitment of staff, selection of partners and sourcing of external resource persons and major suppliers. As an integral and compulsory part of all due diligence processes, DTDA shall undertake screening in order to ensure and document that no person, organisation or company with whom collaboration is intended appears on the lists of restrictive measures/sanctions imposed by the EU or the UN Security Council. Furthermore, DTDA shall, on an annual basis, repeat the screening of all persons and entities with whom collaboration is taking place. The screening must be carried out in accordance with the instructions in the applicable DTDA guidelines.

In connection with DTDA's partner selection processes, a formal partnership assessment must always be conducted as part of the due diligence and in accordance with the instructions in the applicable DTDA guidelines. Depending on the outcome of each partnership assessment, DTDA shall, as necessary, ensure that adequate capacity building is carried out with an eye to preventing intentional or unintentional financing of any person, organisation or company subject to restrictive measures/sanctions imposed by the EU or the UN Security Council.

The requirement for partners to carry their own due diligence, including screening of sub-grantees and other relevant parties, and the respective roles and responsibilities pertaining hereto, shall be clearly stipulated in all DTDA partnership agreements.

2.2 Use of compulsory provision in contracts and agreements

All DTDA partner agreements and all contracts with external resource persons and major suppliers involving funding from the Danish Ministry of Foreign Affairs must include the following

provision (verbatim):

“Denmark/The Parties are firmly committed to ensure that any activity under this Agreement is in full compliance with United Nations (UN) Security Council Sanctions and European Union (EU) Restrictive Measures. Moreover, consistent with UN Security Council Resolutions relating to terrorism, including but not limited to, UNSC Resolution 1373 (2001), 1267 (1999), 2462 (2019), and EU autonomous measures to combat terrorism, the Parties are firmly committed to the international fight against terrorism, and in particular, against the financing of terrorism.

Accordingly, the Implementing Partner agrees that it and/or its implementing partners (including contractors, sub-contractors and sub-grantees) will take all reasonable steps to secure that no funds in relation to the Project/Programme will – directly or indirectly – benefit persons, groups or entities associated with terrorism or subject to UN Sanctions or EU restrictive measures.

If, during the course of implementation of this Project/Programme, the Implementing Partner discovers that any funds in relation to the Project/Programme have been made available to, or for the benefit of, persons, groups or entities associated with terrorism or subject to UN Sanctions or EU Restrictive Measures, it must inform the Danish MoFA immediately. The Implementing Partner and the MoFA shall promptly consult each other with a view to jointly determining remedial measures in accordance with their respective applicable legal framework. Such measures may include, but shall not be limited to, the reallocation of the remaining MoFA funds under the Agreement.

Any violation of this clause is ground for immediate termination of the cooperation returning to the Danish MoFA all funds advanced to the Implementing Partner under it.”

2.3 Ensuring policy awareness and application

Whenever an employee or external resource person signs a contract with DTDA, that person will automatically be made aware of, and must commit to, the present policy, as it constitutes an integral and compulsory part of all individual contracts. Furthermore, all employees and external resource persons must sign onto DTDA’s Code of Conduct, which includes a specific provision on anti-terror and makes explicit reference to the present policy. In addition, DTDA shall ensure that staff awareness about this policy is being kept up, e.g. in connection with staff conferences.

Equally, DTDA’s partners will be made aware of, and must commit to, the present policy, as it constitutes an integral and compulsory part of all partner agreements, as does the anti-terror provision cited in section 2.2 above. DTDA shall routinely ensure that all partners are aware of the policy, e.g. in connection with financial monitoring visits, and that they make sure to cascade the requirements herein to their respective sub-grantees and other relevant parties, as applicable.

All major suppliers will similarly be made aware of this policy and must confirm their compliance herewith whenever they enter into contracts with DTDA.

3 Remedial measures

3.1 Compulsory reporting

All employees, consultants, partners or companies who have signed a contract or agreement with DTDA are obliged to report immediately to their supervisor (in the case of DTDA employees) or to their contact person in DTDA (in the case of non-employees) if they discover that a given DTDA staff member, or a given person or organisation with whom DTDA collaborates, has been added to the list of restrictive measures/sanctions imposed by the EU or the UN Security Council.

The same thing applies if they discover – or if they have substantiated suspicion – that a given DTDA staff member, or a given person or organisation with whom DTDA collaborates, has been making financial or in-kind contributions to, or otherwise actively supported, a person or group appearing on the mentioned lists of restrictive measures/sanctions.

If reporting to the relevant DTDA supervisor or contact person is not possible because the reporting concerns that same person, the matter should be raised with the DTDA Director. If reporting to the DTDA Director is not possible because the reporting concerns that same Director, the matter should be reported to DTDA's Chairman of the Board whose contact details can be found on [DTDA's website](#).

Alternatively, reporting can be made by use of DTDA's whistleblowing/complaint mechanism which can be found [here](#) on DTDA's website, or by writing directly to: complaint@dtda.dk. The whistleblowing/complaint mechanism is handled by DTDA's Compliance & Management Coordinator who is instructed to report directly to DTDA's Chairman of the Board if the received report implicates the DTDA Director.

All reports will be handled with confidentiality, and no organisation or person reporting in good faith will be subjected to any kind of reprisals for submitting information pertaining to this policy.

If DTDA should receive an anonymous report, this will be treated with the same degree of seriousness as a report submitted by an identifiable sender. However, the person submitting the report should be aware that anonymous reports are much harder to investigate and less likely to lead to actionable conclusions.

Any reports involving managerial staff of the DTDA shall be brought to the attention of the DTDA Chairman of the Board.

The overall responsibility of ensuring reporting to the Danish Ministry of Foreign Affairs or other donors or authorities, as applicable, lies with the DTDA Director – or with DTDA's Chairman of the Board if the reporting concerns the former party.

3.2 Follow-up actions

Screening procedures shall ensure that no DTDA contract or agreement will ever be signed with an individual or a group appearing on the lists of restrictive measures/sanctions imposed by the

EU and the UN Security Council. However, if it is detected at any point that a person or organisation with whom DTDA collaborates has *subsequently* been added to the said list of restrictive measures/sanctions, the collaboration with that person or organisation shall be terminated immediately, any outstanding disbursements or payments shall be cancelled, and all funds and assets shall be retrieved to the fullest extent possible.

If DTDA acquires *suspicion* that a person or organisation with whom collaboration is taking place is making financial contributions to, or otherwise actively supports, a designated individual or group appearing on the EU/UN lists of restrictive measures/sanctions, the collaboration with the given person or organisation shall be immediately suspended and all pending disbursements or payments shall be withheld until a conclusive investigation has been carried out.

If, at any point, it is *confirmed* by DTDA that a person or organisation with whom collaboration is taking place has been making financial contributions to, or otherwise actively supported, a designated individual or group appearing on the EU/UN lists of restrictive measures/sanctions, the collaboration with that person or organisation shall be terminated immediately, any outstanding disbursements or payments shall be cancelled, and all funds and assets shall be retrieved to the fullest extent possible.

The responsibility of notifying the Danish Ministry of Foreign Affairs or other donors, as applicable, about suspensions or terminations of contracts/agreements and other possible follow-up actions lies with the Director of DTDA.

4 Monitoring

DTDA shall ensure periodic monitoring of the application of this policy at all relevant levels, including through financial monitoring visits and partner meetings.