



Title:	Financial Sanctions, Anti-Terrorism and anti-money laundering policy
Policy statement:	<p>DSPR is committed to ensuring its resources are used solely to further its mandate.</p> <p>Therefore, DSPR will take all reasonable steps to ensure that:</p> <ul style="list-style-type: none"> - None of its funds or property are made available to parties that are subject to financial sanctions or are otherwise proscribed by the United Nations or World Bank, or by governmental bodies - None of its funds, resources or property are used for purposes of terrorist activities - None of its funds are connected with money laundering <p>To this end, DSPR will:</p> <ul style="list-style-type: none"> - Perform due diligence to be confident regarding the sources of its funds - Ensure relevant staff and local partners are trained and supported, to be aware of risks and to comply with DSPR's policies and procedures. - Report any suspected breaches of legislation and sanctions using DSPR report procedures and notify donors of any suspected breaches that involve their funds or resources <p>All DSPR staff, consultants and volunteers are committed to deal with the terrorism lists approved by the UN and or donor countries of DSPR.</p> <p>The Department of Service to Palestinian Refugees (DSPR) reaffirms its commitment to protecting the dignity of its beneficiaries and categorically rejects any vetting or security screening of individuals benefiting from its services, programs and projects. Such practices are considered contrary to fundamental humanitarian principles and constitute a violation of the beneficiaries' privacy and rights. The DSPR agrees, when necessary, to conduct vetting related to members of its Board of Directors and senior staff, in accordance with local laws and best institutional practices, without compromising the DSPR's independence or imposing conditions that undermine its core principles.</p>
Procedures:	<p>Procedures of this policy revolve around two main components: the first is identifying and verifying any stakeholder before entering into a business relationship with DSPR and the second is ensure employees understand their responsibilities under this policy through training and awareness. For more details, see Annex 1: procedures and steps of Financial Sanctions, AT and AML policy; Annex 2: Awareness Materials for Training and Orientation.</p>



Definitions:	<p>Financial sanctions: Financial sanctions are imposed by governmental bodies. They take different forms, including:</p> <ul style="list-style-type: none"> - asset freezes which restrict access to funds and economic resources - restrictions on various financial markets and activities in certain countries - directions to cease business of a specified type - directions to cease all business with certain sanctioned individuals or organizations. <p>Money Laundering: is the process of making illegally-gained proceeds appear legal. NGOs / CROs can be targets for money laundering if criminals believe they can put money into the NGOs / CROs and get it back out again. This could be through refunds, loan repayments, or payments to an organization or people with criminal controls.</p> <p>Terrorist attacks: an act that endangers or causes serious violence to a person/people; causes serious damage to property, or seriously interferes or disrupts an electronic system.</p>
Related Policies & Procedures:	<ul style="list-style-type: none"> - Code of conduct - Whistleblowing - Conditional funding policy
Why is the policy needed:	<p>Legal, regulatory and donor requirements</p>
Who must follow this policy:	<p>This policy applies to all staff and associates.</p> <p>Staff includes:</p> <ul style="list-style-type: none"> ● all staff, national and international ● all volunteers and interns <p>Associates includes:</p> <ul style="list-style-type: none"> ● all contractors, e.g., consultants, vendors, etc. ● all Board Members ● all partners including local community-based partners ● Guests and Visitors



Next formal review:	Next review and approval date within 3 years of the above date or sooner if legislation, best practice or other circumstances indicate that it is necessary; May 2028
Person responsible:	DSPR Executive Director AC Executive Directors
Version:	11 June 2025
Approved by:	Central Committee Members: Dr. Audeh Butros Audeh Quawas; Chairperson-Member at Large- Representing Orthodox Church Family Mr. Bassem Issa Audeh Thabet Vice- Chair- Delegate DSPR-ICC Jerusalem & WB Area Committee Dr. Farah Atallah Farah Attallah; Treasurer- Delegate DSPR-NECC Jordan Area Committee Bishop Sani Ibrahim Charly Azar; Member at Large- Representing Episcopal – Lutheran Church Family Mrs. Sandra Tawfiq Habesch Khoury; Member at Large- Representing Catholic Church Family Dr. Jean Salaminian; Member at Large- Representing Eastern Orthodox Church Family Mr. George Jamal Jamil Antone; Delegate DSPR-NECC Gaza Area Committee Mr. Adel Nasser; Delegate DSPR-ICCI Galilee Area Committee MS. Nina Farah Shaddad; Delegate DSPR-JCC Lebanon Area Committee
Approval date:	Central committee meeting: 4 July 2025



Annex 1: procedures and steps of Financial Sanctions, AT and AML policy

Ensuring that any stakeholder to be screened by DSPR (undergoing any contractual relationship with any constituency

- Comply with partner's standards in screening vendors as per the DSPR's conditional funding policy

Transaction Monitoring for detecting suspicious activities or transactions through:

- Monitor transactions for unusual patterns, large cash deposits etc
- Flag and review transactions that exceed involve high-risks

Suspicious Activity Reporting (SAR) through

- Report any suspicious activity internally
- Maintain records of all internal and external reports
- Ensure confidentiality of SARs and avoid tipping off the subject of a report.

Internal Controls and Audit to ensure the effectiveness and integrity of the AML/CFT and sanctions compliance program through

- Establishing clear roles and responsibilities for the implementation of this policy in each area.
- Conduct regular internal audits and reviews global related procedures.
- Update policies and controls based on audit findings.
- Report results of audits to senior management and CC as applicable.



Annex 2: Awareness Materials for Training and Orientation to ensure employees understand their role and responsibilities under this policy.