

3F International's Anti-Terrorism Policy

Introduction

United Federation of Danish Workers (3F) has zero tolerance with regard to terrorism. This policy applies unconditionally to 3F International as well as to all partners, contractors, subcontractors, sub-grantees, and any other entities with which/whom the 3F cooperates.

3F International shall ensure that no financial, material, or other resources related to the SPA program are, whether directly or indirectly, made available to individuals, entities, or groups included on the EU terrorist list ([link](#)), are subject to EU restrictive measures ([link](#)), or designated under United Nations sanctions lists ([link](#)). Furthermore, 3F International shall ensure that all partner organisations are duly informed of the existence of this anti-terrorism policy, and that they formally acknowledge and accept its binding implications.

This policy contains preventive measures as well as follow-up measures.

Prevention

Employees and External Resource Persons

As an integral component of the recruitment and engagement process for staff members and external resource persons, 3F shall conduct verification procedures to ascertain that no candidate appears on the EU terrorist list, the UN sanctions lists, or are subject to EU restrictive measures.

The responsibility for such verification shall rest with the Head of 3F International and, with respect to local employment, the Regional Coordinator/Head of the Regional Office.

Partner organisations

Prior to the establishment of any form of cooperation with partner organisations, 3F shall ensure that the organisations do not appear on the EU terrorist list, are not subject to EU restrictive measures, and are not included on the UN sanctions lists. Any organisation appearing on such lists shall be excluded from cooperation.

All partner organisations shall be explicitly informed when cooperation is financed by the Danish Ministry of Foreign Affairs (DANIDA). Furthermore, the partnership contract shall include a binding provision stipulating that the implementing partner confirms that it and/or any implementing partners under its responsibility (including contractors, subcontractors, and sub-grantees) shall take all reasonable and necessary measures to ensure that no transaction undertaken in connection with the project or programme shall—whether directly or indirectly—benefit any individual, group, or entity associated with terrorism, or included on the EU terrorist list, the UN sanctions lists, or subject to EU restrictive measures. Non-compliance with this provision shall constitute grounds for immediate termination of the agreement.

In addition, the contract shall impose an obligation to report any actual or suspected linkages with individuals or organisations associated with terrorism without delay. The Regional Coordinators and Head of 3F International will follow up and address these provisions and address the matter on at least an annual basis during the mandatory partner meetings.

The follow statement will be included in all partner contracts:

“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.”

Notification and follow-up actions

Notification

All employees, as well as partner organisations, shall be under an immediate and binding obligation to notify their direct supervisor or designated 3F contact person in the event that they become aware of any person or entity working in, for, or with 3F who is included on the EU terrorist list, is subject to EU restrictive measures, or appears on UN sanctions lists.

The responsibility of further reporting to the Ministry of Foreign Affairs lies with the Head Office management.

Whistleblower and complaint mechanism

Suspicion of breach of this policy can be reported to 3F International whistleblower and complaint mechanism by staff, partners, their staff, and any third party.

Follow-up actions

In circumstances where there is reasonable suspicion that funds, resources, or assets have been made available to any person, entity, or group appearing on the EU terrorist list, the UN sanctions lists or are subject to EU restrictive measures, 3F shall, without delay, initiate the following measures:

- Immediate termination of the relevant contract;
- Recovery and repayment of disbursed funds;
- Permanent exclusion of the entity concerned from any future cooperation with 3F.

Responsibility for implementing and enforcing such measures shall rest with 3F International's management.