



## Room to Read Policy

**Policy Name:** ANTI-TERRORISM POLICY

**Policy Owner:** Chief Financial Officer

**Revision Date:** July 2018

**Policy Number:** 205WW

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### ***Purpose:***

The U.S. and other countries and quasi-government entities prohibit doing business with individuals, states and entities who are or who are believed to be involved in terrorism or are otherwise deemed a threat to global security. Room to Read is committed to ensuring that it does not do business with any individual or entity who is identified as involved in terrorism by any relevant jurisdiction.

### ***Applicability:***

This Anti-Terrorism Policy ("Policy") applies to Room to Read worldwide.

### ***Policy:***

It is Room to Read's policy to not do business with any entity or individual identified by the U.S. Government (through the Office of Foreign Assets Control (OFAC)), the United Nations, the World Bank, or other relevant jurisdiction as involved in terrorism or a threat to global security. Room to Read will enact procedures to enact this Anti-Terrorism Policy. Those Procedures will include vetting employees, vendors, partners and key donors through a commercial vetting service.

### ***Procedure and Relevant Resources:***

To ensure compliance, Room to Read will adopt Vetting Procedures to implement this Anti-Terrorism Policy. Those Vetting Procedures will include:

- Vetting Room to Read employees; implementing partners, including key employees and leadership; vendors, including leadership and owners; and key donors through a commercial vetting mechanism;
- Vetting shall occur *prior* to conducting any business, and on a regular basis, typically every quarter, thereafter;
- In the event that vetting results in a positive "hit" for an individual or entity, no business, or further business shall be conducted with that individual or entity prior to receiving clearance from the Legal Department.

### ***Training:***

All GO and CO management, employees involved in procurement, and employees tasked with performing the Vetting Procedures will receive training on Room to Read's Anti-Terrorism Policy. Designated employees tasked with the Vetting Procedures or otherwise involved in the vetting process will receive periodic training on this Anti-Terrorism Policy and the Vetting Procedures.

### ***Consequences for Violations:***

Violations of this Anti-Terrorism Policy and the Vetting Procedures may result in disciplinary action, up to and including termination.

### ***Definition:***

Office of Foreign Asset Control (OFAC), a part of the U.S. Treasury Department, is the office charged with maintaining a list (called the “Specially Designated Nationals” list (SDN)) of foreign states, entities and individuals who are involved in or financially support terrorism. U.S. individuals and organizations, including Room to Read, are prohibited from doing any business with individuals identified by OFAC as being involved in terrorism.

***Contact Department:***

All questions regarding this policy should be directed to the Director, Legal Operations.

RELATED POLICIES

Procurement Policies

Suspension and Debarment Policy

Vetting Procedures