

COUNTER-TERRORISM POLICY

NIRAS-LTS International (hereafter NIRAS-LTS) recognises that there may be a risk of funds managed by NIRAS-LTS staff, contractors and partners being diverted to finance or support terrorist activities. This policy outlines the due diligence process that is in place to ensure that funding managed by NIRAS-LTS is not linked to terrorist offences, terrorist activities or financing.

NIRAS-LTS views counter terrorism (CT) as an internal control and risk management issue to be managed alongside measures to prevent fraud, bribery and corruption which are covered under our Anti-Bribery and Corruption Policy; and other criminal or unethical behaviour covered under our Core Values and Ethics Policy (all NIRAS-LTS Policies can be accessed on our website at <https://www.ltsi.co.uk/about-us/our-policies/lts-policies>).

1 Responsibilities

Delivery chain partners contracted by NIRAS-LTS are required to undertake similar counter terrorism due diligence on any staff or subcontractors linked to an LTS contract, prior to their engagement on the contract and must immediately declare any instances or allegations of terrorist activities or unethical behaviour by an existing or potential staff member or subcontractor to NIRAS-LTS. For DFID programmes they may also contact the DFID Counter fraud and Whistleblowing Unit (CFWU) at reportingconcerns@dfid.gov.uk or on +44(0)1355 843747.

1.1 Process

Prior to contracting, NIRAS-LTS will conduct a counter terrorism due diligence process for all staff and individual sub-contractors, to ensure the staff/sub-contractor does not appear on counter-terrorism lists using the following three step process:

1. Search for the individual's name on the Consolidated List of Financial Sanctions Targets in the UK published by HM Treasury and Office of Financial Sanctions Implementation¹.
2. Search for the individual's name on the Council of the European Union's terrorist list of persons and organisations subject to sanctions².
3. Conduct a search of the worldwide web using the individual's name and the following keywords: 'terrorism', 'terrorist'³.

This process is carried out alongside other pre-employment screening checks for staff, and reference checking for sub-contractors.

1.2 Making a disclosure

Staff members who have a complaint or concern relating to suspected terrorist activities should report it immediately to their NIRAS-LTS manager who will inform the Managing Director.

If that person fails to take action, you are not satisfied with the action they take, or they are the person committing the act being reported, then you should contact the Managing Director at Paddy-Abbot@ltsi.co.uk.

Employees working on DFID Contracts, can immediately report all suspicions or allegations of aid diversion, fraud, money laundering or counter terrorism finance

¹https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/862892/Terrorism_and_Terrorist_Financing.pdf

² <https://eur-lex.europa.eu/legal-content/en/TXT/HTML/?uri=CELEX:32019D1341&from=en>

³ Note that this search is conducted alongside searches for keywords 'criminal'; 'illegal'; 'fraud'; 'corruption'; 'abuse'; 'trafficking', covered under the Anti-Bribery and Corruption Policy and Core Values and Ethics Policy.

to the DFID Counter Fraud and Whistleblowing Unit (CFWU) at
reportingconcerns@dfid.gov.uk or on +44(0)1355 843747.

Patrick Abbot

Managing Director, NIRAS-LTS International

5th November 2020