**HealthProm Board statement on sanctions policy. 8 August 2022**

At its meeting on 7 July 2022 the Board of HealthProm (HP) reviewed its approach to compliance on sanctions.

The Board noted that under OFSI's 2 Feb 2022 guidance: Financial Sanctions for Charities Operating in High-Risk Areas, HealthProm's operations include activities which are designated 'High Risk' ('Operating directly in regime or opposition held areas', 'Using local NGOs as implementing partners') and 'Medium Risk' ('Utilising Hawaladars, cash couriers or MSBs to transfer funds to implementing partners').

The Board has agreed the following sanctions policy which will guide our compliance activities and will be published on our website and in our Annual Reports.

We intend to adopt a proportionate, risk-based approach to compliance, recognising the shifting international context but noting the significant administrative resource constraints under which HP operates and our long-standing relationships with, and in-depth knowledge of the majority of our donors and implementing partners. Compliance checks will be conducted on an annual basis by reviewing OFSI's consolidated list of sanctioned entities/individuals, as well as databases of sanctions screening watchlists maintained by commercial organisations; and on an ad hoc, as-required basis in the event of new relationships.

HealthProm is determined that all its funds and resources should only be used to further its mission and shall not be subject to illicit use\* by any third party, nor used or abused for any illicit purpose. In order to achieve this objective, HealthProm will not knowingly or recklessly provide funds, economic goods or material support to any entity or individual sanctioned by the international community or affiliated domestic governments and will take all reasonable steps to safeguard and protect its assets from such illicit use and to comply with host government laws. HealthProm respects its contracts with its donors and puts in place proportionate, risk-based procedures for compliance with these contracts.

These arrangements are part of a wider set of governance and financial policies agreed and regularly reviewed by the Board of HealthProm. These include:

* Anti-fraud and bribery policy (including anti-money laundering)
* Financial policies and procedures
* Value for money policy
* Central risk register

Safeguarding policies (ethics and code of conduct, child protection, vulnerable adults and whistleblowing) and those designed to support the working environment (privacy, equal opportunities, data protection and health and safety) are already set out on the HealthProm’s website.

\*"Illicit use" refers to terrorist financing, sanctions, money-laundering and export control regulations as they apply to HealthProm and its partners.