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Document title: [ **Anti-Terrorist Financing Policy** ]

Approval date: [ **October 10th , 2020** ]

Purpose of document: [ **As a U.S. educational institution, AUC also recognizes that it must comply with all applicable laws of the United States as well as the laws of Egypt, the country in which it operates** ]

Office/department responsible: [ **Office of Associate Vice President for Finance and CFO** ]

Approved by: [ **Amir Habib, Associate Vice President for Finance and CFO** ] 

Document classification level: [ **PUBLIC** ]

Document accessible: [ **<https://www.aucegypt.edu/about/university-policies>** ]

Document includes: [ **Policy** ]

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## **Anti-Terrorist Financing Policy**

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### **Policy Statement**

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The American University in Cairo ("AUC" or the "University") is committed to the principle of equal opportunity in education and employment, and in the administration of its educational, admissions, and employment policies, and other university programs and activities. AUC does not discriminate on the basis of race, color, religion, age, national or ethnic identity, gender or gender identity, marital status, disability, genetic predisposition or carrier status, alienage or citizenship status, political affiliation, or any legally protected characteristic. As a U.S. educational institution, AUC also recognizes that it must comply with all applicable laws of the United States as well as the laws of Egypt, the country in which it operates.

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### **Reason for Policy/Purpose**

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As a U.S. educational institution, AUC also recognizes that it must comply with all applicable laws of the United States as well as the laws of Egypt, the country in which it operates.

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### **Who Approved This Policy**

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**Amir Habib, Associate Vice President for Finance and CFO**

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## Who Needs to Know This Policy

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This will often include the entire AUC community, but some policies may affect only specific constituencies or sectors.

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## Web Address for this Policy

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<https://www.aucegypt.edu/about/university-policies>

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## Contacts

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Responsible University Official: Mostafa Abdel Latif

Responsible University Office: Office of the Controller

If you have any questions on the policy or procedure for [**Anti-Terrorist Financing Policy**] policy, you may:

1. Call ext. 2312
2. Send an e-mail to [mostafa@aucegypt.edu](mailto:mostafa@aucegypt.edu)

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## Definitions

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Term	Definition as it relates to this policy
"Training"	means instruction or teaching designed to impart a specific skill or skills, as opposed to general knowledge
"Expert advice or assistance"	means advice or assistance derived from scientific, technical or other specialized knowledge.

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## Policy/Procedures

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The American University in Cairo ("AUC" or the "University") is committed to the principle of equal opportunity in education and employment, and in the administration of its educational, admissions, and employment policies, and other university programs and activities. AUC does not discriminate on the basis of race, color, religion, age, national or ethnic identity, gender or gender identity, marital status, disability, genetic predisposition or carrier status, alienage or citizenship status, political affiliation, or any legally protected characteristic. As a U.S. educational institution, AUC also recognizes that it must comply with all applicable laws of the United States as well as the laws of Egypt, the country in which it operates.

AUC shall take all appropriate steps to comply with the Anti-Terrorist Financing Executive Order 13224 and Fly America Act, including:

1. Providing regular training to its relevant administrative and academic staff on compliance with applicable U.S. Federal Laws and Executive Orders. The relevant administrative and academic staff to whom such training shall be provided will include the Provost, Associate Provost, relevant deans, and any



others responsible for confirming the information set forth below:

1.1. Confirming that the following individuals and entities are not included on the Specially Designated Nationals List ("SDN List") maintained by the U.S. Office of Foreign Assets Control ("OFAC"), in advance of hiring, engagement, invitation to the University, or contract execution, as applicable:

- (i) faculty and staff,
- (ii) contractors, vendors and suppliers, and
- (iii) unenrolled individuals or entities invited to AUC to receive training or expert advice or assistance.
- (iv) Invited conference speakers

For purposes of this Policy on Compliance with the Anti-Terrorist Financing Executive Order 13224 and Fly America Act, the term "training" means instruction or teaching designed to impart a specific skill or skills, as opposed to general knowledge (including for purposes of discussion of policy), and the phrase "expert advice or assistance" means advice or assistance derived from scientific, technical or other specialized knowledge.

1.2. Not allowing any individual to receive training or expert advice or assistance at AUC to the extent that AUC is on notice that the individual is receiving the training or expert advice or assistance in his or her capacity as a member or representative of an entity included on OFAC's SDN List.

1.3. Not allowing any entity that is included on OFAC's SDN List to be included in AUC's Non-Governmental Organization ("NGO") database or any other database or tool maintained by or within the control of AUC, whose purpose, function or known effect is to put individuals in touch with NGOs or other entities.

2. Engaging an external auditor to audit AUC's compliance with its policies and procedures designed to ensure its observance of applicable laws and regulations, including the procedures described in this Policy on Compliance with the Anti-Terrorist Financing Executive Order 13224 and Fly America Act. Such audits shall be conducted on a regular basis, and not less than annually. AUC shall supplement the external audits with an audit by AUC's internal auditor at least one time annually. AUC shall take appropriate steps to address any issues that may arise from such audits.
3. Periodically reviewing and updating the University's policies and procedures relating to student, faculty and staff recruiting and employment, purchasing and procurement, grants and contracts, educational programming, and other University policies and procedures as appropriate, to reflect the foregoing.

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**Related Information**

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*American University of Beirut Policy on Compliance with the U.S. Economic Sanctions Programs*

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**History/Revision Dates**

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Origination Date: October, 2017

Last Amended Date: October, 2020

Next Review Date: October, 2021