



TUNISIAN INSTITUTE FOR PEACE AND CONFLICT STUDIES

POLICY DOCUMENT · TIPCS-POL-06

Sanctions, counter-terrorism financing and due diligence policy

Donor acceptance, sanctions screening, partner due diligence, AML/CFT controls and foreign-funding transparency – Version 1.0, 25 October 2026

TIPCS accepts money only from lawful, identified sources, received by bank transfer into its own accounts. It screens donors, partners, sub-grantees and major suppliers against UN, Tunisian, EU, US and UK sanctions lists before any commitment, rates their risk, and applies enhanced checks where risk is high. It refuses funds from states without diplomatic relations with Tunisia, funds of unknown origin and funds that would compromise its independence. It publishes and notifies all foreign funding within one month under Article 41 of Decree-Law No. 2011-88, keeps records for ten years, reports suspicion without delay, and applies these rules proportionately so that legitimate peace work is never obstructed.

TIPCS-POL-06 · Version 1.0 · 25 October 2026

Issued by the Secretary General · ratified by the Board of Directors · legally reviewed

Questions and concerns: Contact@tipcs.org · www.tipcs.org

Contents

1	Purpose
2	Scope
3	Definitions
4	Principles
5	Legal and standards basis
6	Roles and responsibilities
7	Acceptance and refusal of funds
8	Sanctions screening
9	Risk rating
10	Due diligence on partners, sub-grantees, consultants and suppliers
11	Red flags
12	Suspicious transactions and reporting to the authorities
13	Foreign funding: register, publication and notification
14	Safeguards for peace, research and humanitarian work
15	Escalation, decisions and donor notification
16	Record-keeping
17	Data protection
18	Training and awareness
19	Monitoring, audit and review
20	Breaches and sanctions
21	Relationship to other TIPCS policies
22	Glossary of abbreviations
23	Approval and version history
A	Annex A — Donor due-diligence questionnaire
B	Annex B — Partner, sub-grantee and supplier due-diligence checklist
C	Annex C — Sanctions screening record
D	Annex D — Risk-rating matrix

E Annex E — Foreign-funding register entry and notification letter (templates)

1. Purpose

This policy sets out how the Tunisian Institute for Peace and Conflict Studies (TIPCS) makes sure that the money it receives, holds and spends is lawful, that its independence is protected, and that neither its funds nor its name are used, directly or indirectly, to finance terrorism, launder money, evade sanctions or support any person or entity subject to restrictive measures that bind TIPCS or its donors.

It turns the commitments published in the short version of this policy on the TIPCS website into detailed rules, procedures, time limits and forms that staff, officers and partners can apply in practice, and that donors, auditors and the Tunisian authorities can verify.

The policy is designed to be proportionate. It protects TIPCS's peace research, training and dialogue work by concentrating effort where risk is real, rather than by avoiding communities, victims, displaced people or other groups with whom legitimate peace work must be done.

2. Scope

This policy applies to:

- all members of the Board, including the Chairperson, Vice-Chairperson, Secretary General and Treasurer;
- the executive team, all departments (including the Research department and the Academy) and all employees, interns, volunteers and consultants acting for TIPCS;
- all income: membership dues, gifts, donations and legacies, national or foreign public and private grants, and revenue from TIPCS's activities and projects;
- all outgoing funds and in-kind support: sub-grants, partner budgets, consultancy fees, supplier payments, per diems, travel support and prizes;
- all counterparties: donors, partners, sub-grantees, consultants, suppliers, co-organisers and, to the limited extent set out in section 14, participants in TIPCS activities.

Where a grant agreement imposes stricter requirements than this policy, the stricter requirement applies to that grant, provided it is lawful in Tunisia. Where a donor requirement conflicts with Tunisian law or with TIPCS's independence, section 7.5 applies.

3. Definitions

In this policy:

Term	Meaning
Counterparty	Any natural or legal person from whom TIPCS receives funds or to whom it transfers funds, goods or services of value: donors, partners, sub-grantees, consultants, suppliers and co-organisers.
Due diligence	The reasonable, documented steps taken to know who a counterparty is, who owns or controls it, where its money comes from or goes to, and whether it presents a legal, sanctions, integrity or reputational risk.
Sanctions list	A list of persons, groups and entities subject to asset freezes or other restrictive measures, in particular the UN Security Council Consolidated List, the national list adopted by the National Counter-Terrorism Commission (CNLCT), the EU consolidated financial sanctions list, the US OFAC lists and the UK Sanctions List.

Term	Meaning
Screening	Checking the name and identifying details of a counterparty (and, for legal persons, of its directors and known beneficial owners) against the sanctions lists, and recording the result.
Beneficial owner	The natural person or persons who ultimately own or control a legal person or arrangement, or on whose behalf a transaction is carried out.
Foreign funding	Aid, gifts and donations of foreign origin within the meaning of Article 41 of Decree-Law No. 2011-88, whether from foreign states, international organisations, foreign foundations, companies or individuals.
Red flag	A fact or circumstance that suggests a heightened risk and requires further checks before TIPCS proceeds (see section 11).
Suspicion	A reasonable belief, based on facts, that funds or a transaction may be linked to an offence, including money laundering or terrorist financing. Proof is not required.
Politically exposed person (PEP)	A person who holds or has held a prominent public function, and close family members and associates of such a person.

4. Principles

- **Legality:** TIPCS shall not knowingly receive, hold, move or give funds or other assets that come from, or are intended for, terrorism, money laundering, organised crime or any person or entity on a sanctions list that binds it.
- **Independence and non-partisanship:** TIPCS accepts no funding that would compromise its independence, its research integrity or its nonpartisan character, and gives no financial or material support to political parties or candidates.
- **Transparency:** TIPCS records all funds, publishes foreign funding as the law requires and discloses its principal funders every year.
- **Risk-based proportionality:** the depth of checks rises with the level of risk, in line with FATF Recommendation 8. Low-risk relationships are handled simply; high-risk ones receive enhanced measures.
- **Do no harm:** checks are carried out in a way that does not endanger staff, partners, research participants or communities, and does not stigmatise any group on grounds of religion, origin, region or opinion.
- **Documentation:** a check that is not recorded is treated as not done.
- **Data minimisation and confidentiality:** TIPCS collects only the personal data needed for these checks and protects them under Organic Law No. 2004-63.

5. Legal and standards basis

5.1 Tunisian law

Instrument	Main requirements relevant to this policy
Decree-Law No. 2011-88 of 24 September 2011 on the organisation of associations	Art. 3: associations respect the rule of law, democracy, pluralism, transparency, equality and human rights in their statutes, activities and funding. Art. 4: an association may not raise funds to support political parties or candidates in national, regional or local elections, or give them material support. Art. 34: resources consist of members' dues, public aid, gifts, donations and legacies of national or foreign origin, and revenue from the association's property, activities and projects. Art. 35: aid, gifts and donations from states that have no diplomatic relations with Tunisia, or from organisations defending the interests and policies of such states, are prohibited. Art. 37: resources must be devoted to the association's objectives. Art. 38: all receipts and payments above 500 dinars are made by bank or postal transfer or cheque; splitting to avoid the threshold is not allowed; bank or postal accounts may be frozen only by court decision. Art. 39: accounts are kept under the enterprise accounting system. Art. 40: registers are kept, including a register of aid, gifts, donations and legacies distinguishing in-kind from cash, public from private and national from foreign. Art. 41: foreign aid, gifts and donations are published with their source, value and purpose in a written medium and on the association's website within one month of the decision to request them or of their receipt, and the Secretary General of the Government is informed by registered letter with acknowledgement of receipt within the same period. Art. 42: financial documents and registers are kept for ten years. Art. 43: auditor requirements above 100,000 and 1,000,000 dinars of annual resources. Art. 44: associations receiving public funding report annually to the Court of Auditors. Art. 45: breaches of, among others, arts. 35, 38, 40(4), 41 and 42 lead to formal notice, suspension of activities and, ultimately, dissolution.
Organic Law No. 2015-26 of 7 August 2015 on combating terrorism and preventing money laundering, as amended and supplemented by Organic Law No. 2019-9 of 23 January 2019	Prohibits all forms of support and financing for persons, organisations or activities linked to terrorist offences, even through non-profit bodies (art. 98). Requires legal persons, including associations, to apply prudential rules, among them refraining from receiving gifts or grants of unknown origin, from illegal acts, or from persons or organisations involved in terrorism-related activities, and limiting cash receipts (art. 99, as amended in 2019). Requires legal persons to keep a journal of receipts and payments, an inventory of receipts, transfers and cash deposits connected with foreign countries (copied to the Central Bank of Tunisia) and to keep accounting books and documents for ten years (art. 100, as amended in 2019). Empowers the National Counter-Terrorism Commission to freeze assets of persons and organisations linked to terrorist offences, including on the basis of UN decisions (art. 103). Requires the reporting entities listed in art. 107 (banks, the postal office and others) to apply customer due diligence and to report suspicious transactions to the CTAF without delay (art. 125), without informing the person concerned (art. 127). Makes it an offence for anyone, even if bound by professional secrecy, to fail to report to the competent authorities, without delay, facts concerning terrorist offences of which they become aware (art. 37 in the original numbering).
Government Decree No. 2019-419 of 17 May 2019 on the procedures for implementing resolutions of the competent UN bodies relating to the suppression of terrorist financing and the non-proliferation of weapons of mass destruction	Sets the national procedure by which UN Security Council designations and national freezing decisions are implemented in Tunisia; TIPCS therefore treats UN and CNLCT listings as legally binding on it.

Instrument	Main requirements relevant to this policy
Organic Law No. 2004-63 of 27 July 2004 on the protection of personal data	Governs the collection, processing, retention and transfer of personal data obtained during due diligence, under the supervision of the National Authority for the Protection of Personal Data (INPDP).
Law No. 2018-52 of 29 October 2018 on the National Register of Enterprises	Establishes the National Register of Enterprises (RNE), which includes associations and beneficial-ownership information; TIPCS uses RNE extracts to verify Tunisian counterparties and keeps its own registration up to date.

5.2 International standards and donor rules

- United Nations Security Council sanctions regimes and the UN Security Council Consolidated List, and Security Council Resolution 2664 (2022), which provides a standing humanitarian exemption to UN asset freezes.
- FATF Recommendation 8 and its Interpretive Note, as revised in November 2023, and the FATF Best Practices Paper on combating the terrorist financing abuse of non-profit organisations, which require a focused, proportionate, risk-based approach that does not disrupt legitimate NPO activity.
- European Union restrictive measures (EU sanctions), which bind EU-funded grants, and the exclusion and sanctions clauses of EU grant agreements.
- United States sanctions administered by the Office of Foreign Assets Control (OFAC) and United Kingdom sanctions, where they bind a donor or apply under a grant agreement, including through US-dollar or sterling transactions.
- The Core Humanitarian Standard on Quality and Accountability (CHS) and the United Nations Convention against Corruption, as reference standards for accountability and integrity.

Sanctions lists change frequently. Staff must always search the current official list on the day of the check and must never rely on a saved copy or a previous result.

6. Roles and responsibilities

Role	Responsibilities under this policy
Board	Adopts this policy and its amendments; receives the annual due-diligence report; decides on high-risk funding referred to it; oversees compliance and ensures that resources are available for training and screening.
Chairperson	Ensures the Board exercises its oversight; co-signs, with the Secretary General, decisions referred to the Board; is informed without delay of any confirmed sanctions match or report to the authorities.
Vice-Chairperson	Replaces the Chairperson when absent or conflicted; may be designated by the Board to review the annual due-diligence report.
Secretary General	Issues this policy and its procedures; accepts or refuses medium- and high-risk funds within the limits in section 15; decides on potential matches; signs Article 41 notifications to the Secretary General of the Government; decides on reports to the authorities; informs donors as required; reports to the Board.

Role	Responsibilities under this policy
Treasurer	Keeps the due-diligence and screening register and the register of aid, gifts, donations and legacies (art. 40); ensures that all funds pass through TIPCS bank or postal accounts; verifies payee accounts before payment; prepares the foreign-funding register entries; keeps records for ten years; prepares the annual due-diligence summary.
Executive team	Carries out screening and due diligence before any commitment; completes Annexes A to D; applies contract clauses; monitors partners during implementation; escalates red flags within the time limits set in section 15.
Heads of department (including Research and the Academy)	Identify counterparties in their projects early, request screening before commitments, and apply the safeguards in section 14 to fieldwork and training.
All staff, volunteers and consultants	Apply this policy, report red flags and suspicions immediately, and never alert a person who may be the subject of a report.

No person may approve a transaction or a counterparty in which he or she has a personal interest. In that case the matter goes to the next level in section 15, in line with the TIPCS Conflict of interest policy.

7. Acceptance and refusal of funds

7.1 Permitted sources

TIPCS may accept the resources listed in Article 34 of Decree-Law No. 2011-88: membership dues, public aid, gifts, donations and legacies of national or foreign origin, and revenue from its property, activities and projects, provided the conditions of this policy are met. Every resource must serve TIPCS's statutory objectives (Article 37).

7.2 Mandatory refusal

TIPCS shall refuse, or return under section 15.4, any funds or in-kind support where:

- the donor, its controlling persons or the payer is on the UN Consolidated List or the CNLCT national list, or on an EU, OFAC or UK list that binds TIPCS or the relevant donor;
- the funds come from a state that has no diplomatic relations with Tunisia, or from an organisation that defends the interests and policies of such a state (Article 35 of Decree-Law No. 2011-88);
- the origin of the funds is unknown or cannot be established, the donor insists on anonymity towards TIPCS, or the funds appear to come from an illegal act (Article 99 of Organic Law No. 2015-26, as amended);
- the funds are offered in cash or crypto-assets, or through a payment channel that does not pass through a TIPCS bank or postal account;
- the funds are intended, directly or indirectly, to support a political party or candidate (Article 4 of Decree-Law No. 2011-88), or are conditional on TIPCS taking a partisan position;
- the conditions attached would require TIPCS to break Tunisian law, to alter or suppress research findings, to disclose confidential data on research participants, or to discriminate on grounds prohibited by Article 4 of Decree-Law No. 2011-88.

7.3 Discretionary refusal and conditions

The Secretary General may refuse funds, or accept them subject to conditions, where acceptance would create a material risk to TIPCS's independence, reputation, safety of staff or partners, or the trust of the communities it works with. Relevant factors include: a donor whose core activities conflict with TIPCS's peace mission (for

example the manufacture or trade of weapons); a donor that is a party to an armed conflict TIPCS studies; a single source that would represent a disproportionate share of TIPCS's annual income; unresolved adverse media; or a request for visibility that could endanger participants.

7.4 How funds are received

- Gifts, donations and grants are received only by bank or postal transfer into an account held in TIPCS's name. TIPCS does not accept gifts in cash, by money-transfer agents, by crypto-assets or through any personal account.
- Membership dues and gifts are received by bank transfer only, into the TIPCS bank or post-office account. Cash is not accepted for dues or gifts.
- The payer must be the donor named in the agreement or donor questionnaire. Payments from a third party require prior written explanation and approval by the Secretary General.
- Funds received before screening has been completed are recorded as 'pending' and may not be spent until cleared.

7.5 Review of grant agreements

Before signature, the Secretary General, assisted by the Treasurer, reviews every grant agreement for clauses on sanctions and counter-terrorism, audit and access to records, publicity, data protection, intellectual property and independence. TIPCS shall not sign an agreement requiring it to screen research participants or beneficiaries beyond what Tunisian law and this policy allow, to transfer personal data unlawfully, or to accept political conditions. Where a clause is unclear or appears to conflict with Tunisian law, TIPCS shall seek clarification from the donor in writing and, where needed, legal advice before signing.

8. Sanctions screening

8.1 Who is screened and when

Counterparty	Trigger	Re-screening
Donors (individuals and organisations)	Before accepting any gift or grant above 1,000 TND, or any amount from a new or unusual source	Annually for continuing donors and at each new agreement or change of payer
Partners and sub-grantees	Before signing any agreement or transferring any funds	Annually, before each tranche above 10,000 TND, and on any change of directors or ownership
Consultants and trainers	Before contracting	Annually for contracts longer than 12 months
Suppliers	Before any order or cumulative annual spend above 5,000 TND, or any supplier paid outside Tunisia	Annually while active
Recipients of stipends, prizes or travel support	Before payment above 1,000 TND per person per year	At each new award
Board members and senior staff	On election or appointment	Annually

Every partner, sub-grantee or donor is screened before the first transfer, whatever the amount. The thresholds above apply only to suppliers, stipends and small gifts from known Tunisian sources.

8.2 Lists and tools

Screening uses the free official search pages below. TIPCS may also use a reputable commercial screening tool, but this never replaces a check of the UN and CNLCT lists.

List	Official search tool	Status for TIPCS
UN Security Council Consolidated List	scsanctions.un.org/search	Always binding (Organic Law No. 2015-26, art. 103; Decree No. 2019-419)
National list of the National Counter-Terrorism Commission (CNLCT)	Official CNLCT website (cnlct.tn) and decisions published in the JORT	Always binding
EU consolidated list of financial sanctions	EU Sanctions Map (sanctionsmap.eu) and the EU consolidated list on data.europa.eu	Mandatory for all EU-funded activities and all donors and partners based in the EU
US OFAC Specially Designated Nationals and other lists	OFAC Sanctions List Search (sanctionssearch.ofac.treas.gov)	Mandatory for US-funded grants and US-dollar transactions; applied as good practice for all other counterparties
UK Sanctions List	Search the UK Sanctions List (search-uk-sanctions-list.service.gov.uk)	Mandatory for UK-funded grants and sterling transactions; applied as good practice otherwise
Debarment lists (World Bank and other multilateral development banks; EU exclusion database where accessible)	World Bank listing of ineligible firms and individuals	Recommended for partners and suppliers in donor-funded projects

8.3 Screening procedure

1. Collect the full legal name, any other names or transliterations (Arabic, Latin and other scripts), date of birth or registration, nationality or country of registration and address. For legal persons, also collect the names of directors and known beneficial owners.
2. Search each name on every applicable list, using spelling variants and, where the tool permits, fuzzy matching.
3. Record the date, the lists and tools used, the search terms, the result and the name of the person who carried out the check, using Annex C. Keep a screenshot or printout of each result page.
4. Classify the result as 'no match', 'potential match' or 'confirmed match' and proceed under section 8.4.

8.4 Handling matches

Result	Action	Time limit
No match	Record and proceed with the risk rating (section 9).	—

Result	Action	Time limit
Potential match (similar name, incomplete data)	Suspend the commitment or payment. Compare identifiers (date of birth, nationality, address, registration number). Escalate to the Secretary General with Annex C. Do not inform the counterparty of the reason.	Escalation within 1 working day; decision within 5 working days
False positive (identifiers differ)	The Secretary General records the reasons for clearance; processing resumes.	Same day as decision
Confirmed match	Do not accept, pay or make available any funds or economic resources. Keep any funds already received in the account without moving them. Inform the Chairperson. Notify the bank and the competent authority under section 12 and the donor under section 15.3, subject to the no-tipping-off rule.	Immediately, and no later than 1 working day

9. Risk rating

After screening, every donor, partner and sub-grantee, and every supplier above the threshold in section 8.1, receives a risk rating using the matrix in Annex D. Each of the following factors is scored 1 (low), 2 (medium) or 3 (high):

- identity and transparency (verifiable registration, published accounts, clear ownership);
- geography (country of registration, operation and bank, including jurisdictions identified by the FATF as subject to a call for action or increased monitoring, and areas of active armed conflict);
- nature and size of the funds (amount relative to TIPCS's annual budget, restrictions, in-kind assets);
- payment channel (regulated bank in the counterparty's name, or third parties and intermediaries);
- reputation and adverse media, including links with politically exposed persons;
- independence (conditions on content, visibility or partisan alignment);
- track record (previous relationship with TIPCS, audit findings, references).

Total score (7 factors)	Rating	Required measures	Approval
7–10	Low	Standard due diligence: screening, identity and registration documents, Annex A or B.	Treasurer
11–15	Medium	Standard measures plus source-of-funds explanation, two references or published accounts, and specific contract safeguards.	Secretary General
16–21, or any single factor scored 3 for sanctions geography, payment channel or independence	High	Enhanced due diligence: beneficial-ownership verification, documented source of funds, interview, tranche payments, enhanced monitoring and reporting.	Secretary General and Chairperson; Board informed at its next meeting
Any mandatory refusal criterion (section 7.2) or confirmed match	Prohibited	Refuse or return; apply sections 12 and 15.	No approval possible

10. Due diligence on partners, sub-grantees, consultants and suppliers

10.1 Minimum checks

Before signing with a partner, sub-grantee, consultant or supplier above the threshold, the executive team completes Annex B and verifies at least: identity and legal registration (for Tunisian entities, an extract from the National Register of Enterprises; for foreign entities, the equivalent official register); the names of directors and, where known, beneficial owners; the bank account, which must be in the counterparty's own name; reputation, through an open-source and media search in Arabic, French and English; sanctions and debarment screening; and, for partners and sub-grantees, governance, financial management capacity and their own safeguarding and anti-fraud arrangements.

10.2 Contract clauses

Every agreement with a partner, sub-grantee, consultant or supplier shall include clauses by which the counterparty:

- declares that neither it nor its directors or beneficial owners are on any applicable sanctions list;
- undertakes to comply with applicable law and sanctions and not to make funds available to listed persons;
- undertakes to inform TIPCS within 5 working days of any listing, investigation or prosecution concerning it or its directors;
- applies equivalent screening to its own sub-contractors paid with TIPCS funds (flow-down);
- grants TIPCS, its donors and auditors access to relevant records for ten years;
- accepts that TIPCS may suspend payments, terminate the agreement and recover funds in case of breach.

10.3 Payments and monitoring

- Payments are made only by transfer to an account in the name of the contracting party, in the country where it is established or operates, after the Treasurer has checked the account details against the contract. Any change of bank details must be confirmed by a call-back to a known contact before payment.
- Sub-grants are paid in tranches linked to reports. Partners report on the use of funds with supporting documents, and TIPCS checks a sample of expenditure.
- High-risk partners receive at least one monitoring visit or remote verification per year and before the final payment.

11. Red flags

The following are examples of red flags. None proves wrongdoing, but each must be recorded and resolved, or escalated, before TIPCS proceeds:

- a donor or partner who refuses to identify itself, its directors or beneficial owners, or gives inconsistent information;
- an offer of cash, crypto-assets, or payment from a third party or from a country unrelated to the donor;
- a gift that is unusually large for the donor's profile, or that is followed by a request to refund part of it to another account (round-tripping);
- conditions that restrict TIPCS's independence, dictate research conclusions or require political positions;
- a request to pay a partner or supplier into an account in another name or another country, or to split invoices;
- adverse media alleging links to terrorism, armed groups, corruption, money laundering or sanctions evasion;
- unexplained urgency, pressure to skip checks, or insistence that a transaction not be recorded;
- a partner with no verifiable track record, address or staff, or whose costs are far above market rates;

- requests to transport cash or goods across borders on TIPCS's behalf, or to use TIPCS's name or account for another organisation's funds.

12. Suspicious transactions and reporting to the authorities

12.1 Internal reporting

Any staff member, officer or volunteer who suspects that funds or a transaction may be linked to money laundering, terrorist financing, sanctions evasion or another offence must report it at once to the Secretary General, or, if the Secretary General is concerned, to the Chairperson, through the channels in the Whistleblowing and complaints policy. The reporter is protected against retaliation.

12.2 Reporting to CTAF and other authorities

The Secretary General assesses the report within 2 working days. Where the suspicion is reasonable, TIPCS shall, without delay: (a) inform its bank, which is itself a reporting entity under Articles 107 and 125 of Organic Law No. 2015-26, so that the bank can make its declaration; and/or (b) send a written report directly to the Tunisian Financial Analysis Commission (CTAF). Where facts concern a terrorist offence, TIPCS shall also inform the competent judicial or security authorities without delay, as the law requires of everyone. TIPCS shall cooperate fully with the CTAF, the bank and the authorities, and comply with any freezing order.

12.3 No tipping-off

No one may inform the person concerned, or any third party, that a report has been or may be made, or of any resulting measures. Refusals and suspensions are communicated in neutral terms. Where returning funds could alert the person concerned, the funds are held and the CTAF or the bank is consulted before any return.

12.4 Freezing decisions

If TIPCS holds funds or economic resources belonging to, or due to, a person or entity designated by the UN Security Council or by the National Counter-Terrorism Commission, it shall freeze them immediately, make nothing available to that person, and inform the CNLCT and its bank of the measures taken, as required by Article 103 of Organic Law No. 2015-26 and Decree No. 2019-419.

13. Foreign funding: register, publication and notification

TIPCS may receive foreign funding, subject to Article 35 of Decree-Law No. 2011-88 and to this policy. For every item of foreign aid, gift or donation, TIPCS shall:

- record it in the register of aid, gifts, donations and legacies, identifying it as foreign, as cash or in-kind, and as public or private (Article 40, fourth);
- publish its source, value and purpose in a written medium and on the TIPCS website (Funding and transparency page) within one month of the decision to request it or of its receipt, whichever is earlier (Article 41);
- inform the Secretary General of the Government, within the same one-month period, by registered letter with acknowledgement of receipt, signed by the Secretary General of TIPCS (template in Annex E);
- keep the publication evidence, the letter and the acknowledgement of receipt with the register entry for ten years;
- respect the reporting duties of its bank on incoming foreign transfers and provide the bank with the documents it requests, including those connected with the inventory of foreign receipts required by Article 100 of Organic Law No. 2015-26.

Step	Responsible	Deadline
Register entry (Annex E, part 1)	Treasurer	Within 5 working days of the decision to request or of receipt
Website publication	Secretary General	Within 15 days (legal limit: one month)
Publication in a written medium	Secretary General	Within one month
Registered letter to the Secretary General of the Government (Annex E, part 2)	Secretary General	Sent within 20 days (legal limit: one month)
Annual disclosure of principal funders and their share of income	Secretary General and Treasurer	With the annual financial statements

Internal deadlines are deliberately shorter than the legal one-month limit so that the legal deadline is never missed. A delay beyond one month is a breach of Article 41 that can lead to a formal notice and suspension under Article 45 of Decree-Law No. 2011-88.

14. Safeguards for peace, research and humanitarian work

Consistent with FATF Recommendation 8 and its emphasis on avoiding disruption of legitimate non-profit activity, TIPCS applies the following safeguards:

- Participants in public events, trainings, focus groups, interviews and surveys are not screened against sanctions lists as a condition of participation. TIPCS does, however, refrain from paying cash, stipends or material support to any person known to be listed, and screens individual payments above the threshold in section 8.1.
- Research and dialogue that require contact with conflict parties, former combatants or affected communities are lawful peace work. Such contact is approved in advance under the Research ethics and independence policy, documented, and never involves the provision of funds, goods, services, training of military value or other material support to designated persons or groups.
- Where a grant agreement or law provides a humanitarian exemption or licence (for example under UN Security Council Resolution 2664 (2022) or an EU or UK humanitarian exception), TIPCS relies on it only after documented legal verification and with the donor's written agreement where required.
- TIPCS does not use nationality, religion, ethnicity, region of origin, dress or political opinion as a proxy for risk. Risk ratings are based on facts listed in section 9.
- TIPCS does not share lists of research participants or beneficiaries with donors for screening purposes. Where a donor requests this, TIPCS proposes alternative assurance (for example, screening of partners and payees, and audit access to anonymised records).

15. Escalation, decisions and donor notification

15.1 Decision levels

Situation	Decision-maker	Time limit
Low-risk counterparty, no red flags	Treasurer	Before commitment

Situation	Decision-maker	Time limit
Medium risk, or a red flag resolved by documents	Secretary General	Within 5 working days of escalation
High risk, or single funding above 25% of the previous year's income	Secretary General with the Chairperson; Board informed	Within 10 working days
Potential sanctions match	Secretary General	Escalation within 1 working day; decision within 5
Confirmed match, suspicion or freezing obligation	Secretary General, Chairperson informed immediately	Without delay (section 12)
Secretary General conflicted or concerned	Chairperson (or Vice-Chairperson)	Same limits

15.2 Record of decisions

Every decision to accept, accept with conditions, refuse or return funds, and every clearance of a potential match, is recorded in writing with its reasons and kept in the due-diligence register.

15.3 Donor notification

Where a grant agreement requires it, TIPCS informs the donor of any confirmed sanctions match, suspected misuse of the donor's funds or freezing measure affecting a funded project, within the period set by the agreement or, if none is set, within 5 working days of the Secretary General's decision. The notification states the facts and the measures taken, but does not disclose the content of any report to the CTAF where disclosure is prohibited, nor personal data beyond what is necessary.

15.4 Returning refused funds

Funds refused for reasons other than a sanctions match or suspicion are returned to the originating account within 30 days, by transfer only. Funds linked to a confirmed match or a suspicion are never returned or moved without instructions from the CTAF, the CNLCT, the bank or a court.

16. Record-keeping

TIPCS keeps the following for ten years from the end of the financial year concerned or from the end of the relationship, whichever is later, in line with Article 42 of Decree-Law No. 2011-88 and Article 100 of Organic Law No. 2015-26: the register of aid, gifts, donations and legacies; the foreign-funding register, publications, letters and acknowledgements of receipt; donor questionnaires and partner checklists (Annexes A and B); screening records with screenshots (Annex C); risk ratings (Annex D); decisions and their reasons; contracts and grant agreements; payment records and supporting documents; and internal reports and their follow-up.

Records are kept in paper or electronic form, in a way that allows them to be retrieved and read throughout the retention period. Records connected with a report to the authorities are kept in a restricted file accessible only to the Secretary General and the Chairperson.

17. Data protection

- Personal data collected under this policy are processed only to meet TIPCS's legal obligations and legitimate due-diligence needs, in accordance with Organic Law No. 2004-63 and the TIPCS Privacy policy, including any declaration or authorisation required by the INPDP.

- Only the minimum data needed are collected: identity details, role, nationality or country, and the screening result. TIPCS does not collect data on religion, health or political opinion for due-diligence purposes.
- Information about alleged offences found in open sources is recorded factually, with its source, and used only to assess risk; TIPCS does not build files on criminal matters.
- Counterparties are informed, through the questionnaires in Annexes A and B, that screening will take place, why, and how they can exercise their rights of access and rectification.
- Personal data are transferred to donors or foreign authorities only where required by a grant agreement or by law, and only in compliance with the rules of Organic Law No. 2004-63 on transfers abroad.
- Screening files are stored securely with access limited to the Treasurer, the Secretary General and the staff member responsible, and are destroyed securely at the end of the retention period.

18. Training and awareness

TIPCS shall provide an induction on this policy to every Board member, member of the executive team and staff member who handles funds, contracts or partners, within one month of taking up their role, and refresher training at least every two years. Partners and sub-grantees receive a summary of this policy with their agreement. Training covers the legal framework, screening tools, red flags, the no-tipping-off rule, data protection and the humanitarian safeguards in section 14. Attendance is recorded.

19. Monitoring, audit and review

- The Treasurer prepares an annual due-diligence summary for the Board: number of counterparties screened by category, risk ratings, potential and confirmed matches, refusals and returns, foreign-funding notifications made and their dates, internal reports (without identifying reporters) and training delivered.
- The Secretary General checks, at least every six months, a sample of files to confirm that screening was done before commitment and that Article 41 deadlines were met.
- Where TIPCS has an auditor under Article 43 of Decree-Law No. 2011-88, or a donor audit takes place, the auditor is given access to the due-diligence register.
- The Board reviews this policy every year, and earlier if the law, the sanctions framework or donor requirements change significantly.

20. Breaches and sanctions

A breach of this policy, including failing to screen, ignoring a red flag, accepting prohibited funds, splitting payments, falsifying records or alerting a person who may be the subject of a report, may lead to disciplinary measures for staff under their employment contract and the internal rules, termination of a consultancy or partnership, or, for Board members, measures under the TIPCS statutes. TIPCS will report conduct that may constitute an offence to the competent authorities. Staff who report in good faith are protected, even if the suspicion is not confirmed.

The institutional consequences of non-compliance are serious: under Article 45 of Decree-Law No. 2011-88, breaches of the funding and record-keeping rules expose TIPCS to a formal notice from the Secretary General of the Government, suspension of its activities and, ultimately, dissolution by court decision.

21. Relationship to other TIPCS policies

- Anti-fraud and anti-corruption policy: misuse of funds, bribery and fraud by counterparties or staff.

- Conflict of interest policy: declarations and recusal in due-diligence decisions.
- Whistleblowing and complaints policy: channels and protection for internal reports.
- Research ethics and independence policy: independence from funders and approval of sensitive fieldwork contacts.
- Safeguarding policy and Code of conduct: protection of participants and expected behaviour of staff and partners.
- Privacy policy: processing of personal data under Organic Law No. 2004-63.

22. Glossary of abbreviations

Abbreviation	Meaning
CNLCT	National Counter-Terrorism Commission
CTAF	Tunisian Financial Analysis Commission (Tunisia's financial intelligence unit)
FATF	Financial Action Task Force
INPDP	National Authority for the Protection of Personal Data
JORT	Official Journal of the Republic of Tunisia
NPO	Non-profit organisation
OFAC	Office of Foreign Assets Control (United States Treasury)
PEP	Politically exposed person
RNE	National Register of Enterprises
TND	Tunisian dinar

23. Approval and version history

Version	Date	Description	Issued by
1.0	25 October 2026	Full policy document, expanding the summary published on the TIPCS website; annexes A to E.	Secretary General

Next scheduled review: October 2027, or earlier as provided in section 19.

Approval and document control

Document number	TIPCS-POL-06
Version	1.0
Date of issue	25 October 2026
Policy owner	Secretary General

Next review	October 2027 (and after any serious incident or change of law)
Applies to	Board members, staff, experts, researchers, interns, volunteers, consultants, partners and suppliers acting for TIPCS
Status	In force; ratified by the Board of Directors and legally reviewed

Version	Date	Change
1.0	25 October 2026	First issue

Issued by the Secretary General
Name, signature and date

Ratified by the Board of Directors — Chairperson
Name, signature and date

References

1. Decree-Law No. 2011-88 of 24 September 2011 on the organisation of associations (French JORT text) — <https://chaexpert.com/documents/D%C3%A9cret-loi%202011-88%20Associations%20Fr.pdf>
2. Organic Law No. 2015-26 of 7 August 2015 on combating terrorism and preventing money laundering (JORT text, FAOLEX) — <https://faolex.fao.org/docs/pdf/tun199705.pdf>
3. MENAFATF – Tunisia follow-up report 2020 (FATF) — <https://www.fatf-gafi.org/content/dam/fatf-gafi/fsrb-fur/MENAFATF-FUR-Tunisia-2020.pdf>
4. MENAFATF – Tunisia 3rd follow-up report (FATF) — <https://www.fatf-gafi.org/content/dam/fatf-gafi/fsrb-fur/MENAFATF-3rd-FUR-Tunisia.pdf.coredownload.pdf>
5. Law No. 9 of 2019 amending Law No. 26 of 2015 (UN ESCWA legislation database) — <https://alp.unescwa.org/ar/node/644>
6. Government Decree No. 2019-419 of 17 May 2019 (CMF reference texts, Arabic) — https://cmf.tn/sites/default/files/pdfs/reglementation/textes-reference/dec2019_419_17052019_ar.pdf
7. Law No. 2018-52 of 29 October 2018 on the National Register of Enterprises (ICNL) — <https://www.icnl.org/wp-content/uploads/Loi-n°-2018-52-du-29-octobre-2018-2-1.docx>
8. CNLCT national list publication (L'Économiste Maghrébin, 28 April 2021) — <https://www.leconomistemaghrebin.com/2021/04/28/liste-personnes-organisations-entites-associees-infractions-terroristes/>
9. Business News – status of Decree-Law 88 and pending draft law (14 March 2026) — <https://businessnews.com.tn/2026/03/14/decret-loi-88-sur-les-associations-fatma-mseddi-conteste-la-position-de-thabet-el-abad/1392183/>
10. UN Security Council Consolidated List – search — <https://scsanctions.un.org/search>
11. EU Sanctions Map — <https://www.sanctionsmap.eu>
12. OFAC Sanctions List Search — <https://sanctionssearch.ofac.treas.gov/>
13. The UK Sanctions List (gov.uk) — <https://gov.uk/government/publications/the-uk-sanctions-list>
14. Search the UK Sanctions List — <https://search-uk-sanctions-list.service.gov.uk/>
15. FATF Plenary approves revision of Recommendation 8 and new best practices (2023) — <https://fatfplatform.org/news/plenary-approves-revision-of-recommendation-8-and-new-best-practices/>
16. OSCE – Implementation of the revised standards of FATF Recommendation 8 — <https://www.osce.org/secretariat/601809>
17. ICNL – Tunisia shadow FATF report summary — <https://www.icnl.org/wp-content/uploads/Tunisia-Shadow-FATF-report-summary.pdf>

This document is public. It is a governance commitment and does not replace legal advice.

Annex A — Donor due-diligence questionnaire

To be completed by, or with, any donor offering a gift or grant above 1,000 TND, or from a new or unusual source, before acceptance. Institutional donors (UN agencies, EU institutions, government agencies) may attach their public registration information instead of answering parts 1 and 2.

Part 1 – Identity

Full legal name of the donor (and any other names or transliterations)

Type: individual / foundation / company / public body / international organisation / other

Date of birth or registration; nationality or country of registration

Registration or identity document number and issuing authority

Address, website and contact person

Names of directors and of beneficial owners holding 25% or more, or otherwise controlling the donor

Part 2 – Funds

Amount and currency; single or multi-year

Purpose and any restrictions or conditions

Origin of the funds (e.g. own resources, public budget, endowment, business income)

Paying bank, account holder name and country

Will any third party pay on the donor's behalf? If yes, explain

Visibility or publicity requested

Part 3 – Declarations by the donor

- The donor, its directors and beneficial owners are not on any UN, Tunisian, EU, US or UK sanctions list.
- The funds are of lawful origin and do not come from a state without diplomatic relations with Tunisia or from an organisation defending the interests of such a state.
- The donor accepts that TIPCS is independent and nonpartisan, that it will not alter research findings, and that foreign funding will be published and notified as Tunisian law requires.
- The donor has been informed that TIPCS will screen the names provided and keep this form for ten years under Organic Law No. 2004-63, and that it may exercise its rights of access and rectification by writing to the Secretary General.

Name, title and signature of the donor or authorised representative; date

Part 4 – For TIPCS use

Screening record reference (Annex C) and result

Risk rating (Annex D): low / medium / high / prohibited

Foreign funding? yes / no – if yes, register entry reference (Annex E)

Decision: accept / accept with conditions / refuse – reasons

Decision-maker, signature and date

Annex B — Partner, sub-grantee and supplier due-diligence checklist

To be completed by the executive team before signing any agreement with a partner, sub-grantee, consultant or supplier above the threshold in section 8.1, and updated annually.

Counterparty name, type and country

Project, contract value and duration

TIPCS staff member responsible

Check	Done (yes / no / not applicable)	Evidence reference and comments
Legal registration verified (RNE extract or foreign equivalent, dated within 3 months)		
Statutes or articles of association and list of directors obtained		
Beneficial owners identified, where applicable		
Bank account in the counterparty's own name confirmed (bank certificate)		
Sanctions screening of the entity, directors and beneficial owners done (Annex C)		
Debarment lists checked (for donor-funded projects)		
Open-source and media search in Arabic, French and English done, results recorded		
Latest annual accounts or financial statements reviewed (partners and sub-grantees)		
Governance, financial controls, safeguarding and anti-fraud arrangements assessed (partners and sub-grantees)		
Two references or evidence of previous similar work obtained (medium and high risk)		
Conflict-of-interest declaration by the TIPCS staff member responsible		
Contract includes the clauses in section 10.2		
Price compared with market rates (suppliers and consultants)		

Red flags identified and how they were resolved

Risk rating (Annex D) and required measures

Completed by (name, signature, date)

Approved by (Treasurer / Secretary General / Chairperson), signature and date

Annex C — Sanctions screening record

One record per counterparty per screening. Attach a screenshot or printout of each result page. Keep for ten years.

Record reference number

Counterparty and category (donor / partner / sub-grantee / consultant / supplier / payee / Board or staff)

Names searched, including variants and transliterations; related persons (directors, beneficial owners)

Identifiers used (date of birth or registration, nationality, document or registration number)

List / tool	Date and time searched	Result (no match / potential / confirmed)
UN Security Council Consolidated List		
CNLCT national list		
EU consolidated financial sanctions list / EU Sanctions Map		
OFAC Sanctions List Search		
UK Sanctions List		
Debarment lists (if applicable)		
Open-source and media search		

For a potential match: identifiers compared and conclusion

Escalated to the Secretary General on (date and time)

Decision: cleared (false positive) / confirmed match – actions taken under sections 8.4, 12 and 15

Screened by (name, signature, date)

Reviewed by (name, signature, date)

Annex D — Risk-rating matrix

Score each factor 1, 2 or 3 and add the scores. Apply the thresholds and measures in section 9. If any mandatory refusal criterion in section 7.2 applies, the rating is 'prohibited' whatever the score.

Counterparty and date of assessment

Factor	1 – Low	2 – Medium	3 – High	Score
Identity and transparency	Registered, published accounts, clear ownership	Registered, limited public information	Unverifiable registration or ownership, reluctance to disclose	
Geography	Tunisia or country with sound AML/CFT framework	Country under FATF increased monitoring, or neighbouring an active conflict	Country subject to FATF call for action, comprehensive sanctions, or active armed-conflict area	
Nature and size of funds	Below 10% of annual income, no unusual conditions	10–25% of annual income, or in-kind assets	Above 25% of annual income, or unusual structure	
Payment channel	Regulated bank, account in own name	Regulated bank in a third country	Third-party payer or intermediary	
Reputation and adverse media	None found	Minor or resolved issues; PEP link without concerns	Credible allegations of serious wrongdoing	
Independence	No conditions on content	Visibility or reporting conditions needing negotiation	Conditions on findings, positions or partisan alignment	
Track record	Previous satisfactory relationship or strong references	New counterparty with some references	No references, or previous audit or compliance problems	

Total score and rating (low 7–10 / medium 11–15 / high 16–21 / prohibited)

Mitigating measures required

Assessed by / approved by (names, signatures, dates)

Annex E — Foreign-funding register entry and notification letter (templates)

TEMPLATE FOR REVIEW BY COUNSEL. These templates implement Articles 40 and 41 of Decree-Law No. 2011-88 as verified at the date of this policy. They must be reviewed by a Tunisian lawyer before first use and whenever the law or the administrative practice of the Presidency of the Government changes.

Part 1 – Register entry

Entry number and date of entry

Source (name and country of the foreign donor)

Nature: aid / gift / donation – cash or in-kind – public or private

Value (currency and TND equivalent at the date of receipt)

Purpose (project or activity)

Date of the decision to request the funds / date of receipt (whichever is earlier starts the one-month period)

Bank account credited and transfer reference

Screening record (Annex C) and risk rating (Annex D) references

Website publication date and link

Written medium, title and date of publication

Date of registered letter to the Secretary General of the Government, postal reference and date of acknowledgement of receipt

Entered by (Treasurer) and verified by (Secretary General), signatures

Part 2 – Notification letter to the Secretary General of the Government

[TIPCS letterhead] – Tunisian Institute for Peace and Conflict Studies (TIPCS), Avenue Mahmoud Bourguiba, Monastir 5000. Reference: [number]. [Place], [date].

To: the Secretary General of the Government, Presidency of the Government, Tunis. By registered letter with acknowledgement of receipt.

Subject: Notification of foreign funding under Article 41 of Decree-Law No. 2011-88 of 24 September 2011.

Sir/Madam, in accordance with Article 41 of Decree-Law No. 2011-88 on the organisation of associations, the Tunisian Institute for Peace and Conflict Studies (TIPCS) hereby informs you that it has [decided to request / received] the following foreign funding: source: [name and country]; nature: [aid / gift / donation, cash / in-kind]; value: [amount, currency, TND equivalent]; purpose: [project or activity]; date of [decision / receipt]: [date]. This information was published on [date] on the association's website at [link] and in [written medium] on [date]. A copy of the publications is attached. Yours faithfully, the Secretary General of TIPCS, [name], [signature and stamp].
Attachments: copies of the publications; extract of the register entry.