



Financial Intelligence Centre, Ghana

ADVISORY NOTICE

NOTICE No: AFH6/FIC/25/1/1

SAFEGUARDING AGAINST THE MISUSE AND ABUSE OF NPOS FOR TERRORIST FINANCING

The Financial Intelligence Centre (FIC) wishes to draw the attention of the Non-Profit Organisation (NPO) sector in Ghana to the provisions of the **Financial Action Task Force (FATF) Recommendation 8 and its Interpretive Notes**, which emphasize the need for countries to review the adequacy of laws and regulations related to NPOs that may be abused for terrorist financing (TF) purposes. FATF underscores that while the vast majority of NPOs operate legitimately, some may be misused by terrorist actors to:

1. Pose as legitimate entities.
2. Exploit legitimate NPOs as conduits for terrorism financing.
3. Divert funds intended for charitable purposes to support terrorist activities.

In line with this, the 2024 National Risk Assessment (NRA) of Ghana identified that most FATF-defined NPOs, particularly those operating along Ghana's northern borders with Burkina Faso, northern parts of Côte d'Ivoire and Togo (*including Bawku Municipality, Bawku West, Binduri, Garu, Tempane, Nyakpanduri, Yunyou, Nasuan, Chereponi*), are at an elevated risk of terrorism financing abuse due to their proximity to areas of heightened security concern and cross-border vulnerabilities.

GUIDANCE TO THE NPO SECTOR

The FIC urges all NPOs, especially those operating in these high-risk areas, to strengthen their internal governance, financial transparency and due diligence practices to safeguard against TF risks. Specifically, NPOs are advised to:

- **Conduct thorough due diligence** on donors, beneficiaries, and partners to ensure funds are not diverted for TF purposes.
- **Maintain accurate and up-to-date records** of financial transactions, including sources of funds and disbursements.
- **Implement strong internal controls** and risk-based monitoring systems, especially for cross-border activities.
- **Engage regularly with regulators and oversight bodies** to ensure compliance with national laws and international standards.

The FIC remains committed to working collaboratively with the NPO sector to strengthen resilience against terrorist financing risks. NPOs are encouraged to take this advisory seriously and adopt the necessary measures to safeguard their operations. This will not only protect the integrity of their activities but also preserve the trust of donors, beneficiaries, and the wider public.

ISSUED BY:
THE FINANCIAL INTELLIGENCE CENTRE
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