

# TERRORISM, CORRUPTION AND THE CRIMINAL EXPLOITATION OF NATURAL RESOURCES

October 2017 • [WWW.OECD.ORG/DAF](http://WWW.OECD.ORG/DAF)

“We underline our resolve to make the international financial system entirely hostile to terrorist financing and commit to deepening international cooperation and exchange of information, including working with the private sector, which has a critical role in global efforts to counter terrorist financing.”

“We call upon countries to address all alternative sources of financing of terrorism, including dismantling connections, where they exist, between terrorism and transnational organized crime.”

*The Hamburg G20 Leaders' Statement  
on Countering Terrorism, 2017*

This brochure looks at how corruption and the criminal exploitation of natural resources facilitate terrorism. It outlines how, in these areas, the OECD can help the international community respond to the threat caused by terrorism and identifies potential further work by the OECD.

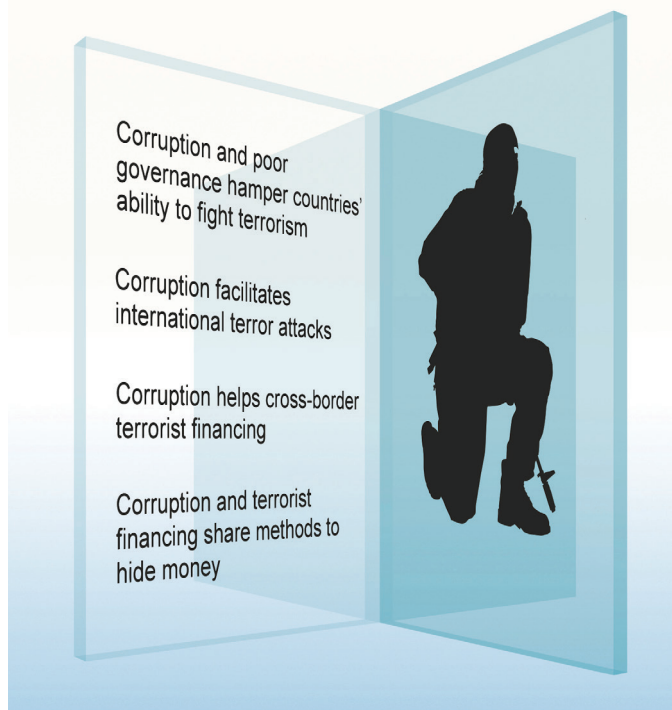
## TERRORISM AND CORRUPTION

Corruption and terrorism do not only join forces in conflict-affected countries where criminal activities are likely to flourish. In any country where endemic corruption has made the country itself or its neighbors vulnerable to terrorist activities, terrorist organisations are ready to use it to finance and perpetrate their acts. Like criminals and those ready to take their bribes, terrorist organisations depend on the same legal grey areas and the porosity of the financial sector to channel their financing. As such, no country is totally immune.

Identifying connections between corruption and terrorism, as well as the means to break them, is crucial to fighting terrorism. Four main types of connection can be identified:

- Corruption and poor governance hamper countries' ability to fight terrorism
- Corruption facilitates international terror attacks
- Corruption helps cross-border terrorist financing
- Corruption and terrorist financing share methods to hide money

### The intersecting worlds of corruption and terrorism



## CORRUPTION AND POOR GOVERNANCE HAMPER COUNTRIES' ABILITY TO FIGHT TERROR

State institutions weakened by ingrained and deep-seated corruption are not only less effective in fighting terrorism but are vulnerable to exploitation by terrorist groups. As pillars of state security and the rule of law, corruption in institutions such as the army, the police, the judiciary and in the defence sector is of great concern.

### Corruption in the army and the defence sector

Corruption in the army not only undermines its legitimacy and efficacy but can create significant security concerns. Widespread corruption has weakened armies' ability to halt terrorist groups such as Boko Haram or ISIL, particularly in countries where soldiers are not paid in full, are poorly equipped, and where morale is low. An anti-corruption representative from a large African country states: “There’s no doubt that the situation is strongly linked to corruption. Corruption weakened and escalated our insecurity. Because money for welfare that was appropriated for weapons wasn’t getting to base. And if it wasn’t getting there, how are you going to fight insurgency?”

The defence sector has been historically vulnerable to corruption, particularly to corruption of foreign public officials by companies from major defence-exporting countries, many of which are OECD countries and Parties to the OECD Anti-Bribery Convention.<sup>1</sup> With huge contracts and high secrecy, the defence sector poses unique corruption risks. Single-source or non-competitive contracts and unaccountable and overpaid agents are common in this secretive sector.

Corruption in defence is not just about sales commissions, it may also mean soldiers operating with ill-fitting or inadequate equipment, or with no equipment at all. Examples of fraud and corruption in the defence procurement process show how the misuse of public money in the defence sector weakens countries' capacity to fight terrorism and contributes to rising insecurity. "Nigerian troops were denied weapons to fight Boko Haram and thousands of lives were lost because of rampant fraud in the procurement process", Nigerian President Muhammadu Buhari declared when a corrupt, multi-billion-dollar deal for weapons and equipment was revealed in the press in November 2015.

Although stringent anti-bribery laws have been passed in most countries and compliance has become part of the lexicon of today's businesses, major corruption scandals continue to occur. According to a 2015 study by Transparency International, two-thirds of defence companies show little or no evidence of having programmes to combat corruption.<sup>2</sup> Governments and international bodies have a vital role to play in promoting more integrity in this sector. Sound financial management of a country's defence sector is key to ensuring that security forces are capable of responding to the terrorist threat and the population's security needs.

## Corruption in the police and the judiciary

In many countries, avoiding investigation or detection or impeding ongoing judicial or investigative processes can be accomplished by exerting influence, particularly at lower to mid levels of law enforcement structures. This can benefit both organised crime and terrorists. In the judicial sphere, judges and prosecutors can be corrupted by organised crime groups and terrorists who may activate already existing corruption networks, to escape pre-trial detention and obstruct justice.<sup>3</sup>

## CORRUPTION FACILITATES INTERNATIONAL TERROR ATTACKS

Terrorist groups may seek funding through crime out of financial necessity or simply because the potential profits associated with the criminal activity are too attractive to ignore. Terrorists may also be involved in some forms of criminal activity both as a source of financing and for logistics purposes in the context of terrorist attacks. They may use evasive methods of travel without detection, including the use of altered and counterfeit passports and visas.

## Official papers and passes

Corruption is the "enabling technology" that makes many terrorist crimes possible. For instance, two of the 9/11 hijackers allegedly obtained fraudulent driver's licences from a branch of Virginia's Division of Motor Vehicles which they then used as identity cards to board the aircraft. The same branch had also sold licenses to

illegal immigrants in exchange for bribes.<sup>4</sup> In the Bangkok bombing in August 2015, according to media reports, one of the suspects paid a bribe to enter Thailand.<sup>5</sup> Terrorists may also bribe airport personnel in order to get bombs and weapons past security systems, as seems to have been the case in the 2004 Domodedovo (Moscow) airport bombing.<sup>6</sup>

## Export controls and illegal weapons

Corruption causes a direct threat to security when it undermines weapons export controls. Export controls are enacted to protect citizens and businesses from the illegal proliferation of weapons, including weapons of mass destruction. They cover a large range of products and technologies, including "dual-use items" which have a legitimate commercial use in addition to possible military applications. To get arms across borders, smugglers may misreport the number of transferred weapons, use false documentation and conceal weapons from the authorities. Obtaining false documentation usually entails corruption of border officials who remain very vulnerable.<sup>7</sup>

Criminals, including terrorist groups, are expert at identifying and exploiting weak or poorly enforced export controls in supplier states. They may also resort to bribery to avoid export controls altogether, particularly where anti-bribery regimes are deficient and enforcement spotty. Two high profile cases involving breaches of both export controls and foreign bribery offences illustrate the practical links between the two offences. In May 2011, the BAE Systems case resulted in a consent agreement for alleged violations of both the US export control (ITAR) and anti-bribery legislation (FCPA) which culminated in a penalty of USD 79 million and USD 400 million, respectively. Similarly, in November 2013, three subsidiaries of Weatherford agreed to plead guilty for violations of both legislations and the fraudulent use of the UN Oil for Food Programme. These cases emphasise the need for a more coordinated approach and increased cooperation between authorities enforcing export control regulatory regimes and offences relating to implementation of the OECD Anti-Bribery Convention. Export companies also need to have processes in place, including internal compliance systems, which address export control risks in tandem with anti-corruption risks.

## Nuclear materials and technologies

Some experts are also concerned that corruption is increasing the risk of terrorists obtaining nuclear materials. It is highly unlikely that terrorists could build, steal, or buy a nuclear bomb, but they may try to use less sophisticated devices, for example releasing radioactive material obtained from a reprocessing plant or weapon decommissioning in a so-called "dirty bomb".

“Corruption is an important enabler. Links to organised crime on the one side and to corrupt officials on the other side facilitate financial and arms flows.”

Katherine Dixon, Transparency International at the 2017 OECD Anti-corruption and Integrity Forum

For cross-national smuggling of nuclear components, corruption is again the primary tool that criminals use to solicit help from officials. According to Louise Shelley, Director of the Transnational Crime and Corruption Center at George Mason University, "the greatest threat to post-Soviet nuclear security is no longer underpaid scientists selling their skills to the highest bidder. Much more

dangerous today are the connections between corrupt officials who have access to nuclear materials, criminal groups that already control transit networks for illegal goods, and terrorist groups that want to acquire nuclear materials".<sup>8</sup> This is where corruption endangers world peace and jeopardises global stability.

## CORRUPTION HELPS CROSS-BORDER TERRORIST FINANCING

Although awareness of corruption, organised crime and terrorist financing has been growing in recent years, the linkages and resonances between these three forms of behaviour may not be sufficiently acknowledged. UN Security Council Resolutions recognise that terrorist groups function like international criminal businesses.

The similar tactics used by criminals and terrorists to reach their separate operational objectives have been recognised in the international standards developed by the FATF to combat money laundering and terrorist financing.<sup>9</sup> These standards provide countries with a toolbox of measures related to prevention as well as to legal, law enforcement and operational issues.

If these measures are implemented effectively by countries, they will create an environment where it will be more difficult for terrorist financing, money laundering, corruption and other crimes to thrive undetected.

The fact remains that, like criminal organisations, terrorists engage in a range of activities that are greatly facilitated by corruption. Corruption happens at border points, where criminal operators offer bribes to customs officials to allow them to smuggle prohibited goods. The nature of these activities varies from country to country but can take the form of simple acts such as "turning a blind eye" to extreme acts of aiding with contraband smuggling.

Smuggling and illicit trade are long-established and profitable activities which international terror groups, crime rings and rebel guerrillas use to finance their activities.

“ Terrorists benefit from corruption and promote it in order to finance their activities, and smuggle their equipment, and to protect their networks from the eyes of security and justice. Terrorism and corruption are feeding each other.”

Ashraf Rifi, Minister of Justice of Lebanon 2014-2016 and President of the Arab Network for strengthening the integrity and the fight against corruption, 2015

Smuggling is carried out either directly by these groups or indirectly, by offering paid protection to other groups carrying out the smuggling. Terrorist organisations undertake various forms of smuggling activities to finance their operations. Many countries in Europe, Africa or South America which have been badly affected by terrorism report a direct link between the illegal drug trade, trafficking in firearms, smuggling of migrants, and terrorism. The terrorists who attacked Paris in November 2015 gunned down their victims with rifles allegedly smuggled from Eastern Europe.<sup>10</sup> Smuggling of antiques is also recognised as an important source of terrorist financing. Illicit trade can involve more banal products too, such as the illicit trade in sugar that finances Al Shabaab in Somalia.

“ Promoting development, improving governance, and cracking down on corruption will play a far more important role than preventing terrorists from using the international financial system.”

Peter R. Neumann, Professor of Security Studies and Director of the International Centre for the Study of Radicalisation and Political Violence, King's College London, 2017

Trafficking of wildlife and derived products is recognised as one of illicit trade's most profitable and attractive activities. Recent studies show how criminal organisations, including terrorists, are exploiting wildlife as a source of financing. Corruption is a key facilitator of wildlife crime and endemic in many countries identified as either a source or destination of wildlife trafficking.<sup>11</sup>

## CORRUPTION AND TERRORIST FINANCING SHARE METHODS TO HIDE MONEY

Traffickers, corrupt politicians, and terrorists need ways to raise, move, conceal and spend money. One of their main means is the use of anonymous "shell companies", defined by the OECD as "a company that is formally registered, incorporated, or otherwise legally organised in an economy but which does not conduct any operations in that economy other than in a pass-through capacity".<sup>12</sup> The only purpose of a shell company is to hide the identity of the true owner of the money passing through it, or "beneficial ownership" as it is called by tax authorities and others combating illegal financial flows and tax avoidance.

Although it is difficult to link shell companies to their owners, security experts and law enforcement officials all agree that shell companies, or other forms of legal entities like trusts, pose a threat to national security and make it nearly impossible to find the people who are actually financing terrorism and other criminal activities, and can be ideal vehicles for terrorist financing.<sup>13</sup> For instance, owners of shell companies can remain anonymous while still being able to open bank accounts, transfer money and enjoy the legitimacy of being incorporated in countries with sophisticated financial sectors. American shell companies have allegedly been used to launder money and facilitate the illegal activities of such notorious criminals as an Eastern Europe arms dealer charged with selling weapons to terrorists and a Balkan crime boss tied to the murder of his country's Prime Minister.<sup>14</sup> Hezbollah reportedly financed its activities in part by using shell companies in the US state of North Carolina to smuggle cigarettes.<sup>15</sup>

Even when criminals behind the shell companies get caught, the registered agents who help set them up are often left untouched. Many continue to make money by registering fronts for potentially dangerous criminals.

“ The beauty of shell companies is being able to hide. [...] This lack of transparency is an impediment for law enforcement and the intelligence community.”

Dennis Lormel, a former FBI special agent and expert on terrorist financing

# NATURAL RESOURCE EXTRACTION AND THE LINK WITH TERRORISM AND NON-STATE ARMED GROUPS

Terrorist networks are known to have deep operational, logistical and financial links with the production and trade of natural resources. Well known examples include oil, diamonds and gold, but numerous other mineral supply chains such as tin, talc, chromite and marble may also be involved. Terrorist organisations present in conflict-affected and high-risk areas are known to profit from the production and trade of natural resources through territorial control of areas where mines are present and through complex smuggling and finance networks.

## The pathways to profit

Terrorism profits from natural resources at multiple stages of the mineral supply chain, from mining to trading to money laundering, in the post-refinement stage.

**Mining and extraction.** Furthest upstream in the supply chain, some terrorist groups directly control and operate the mine sites or oil production sites or charge “taxes” to any operators on the site. More sophisticated terrorist groups have, through complex patronage networks, beneficial ownership in local mining companies and concessions. Terrorist organisations sometimes also issue unofficial mining and oil licences to local producers.

**Supply of goods and services for extraction and trade.** Some groups are directly involved through financing of operations, equipment or the supply of goods and services for extraction and trade (such as dredging machines and makeshift oil refineries). Financing equipment can also be a way to launder the proceeds of unrelated crimes into otherwise legal or legitimate mining activities. Terrorist groups are also known to restrict mining supplies from getting to the site if “taxes” are not paid.

**Trading.** Transportation, trade and smuggling can be very profitable when there is a high demand for a natural resource for which legal imports are heavily regulated. Terrorist groups also use their connections and territorial control to smuggle minerals/oil out of the country or levy “taxes” on smugglers. Often, the same networks used for trafficking weapons and people function as natural resource trade routes as well.

Also at the export level, terrorist organisations use their political connections and bribery to obtain fraudulent export documents and mineral origin certification documents. Terrorist groups are also known to have beneficial ownership of export and transport companies.

**Refining and sale.** Terrorist groups are also involved with introducing the illegally extracted or stolen oil/minerals into the legitimate market. Refiners may cooperate with terrorist organisations, voluntarily or otherwise, to make the natural resource suitable for trade. Terrorist connections in the black market, often in volatile border regions, then smuggle the refined or partially refined good over the border where it is sold and mixed with the legal goods.

Precious stones and precious metals are ideal for money laundering and terrorist financing due to their valuable, easily malleable,

and anonymous nature. It is common for terrorist organisations to purchase refined minerals using the proceeds of crime and then reintroduce those minerals to the market. Minerals are also used as an alternative currency in illicit transactions such as the purchase of weapons and drugs, and the mineral trade is connected to trade based money laundering (FATF, 2013 and 2015).

## Follow the money... and the materials

Governments should urgently focus on the effective implementation of the full range of laws, regulations and other measures to combat terrorist financing. The OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas is an OECD instrument that is already helping the international community to build a coordinated response to the criminal exploitation of minerals where corruption plays a central role. Building on FATF due diligence recommendations and guidance, the OECD Guidance has inspired programmes to encourage responsible mineral sourcing and combat the criminal exploitation of minerals.

The OECD Guidance is a detailed, practical set of recommendations for all businesses involved in the minerals supply chain, from extraction through production to final consumer. It helps to identify and address risks of contributing to human rights abuses and conflict/terrorist finance. First adopted in 2011, the OECD Guidance is now referenced in domestic and regional regulations in the United States, European Union, and several African countries, as well as UN Security Council Resolutions.<sup>16</sup> As a result, hundreds of companies and industry initiatives across the supply chain now implement the OECD’s due diligence framework to ensure they produce and source responsibly. Traceable 3T exports from the Democratic Republic of the Congo, Rwanda, and Burundi, for instance, increased from around 300 tonnes in 2010 to 19,500 tonnes in 2014.























The development of further sector-specific guidance of this nature could help the international community to fight the criminal trade in other minerals, including oil. In order to combat the emerging patterns of terrorist financing, due diligence needs to go beyond traditional anti-money laundering financial checks and cover the entire chain of minerals from high-risk areas, all the way up to the production site and including goods and services necessary for moving the mineral to market.



## Measures against terrorist financing need to be reinforced

“A number of traditional countermeasures used to deprive terrorist organisations of funds are not applicable with respect to the new model adopted by ISIL... Focus should be put on the identification of the origin, middlemen, buyers, carriers, traders and routes through which oil produced in ISIL-held territory is trafficked.” To overcome challenges associated with terrorist financing through natural resources exploitation, it will be necessary to consider how the public and private sectors can collaborate and include actors outside of the traditional scope of the anti-money-laundering/counter-terrorist financing regime.

Financing of the terrorist organisation Islamic State in Iraq and the Levant (ISIL), FATF (2015)  
[www.fatf-gafi.org/topics/methodsandtrends/documents/financing-of-terrorist-organisation-isil.html](http://www.fatf-gafi.org/topics/methodsandtrends/documents/financing-of-terrorist-organisation-isil.html)

Terrorist organisations and armed groups*	Region of operation	Revenue stream/resources exploited
FARC/ELN**	Colombia	Levies on mines and mining equipment in regions, particularly precious metals 
Taliban	Afghanistan	Mine capture in home region, 'service charges' in non-home regions on talc, gemstones, marble, gold and coal    
Hezbollah	West and Central Africa	Voluntary or forced donations, established mineral trading networks. Resources include gold, gemstones, uranium and coal    
ISIL/Al Qaeda	Eastern Syria, Western Iraq	Taxation of activities in controlled territories, sales from crude and refined oil and precious metals    
United Wa State Army	Myanmar	Control of regional tin mines, revenues from exports to China 
Al Shabaab	Somalia	Capture of acacia charcoal industry, exports of charcoal to Middle East   
FDLR/Mai-Mai/Raia Mutomboki	Democratic Republic of Congo	Voluntary or forced donations, established mineral trading networks     

\*It is important to note that under international law, all terrorist organisations are recognised as non-state armed groups. According to ICRC (2011), “Generally speaking, non-state armed groups are defined as distinctive organizations that are (i) willing and capable to use violence for pursuing their objectives and (ii) not integrated into formalized state institutions such as regular armies, presidential guards, police, or special forces.” For further reading on what constitutes a “terrorist organisation” under international law, see Special Tribunal for Lebanon (2011) and American Society for International Law (2011).

\*\*The Colombian government and FARC agreed to a peace deal which began taking effect on 1 December 2016. The Colombian government is currently undertaking peace talks with ELN (as of October 2017).

## OECD'S ROLE

Terrorism is a multidimensional challenge and tackling it efficiently requires integrating social, economic, and political factors into the security analysis and response. The OECD is well placed to do this in collaboration with the international community, including the G20, national authorities, civil society and other international organisations such as the FATF and the United Nations (including UNESCO on trafficking in antiques and UNCRI on organised crime aspects). The OECD is ideally positioned to maximise complementarity of effort of all parties. Because of the range of issues it deals with, the OECD already has a significant foundation to build on. The OECD has examined regional, sectoral and broader aspects of the issues, such as terrorism and conflict over resources in Africa<sup>17</sup>, the connections between terrorism and organised crime through illicit trade<sup>18</sup>, the implications for the transport industry<sup>19</sup>, and how to help fragile states.<sup>20</sup>

But more needs to be done. The first milestone should be to offer governments and relevant international bodies a trustworthy, and, where necessary, confidential platform to identify issues and share experience in dealing with the terrorism threat, its linkages with corruption, including bribery of foreign public officials, and any other illegal activities (such as illicit trade). This platform for dialogue and action will benefit from the expertise of the OECD in advising decision makers on public policy options and strategies. The OECD will also use its convening power under the OECD Anti-Bribery Convention and other business integrity instruments to bring the private sector into the discussion and joint efforts. As a starting point, the OECD can offer access to its network of law enforcement officials<sup>21</sup>, a forum open to prosecutors specialising in combating transnational crime. In particular, the network can study the connections between terrorism and corruption, terrorist financing and natural resources, as well as the challenges of cross-border exchange of information and intelligence among judicial authorities and beyond. This is an area where synergies with other international organisations such as the FATF need to be strengthened.

### OECD initiatives should address

- **Corruption and terrorist financing:** prosecutors and investigators are increasingly relying on innovative uses of anti-corruption laws not only against terrorists and authoritarian regimes, but also against companies that have assisted them. Anti-corruption enforcement equips authorities with powerful weapons to fight the financing of terrorism. Through recent investigations of multinational corporations, enforcement officials have also developed an enormous repository of information about corrupt practices. OECD leadership in promoting the fight against transnational corruption should inspire new policy responses to address the risks of terrorism as related to corruption.
- **Criminal exploitation of oil resources, corruption and terrorism:** the OECD could consolidate information on ISIL and other terrorist organisations' involvement in the production and trade of oil, outlining typologies of risk that would be relevant for due diligence along the supply chain. This work should also identify the key actors, locations, and stages in the supply and value chain and recommend actions to improve private sector due diligence to prevent terrorist financing through supply or services in oil. It should look into the particular aspect of corruption as a facilitator of illegal trade in oil resources.
- **Criminal exploitation of wildlife, corruption and terrorism:** the OECD could further explore the connections between these three phenomena, measure the value and flows of illegal trade in wildlife, highlight the shifts over time in source, transit and destination countries and identify policy gaps and remedies.
- **Corruption in export controls and the illegal export of weapons:** international instruments designed to fight bribery in international business transactions, with the OECD Anti-Bribery Convention at the forefront, are essential and powerful tools to fight corruption in exports and make national export control regimes more effective. A global and coordinated approach by governments, business and international standard setters is needed, including in the context of the G20.
- **Corruption in the police and the judiciary:** since the entry into force of the OECD Anti-Bribery Convention, countries have strengthened their capacities to investigate, prosecute and sanction transnational corruption. The Convention addresses in particular the need to preserve the law enforcement community as well as the judiciary from undue influences in high profile corruption cases. The unique experience gained by the OECD in this area should serve as the basis for future initiatives to support countries' efforts in enhancing institutional and legal frameworks to fighting corruption. The OECD integrity framework and conflict of interest guidelines also promote more integrity in police and judicial systems.
- **The misuse of companies and trusts by terrorists and other criminals:** the OECD will work with others, including the FATF, to gather further evidence and envisage mechanisms to assist national authorities and other relevant international bodies in promoting more transparency and better access to up-to-date, reliable information on the beneficial ownership of companies and trusts in order to prevent their misuse.
- **Corruption in the defence sector that harms countries' capacity to fight terrorism:** the OECD should continue to address the vulnerability of the defence sector to corruption. Preventing corruption in this sector requires strengthening the public sector entities involved, reaching out to the private sector, and promoting corporate governance and accountability. A specific focus should be put on promoting more transparency and accountability in public procurement. This is an area where the OECD's unique expertise should be more widely shared.

## NOTES

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