

# COUNTER TERRORISM POLICY

# SHREEL FOUNDATION



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## COUNTER TERRORISM POLICY

### 1. Purpose

This policy ensures that no funds, resources, or activities of Shreel Foundation are used, directly or indirectly, to support terrorism or terrorist-linked entities. It safeguards the organisation's credibility, legal standing, and donor trust by complying with all Indian laws and international obligations on counter-terrorism. It also establishes verification, monitoring, and reporting mechanisms for all employees, volunteers, donors, partners, and projects.

### 2. Scope

This policy applies to all employees, volunteers, board members, vendors, donors, and partner organisations working with Shreel Foundation. It covers all projects, both domestic and international, and all financial transactions including CSR and foreign contributions.

### 3. Abbreviations

- **UAPA** – Unlawful Activities (Prevention) Act, 1967
- **PMLA** – Prevention of Money Laundering Act, 2002
- **FCRA** – Foreign Contribution (Regulation) Act, 2010
- **MHA** – Ministry of Home Affairs, Government of India
- **UNSC** – United Nations Security Council
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### 4. Related Policies and Forms

- Funding Policy – Ensures transparent use of funds.
- Capital Funding Application Form (Shreel Foundation)
- Recurrent Funding Application Form (Shreel Foundation)
- Annual Acquittal Reports (Domestic & Foreign-funded Projects)

## 5. Shreel Foundation's Commitment

5.1 Shreel Foundation is a not-for-profit organisation registered under the Societies Registration Act, 1860, which recognises the risk of misuse by individuals or organisations to support terrorist activities, particularly when working with multiple partners, donors, and projects. This risk increases if the Foundation does not ensure strict due diligence and monitoring of all entities and projects it engages with.

5.2 This Counter-Terrorism Policy ensures that all funds, donations, and resources managed by Shreel Foundation are not used, directly or indirectly, to support any terrorist organisation or activity. It provides clear procedures for verification, monitoring, reporting, and immediate action if any suspicious links are identified.

5.3 Shreel Foundation complies with the following Indian and international legal frameworks:

- Unlawful Activities (Prevention) Act (UAPA), 1967 (as amended)
- Prevention of Money Laundering Act (PMLA), 2002
- Foreign Contribution (Regulation) Act (FCRA), 2010 (for projects receiving foreign contributions)
- Reserve Bank of India (RBI) KYC and Anti-Money Laundering Guidelines
- Ministry of Home Affairs (MHA) Notifications and List of Banned/Proscribed Organisations
- United Nations Security Council Resolution 1373 (2001) and UNSC Sanctions Lists

5.4 Shreel Foundation renounces all forms of terrorism and will never knowingly support, tolerate, or facilitate any activity or individual associated with terrorism. The Foundation ensures that all partners, employees, donors, and vendors are screened against the MHA and UNSC sanction lists, and that all financial transactions are transparent, documented, and traceable through recognised banking channels.

5.5 Failure to comply with these requirements will result in:

- Immediate suspension of partnership, funding, or employment with the concerned entity or person.
- Mandatory reporting to law enforcement agencies, the Ministry of Home Affairs (MHA), and the Financial Intelligence Unit (FIU-IND).
- Possible legal prosecution, cancellation of registrations (including 12A, 80G, FCRA), and reputational penalties for Shreel Foundation.

## 6. Policy

6.1 Shreel Foundation will not engage, contract, or transact with any individual or entity listed as a proscribed organisation by the MHA, RBI, or UNSC Sanctions List.

6.2 The Foundation will verify the identity, registration, and credibility of all donors, vendors, and partners through PAN, Aadhaar, GST, FCRA (if applicable) and government-provided sanction lists.

6.3 No funds will be remitted or received in cash beyond permissible limits. All financial activities will pass through RBI-regulated banking channels.

6.4 Any suspected link to terrorism will be immediately reported to law enforcement, MHA, and FIU-IND, and all dealings will be suspended.

## 7. Responsibilities

- **Board of Shreel Foundation:** Reviews and approves the policy annually; ensures compliance with legal and donor standards.
- **Secretary (Rakesh Verma):** Implements the policy across all departments and partnerships.
- **Finance Team:** Conducts KYC, verifies all partners/donors, monitors transactions, and prepares annual compliance reports.
- **Project Managers:** Ensure all project proposals and agreements include risk assessment and anti-terrorism clauses.

## 8. Procedures

### 8.1 KYC & Verification:

- Verify identity and registration of all partners, donors, and vendors.
- Screen against MHA banned list (<https://www.mha.gov.in>) and UNSC Sanctions List.

### 8.2 Funding Agreements:

- Include clauses mandating compliance with UAPA, PMLA, and FCRA.
- Require annual audited financial reports from all funded partners, certified by a recognised chartered accountant.

### 8.3 Monitoring & Audits:

- Internal audits every six months.
- Annual external audit confirming lawful use of funds.

### 8.4 Incident Handling:

- Immediate suspension of funds and termination of MoUs if a partner/entity is found linked to terrorism.
- Mandatory reporting to police, MHA, FIU-IND.

## 9. Definitions

- **Terrorist Act (as per UAPA):** Any act using weapons, explosives, or other means to threaten the unity, integrity, security, or sovereignty of India, or to strike terror in people, causing death, injury, property damage, or disruption of essential services.
- **Terrorist Offence:** Planning, funding, supporting, training, or facilitating any act that qualifies as a terrorist act, even if not executed.
- **Proscribed Organisation:** Any group listed by the MHA or UNSC Sanctions List as banned or restricted.

*Approved by*  
**Secretary, Shreel Foundation**  
*Dated: 21.05.2024*