



COUNTER-TERRORISM POLICY

APPLICABILITY	:	(See Scope)
VERSION	:	(April 2025)
WILL BE AUTHORISED BY	:	(BOARD)
SCHEDULED REVIEW DATE	:	(April 2027)

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INTRODUCTION

Vision Rescue (hereafter also referred to as "the Organization") is committed to promoting peace, providing humanitarian assistance, and supporting vulnerable populations in line with its mission. The Organization recognizes the importance of preventing the misuse of its resources and efforts for terrorist activities.

As a non-for-profit, we recognise that terrorist organisations or individuals may seek ways to use finances to support terrorist activities, with or without people's knowledge. In a charitable setting, this may include:

- Using charity funding.
- Using charity assets.
- Using the charity's name and status.
- Cleaning money through charities.
- Committing financial abuse within a charity; and
- Setting up a charity for an illegal or improper purpose.

For this reason, Vision Rescue seek to have policies and clear risk management procedures in place to ensure that every reasonable effort is made to minimise the risk of any inadvertent association with terrorist individuals, organisations or acts.

PURPOSE

The primary objective of this policy is to protect the Organization and its staff, volunteers, beneficiaries, and partners from any involvement in terrorist activities. This includes compliance with the provisions set forth by the Government of India under the Unlawful Activities (Prevention) Act (UAPA) and international frameworks like the UN Security Council Resolutions on counter-terrorism. This Counter-Terrorism Policy aims to outline the steps taken to ensure that the Organization adheres to relevant laws, including Indian laws and international counter-terrorism regulations, and to ensure that its operations do not inadvertently support or fund terrorism.

SCOPE

This policy refers to everyone in the Vision Rescue and associated personnel, beneficiaries from communities regardless of position or status.

This policy applies to following Vision Rescue's Stakeholders defined below.

- All Vision Rescue's Staff, Contractors and Consultants.
- All Vision Rescue's Agents.
- All Vision Rescue's Volunteers and/or Interns.
- All Vision Rescue's Board Members.

RESPONSIBILITY

The Organization will take necessary steps to ensure that none of its activities—whether related to funding, operations, or partnerships—are directly or indirectly linked to terrorist organizations or individuals.

All stakeholders mentioned in the scope of this policy are responsible for making sure that they identify and disclose any concerns, and are in general responsible for the effective implementation of this policy.

DUE DILIGENCE AND VETTING PROCEDURES

The Organization shall implement robust vetting procedures for all individuals and entities involved in its operations. This includes:

- **Background Checks:** All employees, volunteers, contractors, partners, and donors will be screened to ensure they are not linked to terrorist organizations, as defined by Indian law and international regulations.
- **Verification of Partners:** All partners, including local and international organizations, shall be subject to a thorough due diligence process. This will include checking against government and international terrorism watchlists such as the UN Sanctions List and the Indian Ministry of Home Affairs (MHA) database.
- **Donor Screening:** The Organization will vet all donors to ensure their funds are not misused for terrorism-related purposes, following India's Prevention of Money Laundering Act (PMLA) and other applicable regulations.

RISK ASSESSMENT AND MONITORING

- **Risk Identification:** The Organization will assess potential risks related to terrorism, especially in regions where it operates in conflict zones or high-risk areas. This includes evaluating political, social, and security risks that may expose the Organization to exploitation by terrorist groups.
- **Ongoing Monitoring:** The Organization will continuously monitor the security and political environment of its operating regions and adjust its risk assessments and operations accordingly.
- **Threat Intelligence:** The Organization will remain vigilant and share relevant information with local authorities or security agencies if it identifies any potential terrorist-related risks.

TRAINING AND AWARENESS

- **Staff and Volunteer Training:** All staff, volunteers, and partners will undergo regular training to recognize signs of terrorism-related activities and to understand their responsibilities under this policy. The training will also include information on India's UAPA and international counter-terrorism laws.
- **Refresher Courses:** Periodic refresher training will be conducted to keep staff and stakeholders updated on evolving counter-terrorism laws, risks, and organizational best practices.

COMPLIANCE WITH LAWS AND REGULATIONS

- **Indian Laws:** The Organization will adhere to India's counter-terrorism laws, including the Unlawful Activities (Prevention) Act (UAPA), the Prevention of Money Laundering Act (PMLA), and other relevant national regulations.
- **International Standards:** The Organization will comply with international counter-terrorism regulations, including UN Security Council Resolutions related to sanctions and anti-terrorism financing.

- **Cross-Border Operations:** As an Implementing Agency for the projects supported under FCRA, The Organization, will ensure compliance with counter-terrorism regulations in each jurisdiction, including applicable laws from donor countries.

REPORTING SUSPICIOUS ACTIVITIES

- **Confidential Reporting Channels:** The Organization encourages its staff, volunteers, partners, and any other stakeholders to report any suspicious activities related to terrorism through a confidential reporting mechanism. These reports will be handled with the utmost seriousness and confidentiality.
- **Whistleblower Protection:** The Organization guarantees protection from retaliation for individuals reporting any concerns or suspicious activities. Reports can be made anonymously if preferred.
- **Investigation Process:** All reports will be promptly investigated, and appropriate actions will be taken, including reporting the matter to law enforcement or relevant authorities if necessary.

PROHIBITION OF SUPPORT FOR TERRORISM

- **Zero Tolerance:** The Organization has a zero-tolerance policy regarding any support for terrorism. This includes:
 - Financial support, material assistance, or any other form of aid to terrorist groups or individuals.
 - Indirect support through third parties or local intermediaries.
- **Ineligibility for Engagement:** Any individual or organization identified as having connections to terrorist activities will be immediately disqualified from receiving funding, collaboration, or any other form of assistance from the Organization.

INTERNAL AUDITS AND MONITORING COMPLIANCE

- **Regular Audits:** The Organization will conduct regular internal audits to ensure compliance with this Counter-Terrorism Policy. The audits will assess financial transactions, vetting procedures, and adherence to reporting and monitoring mechanisms.
- **External Audits:** The Organization will also cooperate with external auditors if required, especially in relation to donor-funded projects or large-scale international operations.
- **Documentation and Record-Keeping:** All transactions, partnerships, and contracts will be documented and securely maintained for auditing purposes.

SANCTIONS FOR NON-COMPLIANCE

- **Disciplinary Actions:** Any violation of this policy, including involvement in terrorist-related activities or failure to comply with due diligence procedures, will result in disciplinary action, which may include termination of employment, partnership, or collaboration, and reporting the matter to law enforcement or relevant authorities.
- **Legal Action:** In cases where a violation involves illegal activities, the Organization will cooperate fully with law enforcement and report the matter to relevant authorities in accordance with Indian and international laws.

- Termination of Relationships: Any individuals, organizations, or entities found to be associated with terrorism will be immediately removed from the Organization's operations and will no longer be eligible for support, funding, or collaboration.

REVIEW AND UPDATE

This policy will be reviewed annually and updated as needed to ensure that it remains compliant with changing laws and regulations and adapts to evolving risks. The Organization's leadership is responsible for ensuring that the policy is enforced and that all staff and stakeholders are familiar with it.

CONCLUSION

This Counter-Terrorism Policy demonstrates Vision Rescue's commitment to preventing terrorism and ensuring that its operations remain ethical, legal, and transparent. The Organization will continue to prioritize the safety and well-being of its beneficiaries, staff, and partners while operating in full compliance with the law

ANNEXURE A

ACKNOWLEDGEMENT

I, the undersigned, as the Board of Directors / Executive Leadership / Employee / _____ named below understand the points laid out in this policy, including my duty to disclose any known or potential risks.

I, the undersigned, as the Board of Directors / Executive Leadership / Employee / Consultant / _____ agree to abide by the procedures outlined in this policy.

Stakeholder Name

Relationship with Vision Rescue /Designation

Signature

Date