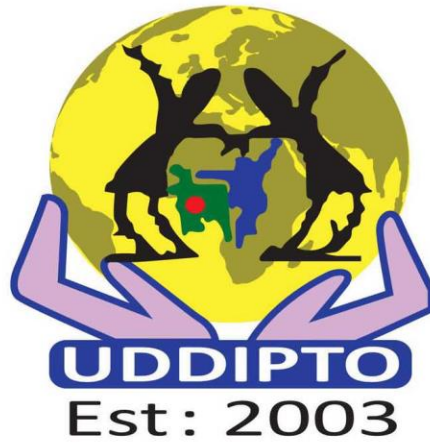


Anti-terrorist policy



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Policy Transmittal Form

Title of the policy : Anti-terrorist Policy
Policy version : 1st revision
Prepared by : Management Team, UMUS
Facilitated by : Manusher Jonno Foundation (MJF)
Under WVLB project supported by GAC
Reviewed by : Executive Director,
UMUS

Approved by : Executive Committee, UMUS

Jayonti Rani Mondal
Chairperson, Executive Committee
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Date of approval : Novembe 12, 2022

Endorsed by : ED, UMUS

Shamoly Das, ED, UMUS

1. Anti-terrorist financing policy

Introduction

UMUS is committed to promote human rights and good governance in Bangladesh through partnership with different donors & NGOs. To consider the present context and address ongoing practical situation, UMUS management feel necessity to develop an anti-terrorism policy which will help UMUS to avoid the stain of terrorism in future project implementation. UMUS renounces all forms of terrorism and will never knowingly support, tolerate or encourage terrorism or the activities of those who embrace terrorism and will make every effort to ensure that its resources are not used to facilitate terrorist activities.

1.1 Objective of this policy

This policy is a supporting tool which will help UMUS to watch whether any concerned staff, department, project, partner, stakeholder, suppliers are getting involved knowingly or unknowingly with terrorism activities. This policy is also sets out UMUS's response to the risk of dealing with individuals and organizations associated with terrorism and Bangladesh Government legislation associated with this. Relevant legislation in Bangladesh can be found in:

- 1.1.1 The Anti-Terrorism Act, 2009 which came into force on 11 June, 2008. (Amended in 2013) failure to comply with Government requirements could have significant impact on the reputation of UMUS as well as expose organization to potential penalties. Therefore, First UMUS will follow the related Acts, Laws, and rules of Bangladesh Government, secondly donors' rules and regulations. UMUS does not remit funds overseas; the risk of dealing with terrorist organizations is diminished. Nevertheless, it is important that the requirements of this policy be observed whenever funds are to be remitted overseas.
- 1.1.2 UMUS acknowledges that Bangladesh Government legislation prohibits dealing with listed terrorist organizations and/or proscribed persons or entities. UMUS will at all times adopt measures intended to facilitate compliance with this legislation.
- 1.1.3 UMUS will confirm the identity, credentials and good standing of the people or organizations it supports. UMUS will seek to ensure that none of the funds or assets provided under this arrangement are made available or used to provide support to individuals, groups or entities associated with terrorism including those named on the following lists as updated from time to time:
 - HM Treasury's Office of Financial Sanctions Implementation – Financial sanctions: consolidated list of targets

- UK Home Office – Proscribed terrorist groups or organizations
- European Union – Consolidated list of sanctions
- United Nations – United Nations Security Council Sanctions List
- World Bank – World Bank Listing of Ineligible Firms & Individuals

1.1.4 UMUS will not knowingly provide any funds or issue any work order or assignment to known or suspected terrorist organizations or individuals.

1.1.5 UMUS will report any known or suspected terrorist links to the relevant counter terrorism national authority of Bangladesh Government.

1.2 Responsibilities

EC of UMUS is committed to compliance with Bangladesh anti-terrorism legislation to avoid dealing with individuals and organizations associated with terrorism.

Executive Director will be responsible for ensuring that employees of UMUS carry out the following procedures at least annually to minimize the risk of dealing with terrorist organizations or individuals.

1.3 Processes

UMUS staff members must know the identity, credentials and good standing of their partners and recipient organizations (i.e. what they do, where they operate, who are their key decision makers and staff).

A checklist to be filled up by the assessment team as a part of due diligence check before transferring the fund to the selected Organization.

Care will be taken to only transmit funds from UMUS using reputable and Govt. recognized banks for this purpose.

Prior to funding any organization, details of funded entities and their office bearers will be compared to the above-mentioned lists of terrorist and proscribed organizations. Where recipient organizations or individuals are found to be on either list, forwarding funds will cease and the national security/counter terrorism unit will be informed immediately.

1.4 Related documents

1.4.1 UK Government - Compliance Toolkit: Protecting Charities from Harm, found at: <https://www.gov.uk/government/collections/protecting-charities-from-harmcompliance-toolkit>.

1.4.2 Anti-terrorism Act 2009 Bangladesh: https://www.satp.org/satporgtp/countries/bangladesh/document/papers/AntiTerrorism_Act2009.pdf.

1.5 Anti-terrorism Checklist

Serial	Area covered	Comments/status
1	Is there any instance of being arrested any of the staff, EC members in charge of terrorist activities. What was the Consequences?	
2	Was there any news on the organization or any individual, or activities of the organization relating to any kind of terrorism?	
3	Was there any meeting or communication with the terrorist group from the organization or the concerned individual?	
4	Were there any issues raised against the organization in the mass people/Govt. or in media regarding financing to any terrorist group/individual or entity?	
5	Whether any record found in the System Award Management (SAM) checking?	

-: The End :-