



EFICOR'S **Counter-Terrorism** **Policy**

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Applicability	All EFICOR Stakeholders
Revision date of the policy	15 th March 2025
Recommended by	Governance Standing Committee
Approved by	EFICOR Board
Planned Review Date	15 th March 2028

Counter Terrorist Procedures

Introduction

EFICOR is committed to ensuring that its operations, funds, and resources are not misused for terrorism-related activities. This policy aligns with national and international counter-terrorism laws to safeguard our mission, beneficiaries, and stakeholders.

Legal Framework

This policy complies with:

- The Unlawful Activities (Prevention) Act, 1967 (UAPA)
- The Prevention of Money Laundering Act, 2002 (PMLA)
- The Foreign Contribution (Regulation) Act, 2010 (FCRA)
- The Indian Penal Code (IPC)
- United Nations Security Council (UNSC) Resolutions on counter-terrorism

Scope

This policy applies to all employees, board members, volunteers, consultants, and donors.

Prohibited Activities

EFICOR strictly prohibits:

- Direct or indirect support to terrorist organizations or individuals involved in terrorism.
- Use of organizational funds, materials, or resources for extremist activities.
- Engagement with entities listed under UAPA, UNSC, or any other government watchlists.
- Dissemination of materials that promote radicalization or extremist ideologies.
- Financial transactions with unidentified or suspicious entities.

Due Diligence and Risk Assessment

To mitigate risks, EFICOR will:

- Conduct background checks on employees, partners, and donors.
- Screen financial transactions and donations for compliance with PMLA and FCRA regulations.
- Verify beneficiaries and ensure no engagement with blacklisted entities.
- Regularly update risk assessments and internal control mechanisms.



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Staff recruitment

1. EFICOR asks for reference from at least two people about the candidate to be recruited as staff of EFICOR with the following procedure.
 - a. A written reference from the referee.
 - b. A written reference in EFICOR's prescribed format from the referee as given in the annexure.
 - c. A telephonic confirmation from the referee on the written statement.
2. During the interview process, the candidate's background will be checked for any unlawful activity carried in the past or have been convicted for any criminal offence in the court of law. The candidate has to give a self-declaration that he / she does not have any criminal record in the past.
3. Appraisal of the staff reviewed by Management annually on their conduct.

Partner profile:

EFICOR partner with organizations that have complied with the government rules and regulations as required for a NGO to do.

1. Filing of IT returns on time as per IT Act, 1961.
2. Assessment Order received from the IT Office to confirm that the fund was used for charitable purpose only. (Complied with Sec 12A exemption of IT Act 1961).
3. Monitoring visits to the partner office / project locations to ensure that the work has been undertaken as per the MoU signed between EFICOR and the partner. This will include observation of other source of funding and its origin.
4. A declaration from the partner that the fund was not used for any anti-social or terrorism related activities annually.

Fund receivable:

1. In the FCRA account foreign currency grants will not be credited to EFICOR account, until it is supported by the donors' communication, which clearly states that, the fund to be utilized for charitable purpose.
2. EFICOR does not receive funds from organizations who either exploit the poor or use unethical means to raise funds.
3. As per government regulation no anonymous funds above Rs. 1.00 Lac or 5% of donations can be received by EFICOR.

Fund Utilization:

1. EFICOR utilizes the funds for charitable purposes only.
2. EFICOR avoids cash transfer (within the prescribed limit of the law of the land) to beneficiaries, in normal course.
3. EFICOR ensures that selection of beneficiaries are undertaken through proper survey, and with the concurrence of local authorities and where possible with the knowledge of the local government officials.
4. EFICOR ensures that the support provided to the beneficiaries is utilized

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only for the purpose of culture, economic, social and health development of the communities, which is spelt out in the proposal.

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Staff Safety and Security Policy

Some of the procedures written in Staff Safety and Security Policy which are related with Terrorism are given below:

N. Involvement with Arms

EFICOR staff must not carry or take up arms or weapons under any circumstances and must not use or hire armed personnel either directly or indirectly. Arms and armed personnel must not be allowed in EFICOR premises or vehicles, except if staff are threatened or coerced. Permission to use or hire armed personnel (either directly or indirectly) may only be granted by the Executive Director on a case by case basis.

Carrying weapons may also increase the risk of violence, since someone with a weapon can be seen by armed groups or individuals as a threat, and since a weapon may be taken from the staff and used against the staff. Remember that a cosh, machete or stick is also a weapon.

Staff should never handle a weapon, even if simply offered the chance to hold one for a few seconds. All kinds of firearms, guns, mines, grenades etc. can fire or explode if not correctly handled by a trained person. A photograph of a staff member holding a weapon could be used to damage the reputation of EFICOR in the local community.

O. Involvement with Armed Forces

EFICOR should only undertake work involving links with armed forces when it can be done without undermining our identity as an independent humanitarian actor. Guidance must be sought from the HRD Unit in specific cases of potential involvement, and a decision will be taken by the HR staff who will consult with the respective Director where this involves wider implications for the organization's identity.

R. Kidnapping

Humanitarian staff are unfortunately sometimes at risk of kidnap. They may be kidnapped for several reasons including:

1. To hold for ransom.
2. To cause a political effect or achieve publicity.
3. To be used as human shields.

EFICOR's policy is that ransom will not be paid in any circumstances in case of kidnap, nor will EFICOR engage in any political bargaining.

If kidnap occurs, Headquarters should immediately set up a crisis management team. Concern line Director has responsibility for managing the incident (Referred to in this section as the Incident Manager).



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The Incident Manager should consider the following actions, depending on the circumstances and his or her assessment of the best course of action:

1. Inform the local police and other appropriate authorities.
2. All communication, including with the kidnappers, government authorities, or the media needs to be strictly coordinated with one person responsible for all communications.
3. Inform all relevant parties of the name and contact details of the Incident Manager.
4. Request that no action be taken in relation to the incident without prior agreement with him or her.
5. Decide whether to negotiate directly with the kidnappers or to use an intermediary and whether to call in specialist advice, either from the police or from a reputable company specialising in hostage negotiations.

DECLARATION OF COMMITMENT

To be signed by all EFICOR staff (regular, contracted and project) and volunteers. A copy will be kept on file at the appropriate EFICOR office or personnel file.

I declare that:

1. I have read and understood EFICOR – Counter Terrorism Policy.
2. I will work within the procedure as laid out in EFICOR – Counter Terrorism Policy.

Name: _____

Signature: _____

Date: _____