

## **HAI Anti-Terrorism and Anti-Money Laundering Policy**

Humanitarian Aid International (HAI) is committed to actively combating terrorism and promoting peace, security, and the protection of human rights in India. This policy outlines our approach to prevent and address terrorism-related activities internally within our organisation and externally through our programmes and partnerships. We will adhere to all applicable laws and regulations, including but not limited to the Unlawful Activities (Prevention) Act, 1967 (UAPA), as well as relevant local and international legislation and applicable United Nations Security Council resolutions, while upholding our organisational values.

Consistent with local and international legislation and applicable United Nations Security Council resolutions, both HAI and our Partnering organisations are firmly committed to the international fight against terrorism. HAI's policy is to ensure that none of its funds are used to support individuals or entities associated with terrorism and that HAI staff and its programme activity are compliant with counter-terrorist financing legislation. By this policy, HAI expects the Partner to make themselves aware of and comply with their obligations under the relevant counter-terrorist financing legislation applicable to them.

HAI does not tolerate fraud and corruption and is committed to ensuring that its systems, procedures, and practices reduce the risk of occurrences to an absolute minimum. Fraud and corruption comprise acts of fraud, theft, bribery, nepotism, money laundering, terrorism financing, abuse of an undeclared conflict of interest, counterfeit money, cybercrime, extortion, and other forms of financial crime. Suspected or actual cases will be vigorously, and promptly investigated and appropriate action will be taken including reporting to authorities. We will make changes according to the findings of investigations and reviews and incorporate risks arising from such investigations into our strategic risk management. Failure by any member of staff or volunteer to follow this policy may be treated as a disciplinary matter and may result in disciplinary actions including dismissal.

HAI acknowledges that it is important to ensure that the funds are not misdirected to terrorist organisations or for violent activities, in accordance with the Unlawful Activities (Prevention) Act, 1967 (UAPA). HAI agrees that it will not use funds for any such purposes and that it will take care to ensure the funds over which it has control are not misdirected to such purposes. If the purpose of the grant includes giving funds to organisations other than HAI, then HAI will provide donors with the names and addresses of organisations to which HAI currently provides or proposes to provide funding, services or material support.

This policy is intended to guide our organisation's actions and ensure our commitment to combating terrorism while upholding human rights, promoting peace, and fostering a secure environment within India. It is the responsibility of all staff members, volunteers, and stakeholders to adhere to this policy and actively contribute to its implementation.

### **Policy on Stakeholder Engagement and Due Diligence**

HAI is committed to ensuring thorough due diligence and background verification before formally engaging with any stakeholder, including partners, vendors, or employees. This process ensures that none of the stakeholders are associated with entities involved in activities such as terrorism or money laundering. Any concerns identified during the background checks

will be promptly addressed in line with HAI's compliance protocols.

### **Due Diligence Requirements**

As part of the due diligence process, stakeholders must provide the following documents:

- Registration certificates of the organization.
- Copies of 12A and 80G certifications (for applicable organizations).
- Complete financial records, including the latest balance sheet.
- KYC documents of the organization/Vendors and its key representatives.

### **Responsibilities for Verification**

HAI's Head of Finance will be responsible for verifying the submitted documents and ensuring adherence to HAI's due diligence standards. Any discrepancies or concerns identified during the verification process will be escalated and resolved in accordance with HAI's established compliance framework.

**HAI will immediately report to relevant authorities if any information pertaining to anti-terrorism or money laundering comes to its notice.** Any suspected violations or concerns raised by staff, volunteers, or stakeholders will be promptly escalated to the relevant authorities for investigation and action.

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### **Contact Person Responsible:**

For any queries or reports related to this policy, please contact:

**Mr. Atma Prakash**

**Position/Role:** HAI Head of Finance

**Email Address:** [finance@hai-india.org](mailto:finance@hai-india.org)

This position is responsible for overseeing the implementation of the Anti-Terrorism and Anti-Money Laundering Policy, ensuring compliance, and addressing any concerns related to potential violations of this policy.

### **Policy Review and Finalization**

- Date of Last Review: 26 December 2024
- Date of Finalization: 26 December 2024
- Reviewed and Approved By: Programme Committee – HAI Board
- Next Review Date: 01 April 2025