

ANTI-TERRORISM POLICY
of
Trinamul Unnayan Sangstha



Trinamul Unnayan Sangstha

Marma samsad building (1st floor),
Pankhaiyapara, Khagrachari-4400

A handwritten signature in black ink, appearing to be "Akmal", is written over the blue text of the General Secretary's name.

General Secretary
Trinamul Unnayan Sangstha

A handwritten signature in black ink, appearing to be "Shabana", is written over the blue text of the Chairperson's name.

Chairperson
Trinamul Unnayan Sangstha

1. Introduction

Trinamul Unnayan Sangstha (TUS) is a non-governmental organisation, working for community development with a vision *'to establish a society based on the values of social justice, equity and freedom, in which all people have full and effective participation in the development process'* and mission *'to toward achieving the mission 'To build up the capacity of grassroots communities, especially the disadvantaged and marginalized communities of the Chittagong Hill Tracts, towards improving their livelihoods and addressing other socio-economic issues in a participatory approach'*.

To carry out the development activities TUS management feels necessity to develop an anti-terrorism policy to avoid the stain of terrorism in implementation of project activities in future. TUS 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. This policy shall be called as the **'Anti-terrorism policy of Trinamul Unnayan Sangstha'**.

2. Objectives of this policy:

This policy is a supporting tool which will help TUS 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 TUS'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:

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 TUS as well as expose the organization to potential penalties.

Therefore, First TUS will follow the related Acts, Laws, and rules of Bangladesh Government, Secondly- United Kingdom (UK) aid restrictions, Part 4 of the Charter of United Nations Act 1945 ('the UN Charter Act') and then other rules and regulations.

TUS 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.

3. Procedures

3.1 TUS acknowledges that Bangladesh Government legislation prohibits dealing with listed terrorist organizations and/or proscribed persons or entities. TUS will at all times adopt measures intended to facilitate compliance with this legislation.

3.2 TUS will confirm the identity, credentials and good standing of the people or organizations it supports. TUS 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

3.3 TUS will not knowingly provide any funds to known or suspected terrorist organizations or individuals.

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

4. Responsibilities

4.1 The TUS Board is committed to compliance with Bangladesh anti-terrorism legislation to avoid dealing with individuals and organizations associated with terrorism.

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

5. Processes

5.1 TUS 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).

5.2 A checklist (*Annex-1*) to be filled up by the assessment team as a part of due diligence check before transferring the fund to the selected Organization.

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

5.4 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.

6. Related documents

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

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



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Anti-Terrorism Checklist

Name of PNGO/Vendors:

Period Covered:

From

To


Areas Covered	Comments/Status
1. Is there any instance of being arrested any of the Board members in charge of terrorist activities. What 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. There was 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	

Prepared By: _____

Name:

Position:

Date:


General Secretary
Trinamul Unnayan Sangstha


Chairperson
Trinamul Unnayan Sangstha