UFUK
İnsani Yardim Derneği

UFUK ASSOCIATION FOR RELIEF AND DEVELOPMENT

Anti-Terrorism Policy

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1. INTRODUCTION AND PURPOSE

UFUK Association for Relief and Development is committed to conducting its humanitarian aid and development projects in accordance with the highest ethical and legal standards. This policy outlines the Association's zero-tolerance approach to terrorism and the financing of terrorism (CTF). Our goal is to ensure that none of our activities support, are associated with, or are used as a tool for terrorist activities. This policy is designed to ensure the Association fulfills its legal and moral obligations and maintains credibility with its stakeholders.

2. LEGAL FRAMEWORK AND COMPLIANCE

This policy has been developed in line with the laws of the Republic of Türkiye as well as international legal frameworks and standards. Key legal references include:

- Law No. 6415 on the Prevention of Financing of Terrorism
- Law No. 5549 on the Prevention of Laundering Proceeds of Crime
- Relevant United Nations Security Council (UNSC) resolutions and sanction lists
- Financial Action Task Force (FATF) recommendations
- International sanctions regimes including those of the European Union (EU) and the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC)

3. SCOPE OF THE POLICY

This policy applies to the Association's board members, all employees (full-time and part-time), volunteers, consultants, suppliers, project partners, and all individuals and institutions providing financial support. Each stakeholder is required to be informed of and comply with the contents of this policy.

4. CORE PRINCIPLES

- **Zero Tolerance:** A strict and uncompromising stance is taken against terrorism and terrorist financing.
- **Risk-Based Approach:** Projects, operational regions, target groups, and partners are regularly assessed for CTF risks.
- **Due Diligence:** Comprehensive due diligence processes are carried out for all stakeholders and operations.
- **Transparency and Accountability:** All financial transactions are documented, reported, and made auditable in a transparent manner.

- **Training and Awareness:** Continuous information and awareness on CTF is ensured for all relevant staff.

5. DUE DILIGENCE AND SCREENING (VETTING) PROCESS

This process applies to all individuals and organizations collaborating with the Association:

- **Stakeholder Screening:** New personnel, volunteers, suppliers, donors, and project partners are regularly screened against national and international sanction lists, such as those from the UN, EU, U.S. OFAC, and Türkiye's MASAK.
- **Compliance Check:** A comprehensive "Compliance Check Form" (Due Diligence Form) is completed for each new partnership. The form includes detailed information on the entity's background, governance, and financial resources.
- **Risk Assessment:** Additional in-depth research is conducted for projects in high-risk regions or for suspicious donations.

6. FINANCIAL MANAGEMENT AND CONTROL

All financial operations of the Association are managed to minimize CTF risks.

- **Financial Monitoring:** All income, expenditures, donations, and spending categories are tracked and recorded on a project basis.
- **Dual-Control Principle:** All financial transactions are subject to verification and approval by at least two authorized personnel.
- **Documentation:** Each financial transaction is supported by related documents (invoices, receipts, bank statements, etc.) and archived for a minimum of 10 years.
- **Suspicious Transaction Reporting:** Any suspicious transaction is promptly reported to the Financial Crimes Investigation Board (MASAK).

7. PROJECT AND FIELD MONITORING

Strict field controls are implemented to ensure aid reaches the rightful recipients.

- **Beneficiary Verification:** All personal details of beneficiaries are accurately recorded in project documentation. Beneficiary lists are regularly updated and subjected to risk assessments.
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- **Distribution Oversight:** Aid distributions are conducted under the supervision of independent observers or monitors, and the process is documented through photos, videos, or other visual materials.
- **Monitoring and Evaluation:** Post-distribution monitoring is conducted to ensure aid is used appropriately and for its intended purpose.

8. TRAINING AND AWARENESS

- **Mandatory Trainings:** Annual mandatory trainings are provided to all staff and volunteers on this policy and CTF standards. These trainings are updated to include the latest risks and legal changes.
- **Orientation Program:** All new staff and volunteers receive a briefing on the importance and implementation of this policy during their onboarding process.

9. VIOLATIONS AND SANCTIONS

In case of non-compliance or deliberate violation of this policy, the Association's internal disciplinary processes are immediately initiated. Depending on the nature of the violation, actions may include

contract termination, ending of partnership, or reporting to relevant authorities and initiating legal procedures.

10. REVIEW AND UPDATE OF THE POLICY

This policy is reviewed annually in line with changes in legal regulations, international standards, and operational needs of the Association. Updates are approved by the Board of Directors and communicated to all stakeholders.

Sincerely,

The Board of Directors and Legal Team of UFUK Association for Relief and Development

For detailed questions, please contact,

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