



April 30, 2019

The Governing Body,
Waste Warriors Society,
24 – Pritam Road,
Dehradun – 248 001

Reg. : FCRA Audit for the Financial Year 2018-19

Dear Sir(s),

We would like to apprise you that post our appointment as FCRA Consultants in August 2018 and series of discussions with your accounts staff from time to time, all compliances in regard to the filing of returns for the financial year have been completed. All the quarterly returns for the financial year have been filed and the acknowledgements are attached herewith for records.

We had submitted a note on FCRA Compliances and Regulatory Issues sometime in November for the accounts team to follow. The advise therein was broadly as under -

1. The designated bank account be updated on a regular basis preferably with online access.
2. The foreign contributions received in the designated account be identified and a letter for such contribution be obtained from the donor, which should specify the purpose for which the donation is made along with the complete address of the donor.
3. In case of foreign contribution received in kind, the same be recorded in a separate register maintained for such purposes encapsulating the items received with their quantity, complete name and address of the donor.
4. All interest earned/accrued for investments made out of foreign contributions should be treated as foreign contribution

The SOP for compliances under the FCRA, 2010 were advised as under –

While one part of the compliances relates to receipts into the designated bank account and their quarterly reporting, the other part relates to the application of the receipts. Like in case of all compliances the documentation and timely filing of returns is the key to be compliant with the provisions of FCRA, 2010. The recommendations on the receipt front have been enunciated at point 1 to 3 above, we recommend the following on the application of receipt.





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Chartered Accountants

1. The funds should be disbursed directly for the project and no interim bank account of the organization should be used to make such disbursements.
2. Proper paper trail for application of the funds should be maintained clearly mentioning the project for which the funds are used.
3. The application of funds should be in line with the mandate given by the donor in case of specific donations.
4. The disbursement of funds should be made by authorized person of the organization.
5. In case more than one project (location/object) is being carried out by the organization, a separate income expenditure may be maintained for each such project in order to have complete transparency and control over the execution of such projects.

We had also submitted a format to maintain the record of all Foreign Contributions, a copy of the same is attached herewith. Since the accounts team had not been aware of the above compliances and the regulatory issues, the returns for the Financial Year 2018-19 have been filed based on the information, data and documents maintained by the accounts team in a manner other than as suggested by us. However, it is advised that our suggestions be followed in order to render the documentation in line with the statutory requirements and also enable the accounts team to provide the documents to us in a manner to render us to file the returns without any scope of error and/or missing information.

Please feel free to contact us in case any clarification is required. Assuring you of the best of our services always.

For Khattak Kochhar & Co.



CA. Ajay Khattak
Partner