

APEX COUNCIL — SiEGA JOINT WORKING GROUP

An e-Secretariat Managed Non-Profit Social Welfare Initiative, Managed & Administered by
Savitri Chander Foundation, Powered by SRWA #ModiKiGuarantee Theme India

The Office of Sanjay Kaushik,

Passionate Journalist &
Social Worker

Founder Member & Head of Track-II
Institutional Affairs

Non-Government, Notification

India-SIEGA-NGN 104-9th of July 2026

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Policy Memorandum: Amendment of SiEGA Standard Operating Procedures (SOP)

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The Corporates

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CSR Sponsorships

To:
The Government of India
Shri Narendra Modi
Hon'ble Prime Minister of India &
Chairperson, NITI Aayog
New Delhi
(For information and necessary action)

THROUGH:

1. The Vice Chairperson, NITI Aayog
2. The Hon'ble Union Minister, Ministry of Corporate Affairs
3. The Secretary (West), Ministry of External Affairs

प्रधानमंत्री कार्यालय
सेवा तीर्थ
Prime Minister's Office
Seva Teerth
डाक अनुभाग
DAK SECTION
RECEIVED ON
Date 10/07/26

Ministry of Corporate Affairs
Dy. No. 1110 JR & IMCA
Date 10/7/2026

SUBJECT: AMENDMENT NOTIFICATION; SiEGA (Sustainable Indo-Euro Green Actions) "Skill to Scale Pathways"
Policy Framework & Standard Operating Procedure (SOP) Execution Architecture.

1. EXECUTIVE SUMMARY & CORE OBJECTIVE

This draft amendment establishes a legally compliant framework under the Ministry of Corporate Affairs (MCA), Prevention of Money Laundering Act (PMLA), and Foreign Contribution (Regulation) Act (FCRA). It permits the Savitri Chander Foundation (SCF)—a non-profit public trust—to serve as a pro-bono Knowledge, Monitoring, and Advisory Partner for government and corporate-sponsored SiEGA initiatives.

The SCF framework enforces a strict segregation of duties, ensuring that corporate sponsors retain direct executive oversight and administrative control of funds, thereby eliminating intermediate implementing agencies. Because SCF's strategic philanthropy advisory operates exclusively within its core charitable objects—maintaining a strict zero-fund-custody, zero-cash-handling, zero-foreign-funding, and zero-foreign-spending mechanism, while charging zero administrative or advisory fees to sponsors—the structural integrity and impact of the CSR expenditure are fully preserved.

Consequently, given SCF's strict non-custodial and advisory-only mandate, the requirement to register under Form CSR-1 is not triggered for rendering these pro-bono services. The Trust achieves institutional sustainability via the SiEGA Track II Pathways detailed on page 3.

2. THE TRIPLE-ZERO RISK FRAMEWORK (BOARD RISK MITIGATION)

To ensure structural risk mitigation and protect the Board of Directors, the operational framework enforces three distinct structural boundaries:

- **Zero Fund Custody:** The SCF shall never hold, route, or assume custody of project funds. All financial disbursements shall execute directly from the sponsor's escrow account to vetted third-party professionals or vendors.
- **Zero Operational and Advisory Fees:** No operational overheads, administrative charges, or consulting fees shall be levied upon the sponsor for monitoring or advisory services.
- **Zero Related-Party Transactions:** The SCF shall completely prohibit any transaction with related parties, as defined under Section 2(76) of the Companies Act, 2013, ensuring absolute avoidance of conflicts of interest and unauthorized beneficial interests.

Page 1

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India-SiEGA-NGN 104-9th of July 2026
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3. MULTI-TIERED GOVERNANCE STRUCTURE

SCF operates via a distinct, two-tiered digital infrastructure integrated with Citizen-centric Joint Working Groups (JWGs):

Tier 1: Trust Apex Council E-Secretariat (Strategic & Policy)

- **Mandate:** Aligned with the Trust's Quality Management System (QMS) across the SiEGA 10 Core Charitable Objects (Annexure-1).
- **Restriction:** Strict prohibition against non-Trust projects or commercial engagements.
- **Voting Rights:** Zero non-trustee voting rights. Policy controls remain strictly restricted to the Constitutional Trustees.

Level 1: Nominee of the Trustee (The Supreme Fiduciary)

- **Core Mission Preservation:** Ensures all council initiatives remain strictly aligned with the Trust's primary philanthropic and social objectives.
- **Top-Down Integrity Governance:** Holds ultimate veto power over policy directions to maintain strict regulatory and statutory compliance.

Level 2: The Strategic Policy Advisory Board (The Bureaucratic Anchor)

- **Bureaucratic Expertise Leverage:** Managed exclusively by retired senior bureaucrats from the Indian Administrative Service (IAS) and Central Civil Services (CCS) to navigate complex regulatory landscapes.
- **Group A (Honorary Chief Patrons):** Comprises one position for the Authorised Representative (AR) of NITI Aayog and upto 4 positions for former Ambassadors of India to European Countries & others.
- **Group B (Strategic Policy Advisors):** Anchored by senior representatives from central ministries (including MoRTH, NHAI, and MoHUA) alongside state government representatives from Haryana, Delhi, and Maharashtra.

Level 3: Institutional and Corporate Advisory Board (The Ecosystem Facilitator)

- **Group A (Institutional Advisory):** Comprises ex-officio representatives from apex public bodies (such as NHAI, GMDA, IICA, NIUA, and NFDC) and European Union (EU)-recognized, Ministry of Corporate Affairs (MCA)-registered Indian think tanks.
- **Group B (Corporate Advisory):** Reserved for up to 10 mid-level executives (maximum of one per corporate entity) acting in a strictly remote, ex-officio advisory capacity, with authority to engage up to 5 officials approved via board resolutions.
- **Group C (Media & Communications):** Manages public information dissemination, media relations, and ecosystem communications

Tier 2: Trust e-Directorate (Execution & Monitoring)

- **Mandate:** Evaluates and monitors Safexsure Designs & Projects (SDP) Detailed Project Reports (DPRs).
- **Resource Model:** Utilises empanelled independent third-party professionals and technical agencies.
- **Public Interface:** Offers free online engagement platforms to connect seamlessly with Citizen-centric Joint Working Groups (JWGs).
- **Level 1:** Government-vetted Safexsure Designs & Projects (SDP), other empanelled entities, and business groups.
- **Level 2:** Ex-officio government officers from central and state ministries.

4. COMPLIANCE & LEGAL SAFEGUARDS FRAMEWORK

- **Arms-Length Integrity & Recusal Protocols:** Mandatory disclosure of interests with immediate, automated recusal mechanisms for any advisory member possessing a perceived or actual conflict of interest.
- **Bureaucratic Ethics & Non-Remuneration:** Strict non-remuneration policy for all advisory panel members to maintain public-service integrity.
- **Indemnity Protection:** Complete legal indemnity protection explicitly provided to **non-trustee advisors only**, protecting them against personal liability for actions taken in good faith and legitimate advisory capacities.
- **RTI Transparency & Public Record Traceability:** Full voluntary compliance with Right to Information (RTI) principles. All digital records, DPR evaluations, and monitoring logs are fully traceable and publicly disclosable.



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India-SIEGA-NGN 104-9th of July 2026
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5. STATUTORY COMPLIANCE: MCA, PMLA, & FCRA

- **MCA Position:** Validates the legitimacy of non-MCA registered trusts providing pro-bono, non-commercial monitoring services for corporate CSR and government projects.
- **PMLA Framework:** Mitigates money laundering risks by eliminating cash transactions. All monetary movements occur via direct bank-to-vendor settlements based on verified milestones.
- **FCRA Blueprint:** Enforces an absolute **Zero Foreign Funding** and **Zero Foreign Spending** protocol, ensuring domestic self-reliance.

6. The SiEGA Skill to Scale Funding Allocation Pathways with Track II Indo-Euro Geopolitical Alignment**6.1. Executive Framework**

The framework establishes a formal capital and resource allocation mechanism for Government-funded, Corporate Social Responsibility (CSR) eligible, and Track II Indo-Euro geopolitical SiEGA projects. The strategic focus centers on scaling bilateral skill transfer, European Union (EU) Green technological integration, and harmonising industrial standards.

The framework is designed to optimise cost efficiencies in government and CSR projects, advance ecologically sustainable infrastructure, and operate independently of formal state-level diplomatic channels via Track II diplomacy.

6.2. Two-Step Allocation Mechanism• **Step 1: Evaluation & Principal Allocation**

- Detailed Project Reports (DPRs) formulated by Safexsure Designs & Projects (SDP) serve as the baseline for principal fund allocation. Capital is deployed by Government sponsors via official Ministry or Directorate Directives, and by Corporate sponsors via Board Resolutions passed under Section 135 of the Companies Act, 2013. All allocations are restricted to trust's charitable objects.

• **Step 2: Project Execution & Implementation**

- Direct execution of projects by sponsors is driven by SDP DPRs, operating in strict compliance with Non-Governmental Notification No. SRWA/N/OoSK/101-India (dated Friday, 24 April 2026), as processed and recognized by the Government of India (GoI).

6.3. Sustainable Implementation Pathways

Sustainability and operational scalability are maintained exclusively through non-cash, regulatory-compliant pathways categorized into three distinct streams:

6.3.1 SiEGA GOV Pathway (Government-funded)

- **Funding Mechanism:** Utilizes direct budgetary allocations, administrative sanctions, and sovereign notifications from government sponsors.
- **Purpose:** Funds validated projects of public-utility interest.

6.3.2 SiEGA VIK Pathway (CSR Eligible under Section 135)

- **Funding Mechanism:** Utilizes Corporate Social Responsibility (CSR) allocations in strict accordance with Section 135 and Schedule VII of the Companies Act, 2013.
- **Compliance Framework:** Governs the statutory transfer and deployment of unspent CSR funds into ongoing, government-vetted SiEGA projects, ensuring full compliance with the Companies (Corporate Social Responsibility Policy) Rules, 2014.
- **Operational Mandate:** Requires mandatory integration with SiEGA GOV Pathway projects.
- **Regulatory Clearance:** Entrusts the SiEGA Apex Council with the direct procurement and management of all government No-Objection Certificates (NOCs) and statutory clearances.

6.3.3 SiEGA Track II Pathway (Non-CSR Commercial & Resource Pools)

- **Funding Mechanism:** Engages business-to-business (B2B) non-cash exchanges, asset-pooling, and intellectual property (IP) transfers.
- **Commercial Rights:** Includes the commercial licensing of SiEGA project and event branding rights.
- **Compliance Framework:** Operates under strict adherence to the Prevention of Money Laundering Act (PMLA), 2002, the Foreign Contribution (Regulation) Act (FCRA), 2010 for cross-border flows, and applicable MCA mandates.
- **Scalability Engine:** Permits online donations and corporate retainers to serve as the primary drivers for operational sustainability and the scaling of Track II bilateral events.



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India-SIEGA-NGN 104-9th of July 2026
To, The Hon'ble Sh. Narendra Modi, PM of India, Seva Teerth

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7. The SiEGA Capacity Building Framework**Curriculum:** SiEGA (Sustainable India-Euro Green Actions) – Skill to Scale Pathways**7.1 Governance & Audience**

- **Exclusive Management Rights:** Office of Sanjay Kaushik at the SiEGA Apex Council.
- **Target Audience:** Government-nominated Ex-officio Officers and Board-nominated Institutional Leadership.

7.2 Objective

Spearheading Institutional Global Capacity Building and ESG leadership, this independent initiative deploys advanced E-learning, the SiEGA Track II “Incredible Viksit Bharat” Theme Conventions, and EU Talks models across India and Europe. Seamlessly integrated with the SNEEI framework (Samanvay – Namaste Europe, Echoes of India), the program anchors bilateral economic cooperation in a rich cultural exchange. By bypassing traditional state-level diplomatic channels, this agile, sub-national mechanism directly facilitates EU Green Technology Transfer to India. The strategic focus remains on unlocking high-value cost efficiencies for government and CSR-funded infrastructure projects, driving measurable, sustainable impact at scale.

7.3 Event Architecture

All SiEGA Conventions and EU Talks are institutional, pro-bono, and co-branded. They feature dedicated, pro-bono-based recognition and speaking slots, integrated with the SNEEI Showcase & Exchange.

7.3.1 SiEGA Phase 1: India Skilling & Scaling**Part-A: Basic Orientation**

- **Duration:** 1 Hour
- **Schedule:** Scheduled outside of standard working hours to protect productive time.
- **Focus:** Fundamental orientation on the SiEGA framework.

Part-B: Domain-Specific Co-Branded Orientation

- **Duration:** 5 Hours total (Split into 10 sessions of 30 minutes each).
- **Schedule:** Conducted during non-productive hours.
- **Focus:** Specialized sessions led by SiEGA-empanelled European Business Groups, showcasing innovative EU green technologies designed for project cost reduction.

Part-C: India Conventions & EU Talks

- **Locations:** Four-city tour covering Gurugram, Delhi, Panchkula, and Mumbai.

Part-D: SiEGA Track II Europe Delegation

- **Scale:** Up to 15 delegation members visiting Europe for strategic alignment ahead of Phase 2.
- **Core Delegation Composition:**
 - One (1) Ex-officio Government Officer from a Central Ministry.
 - One (1) Board-nominated CSR Head.
 - One (1) CEO from an Indian subsidiary of a participating European Business Group.
- **Purpose:** Establish foundational ties for the subsequent 100+ member study tour to Geneva and Brussels.

Part-E: Pilot Eco-Modelling

- **Scope:** Small-scale, Euro-look eco-modelling.
- **Location:** Sector 4, Gurugram.

7.3.2 SiEGA Phase 2: Europe Global Capacity Building Scale

- **Delegation:** More than 100 delegates selected by the SiEGA Council from four pilot Indian cities.
- **Duration:** Up to a 12-day, 5-city tour across Europe.
- **Activities & Itinerary:**
 - **Site Studies (6 days):** 2 days in Windhagen (Germany), 2 days in Paris (France), and 2 days in Zurich (Switzerland).
 - **Conventions & Dialogue (4 days):** SiEGA Track II Conventions and EU talks held in Geneva, Switzerland and Brussels, Belgium.
 - **Contingency (2 days):** Kept in reserve.

7.3.3 Phase 3: India Mega Scaling

- **Scope:** Transition to large-scale, Euro-look eco-modelling deployments.
- **Location:** Commencing from Sector 4, Gurugram, followed by nationwide expansion.



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India-SIEGA-NGN 104-9th of July 2026
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Submission Instructions

All queries, feedback, or formal objections regarding this notification must be submitted in writing within five (5) working days from the date of this publication. Please address all official correspondence to:

The Office of Sanjay Kaushik

Apex Council,

SiEGA Joint Working Group,

E-Secretariat,

Safexsure Foundation

Email: oo.sanjaykaushik.india@gmail.com

Legal Declaration of Tacit Consent

In the absence of any written objections received within the stipulated five (5) working day period, this notification shall be legally deemed as carrying the explicit and tacit approval of the Government.

This administrative process strictly aligns with the established Government Framework and the Public Traceability Record Framework. Failure to submit a timely objection will constitute a conclusive waiver of the right to contest the framework alignment.

For O/o Sanjay Kaushik



Authorized Signatory

Authorization Code-001

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Safexsure Foundation: Core Charitable Objects (Annexure-1)

The Foundation operates as a non-profit, public charitable entity. Its activities remain strictly aligned with the 10 Core Portfolios mapped to Schedule VII of the Companies Act, 2013.

The Core Ten (10) Portfolios

- **Portfolio 1: Urban Renewal & Ecological Infrastructure Development, Research & Special Education**
 - **Scope:** Focuses on European-inspired aesthetics, the development of ecological and sustainable green corridors, smart mobility integration, and sustainable urban planning. Additionally, it highlights the transfer of green technologies from abroad to India.
 - **Schedule VII Mapping:** Aligned with **Item (iv)** (ensuring environmental sustainability, ecological balance, and conservation of natural resources) & **Item (ii)** (promoting education, including special education and employment-enhancing vocational skills, especially among children, women, elderly, and the differently-abled, and livelihood enhancement projects).
- **Portfolio 2: Track-II Dialogues & Foreign Affairs**
 - **Scope:** Manages the Indo-European axis, international capacity building, bilateral global relations, and high-level international events.
 - **Schedule VII Mapping:** Aligned with **Item (v)** (protection of national heritage, art, and culture) and **Item (ix)** (funding technology incubators/academic collaborations as per Core Charitable objects).
- **Portfolio 3: Corporate & Public-Private Financial Affairs**
 - **Scope:** Streamlines corporate governance and Public-Private Partnership (PPP) models, and manages INR 100+ Billion fund mobilization via the "SiEGA Skill to Scale Pathways" framework.
 - **Schedule VII Mapping:** Serves as an operational enabler across all socio-economic and environmental programs mandated by Schedule VII.
- **Portfolio 4: AI & Frontier Tech Affairs**
 - **Scope:** Merges artificial intelligence and frontier technology portfolios to oversee smart-city automation, cybersecurity, and Digital Public Infrastructure (DPI).
 - **Schedule VII Mapping:** Aligned with **Item (ix)** (contributions to public-funded universities, IITs, and national laboratories conducting research in science, technology, and engineering).
- **Portfolio 5: Legal, Regulatory & Compliance Affairs**
 - **Scope:** Handles statutory alignment, Tier 1 and Tier 2 safety guarantee compliance, and international treaty frameworks.
 - **Schedule VII Mapping:** Serves as an operational enabler across all socio-economic and environmental programs mandated by Schedule VII.
- **Portfolio 6: Cinema, Cultural Heritage & Soft Power Affairs**
 - **Scope:** Drives the "Incredible India" narrative, cultural diplomacy, and global heritage preservation within smart urban ecosystems.
 - **Schedule VII Mapping:** Aligned with **Item (v)** (protection of national heritage, art, and culture, including restoration of buildings and sites of historical importance and works of art).
- **Portfolio 7: Socio-Economic Inclusivity & Human Capital Division**
 - **Scope:** Oversees the "Skill to Scale" mandate, linking global capacity building to vocational training and citizen-centric development.
 - **Schedule VII Mapping:** Aligned with **Item (ii)** (promoting education, including special education and employment-enhancing vocational skills among children, women, and the elderly).
- **Portfolio 8: Climate Resilience & Energy Transition Division**
 - **Scope:** Manages green hydrogen initiatives, carbon credits, net-zero compliance, and circular economy mandates to support the Indo-European axis.
 - **Schedule VII Mapping:** Aligned with **Item (iv)** (ensuring environmental sustainability, ecological balance, protection of flora and fauna, agroforestry, and conservation of soil, air, and water).
- **Portfolio 9: Wellness & Sports Excellence**
 - **Scope:** Spearheads athletic training, sports infrastructure development, and community well-being programs to foster grassroots talent and build national athletic capabilities.
 - **Schedule VII Mapping:** Aligned with **Item (vii)** (training to promote rural sports, nationally recognized sports, paralympic sports, and Olympic sports).
- **Omnibus Schedule VII Activities**
 - **Scope:** Covers special education, empowerment of women, children, and senior citizens, as well as any other activities, interventions, or programs permitted under Schedule VII of the Companies Act, 2013, as amended from time to time.
 - **Schedule VII Mapping:** Aligned dynamically with Items (i) to (xii) of the Act

