

Model Ethical Funding Policy

August 2019

Introduction

This document sets forth a model ethical funding policy for a non-governmental organisation ("NGO") that provides: (i) a process for the NGO to follow when determining whether to accept a donation of funds or other resources and (ii) criteria to assess potential or perceived ethical concerns associated with the acceptance of donations from prospective funders.

The model policy includes a set of general clauses, followed by possible considerations for the following categories of funders: (i) Government entities, (ii) Foundations, (iii) Corporations, (iv) Religious Institutions, (v) Individuals, (vi) Public Collections, (vii) Universities, (viii) Anonymous, and (ix) Crowd Funding sources. Each section is designed to be able to stand alone to allow the NGO to make different choices for the categories of funders it wishes to include in the policy — if similar choices are made across the selected categories, the NGO may wish to simplify the policy by combining sections and avoid duplication in each section.

The model policy is followed by a practical checklist to help operationalise the policy.

This model ethical funding policy has brackets ("[]") within the policy to enable an NGO to choose applicable optional language or insert its own language specific to its circumstances.

We also propose that any NGO's ethical funding policy, in full or summary form, be publicly available on the NGO's website to disclose the NGO's ethical perspective for the benefit of its stakeholders and the public.

Lastly, we propose that irrespective of the category of funder, each donation over EUR 50,000 should be reviewed by a committee (or equivalent) within the NGO to consider relevant (e.g., organisational, political, reputational) risks, in deciding whether to accept the donation. The NGO may choose to set a higher minimum for such review if a proposed donation meets a threshold test of acceptability. Please note that in order for the NGO to assess a funder's profile, the NGO may require access to certain databases that can efficiently provide it with adverse media information.¹

This policy was developed by Orrick, Herrington & Sutcliffe LLP and the Cyrus R. Vance Center for International Justice, both working on a pro bono basis, in collaboration with the Digital Freedom Fund, Civil Liberties Union for Europe, European Center for Constitutional and Human Rights, European Centre for Press and Media Freedom, and Ben Wagner. It is published under a [CC BY-SA 4.0](https://creativecommons.org/licenses/by-sa/4.0/)² license (attribution and share alike).

¹ Example: <https://accuity.com/what-we-do/sanctions-screening-pep-data/>.

² Full license: <https://creativecommons.org/licenses/by-sa/4.0/legalcode>. Human-readable summary: <https://creativecommons.org/licenses/by-sa/4.0/>).

Model Ethical Funding Policy

This Ethical Funding Policy (the “Policy”) is adopted to ensure that the NGO properly manages its priorities and projects with appropriate independence from its funders. This Policy also aims at providing transparency regarding the identity of the NGO’s sources of funding to avoid any suspicion of inappropriate influence or conflicts of interest concerning the NGO’s activities. *[Insert here any additional NGO-specific concerns that motivate the adoption of an ethical funding policy. Examples may include: risks that accepting funding could pose to the NGO’s activities or its direct partners and reputational risk and protecting the NGO’s brand, etc.]*

The NGO will apply the policies and considerations set forth in this Policy prospectively as of the date hereof to all types and amounts of funding from all sources, irrespective of whether the NGO has made decisions in the past to accept funding inconsistent with the policies and principles set forth in this Policy.

ARTICLE 1 Introduction

1.1 Definitions

1.1.1 “Board” shall mean the governing body of the NGO.

1.1.2 “Funder” shall mean any person or entity that provides funding, in any amount or form, to the NGO.

1.1.3 “Funding” shall mean support to the NGO, generally in the form of financial resources, but which also can take the form of services rendered by a funder (in-kind support,) or other resources, such as office premises, provided by a funder. Funding will consist of only voluntary, unilateral support to the NGO without return compensation or service rendered by the NGO.

1.1.4 “NGO” shall mean *[the non-governmental organisation enacting this Ethical Funding Policy]*, acting through an authorised officer, employee or other representative.

1.1.5 “Policy” shall mean this Ethical Funding Policy, adopted by the Board of the NGO on *[date of adoption]*, together with any amendments and additions to this policy.

1.1.6 “Reviewer³” shall mean the group responsible for performing the in-depth review of proposals for funding according to the criteria set forth in this Policy, including mandatory review of funding of EUR 50,000 or more, e.g., committee of the Board.

³ The NGO will determine the composition of the Reviewer that is feasible for its circumstances. The Reviewer likely should consist of one or more members of each of the Board and management, but also include at least one independent individual to provide a dispassionate perspective.

1.2 Principles and Mission Statement

1.2.1 [Include organisation specific principles and mission statements here].

ARTICLE 2 Funds Acceptance: General Conditions

2.1 The NGO shall advise the Reviewer of all proposed donations of EUR 50,000 or more, so that the Reviewer may determine whether the donation should be accepted.⁴ The Reviewer shall review the donation for compliance with, among other things, the terms and conditions of this Policy, the other policies, including other ethics guidelines of the NGO, and any other considerations that the NGO determines are appropriate given the nature of the funder and/or funding. The NGO shall present the Reviewer's determination to the Board which may reverse the Reviewer's determination and must approve the acceptance of any donation exceeding EUR 100,000.

2.2 Donations valued at less than EUR 50,000 need not undergo review by the Reviewer indicated in Section 2.1 above. However, acceptance of all donations must comply with the requirements of this Policy.

2.3 Subject to the requirements set forth in this Policy, the NGO shall have broad discretion in determining which donations to accept and which donations to reject; the NGO may choose to make public information relating to the rejection of any donation in accordance with the transparency provisions set forth in this Policy.

2.4 In addition to the specific considerations based on funder type in this Policy, the NGO will also take into account the following general considerations for all types of funders:

2.4.1 The NGO has ascertained that the funder generally and the proposed funding specifically comply with applicable law and any regulations pertinent to the funder.

2.4.2 The NGO has ascertained that the funding will not threaten or cause inappropriate influence over the NGO's programmes and activities. [Choose one of the following.]

(a) [The NGO, in according to the funder representation on the board of directors or other fiduciary or advisory body of the NGO, will confirm that such representation will

⁴ The NGO may opt to apply a higher minimum for referral to the Reviewer, such as EUR 100,000, when the proposed donation meets a threshold test of acceptability, including such factors as: 1) the NGO has received one or more previous donations from the proposed funder without any adverse consequences over a period of at least one year; 2) the proposed donation has no conditions or restrictions, including any specific publicity for the proposed funder; 3) the proposed funder is not the subject of any known controversy and has no known ideological, partisan, or commercial affiliation; 4) the proposed funder plans to provide the donation by transfer from a reputable bank or another form that involves verifying the source of funds and the donor's identity; 5) similar factors of credibility.

not provide the funder with undue influence over the decision making of the NGO and will require the representative of the funder to recuse him/herself from any decision related to the funding provided by the funder or the programme(s) funded by it.]

(b) [The NGO will not accord to the funder representation on the board of directors or other fiduciary body of the NGO]

(c) [The NGO will not accord to the funder representation on any fiduciary or advisory body of the NGO.];

2.4.3 The NGO has ascertained that the programmatic and reporting requirements of the funding will not impose an undue burden on the capacity of the NGO.

2.4.4 The NGO has ascertained that no conflicts of interest exist with the mission and programmes of the funder according to the NGO's conflict of interest policy⁵. In making a determination whether to accept funding, the NGO will consider the extent to which the funder is funding other organisations with missions and/or programmes that contradict or conflict with those of the NGO.

2.4.5 The NGO has ascertained that there is no significant risk that public association with the funder will compromise the integrity, or negatively impact the reputation, of the NGO, and that the NGO's members, partners, and other constituencies relevant to the mission and affected by the work of the NGO would not reasonably perceive acceptance of the funding to be inappropriate or unethical.⁶

2.4.6 The NGO has determined with reasonable confidence that the funder's source of funding to ensure compliance with local money laundering laws (for example, United Kingdom Proceeds of Crime Act of 2002).⁷

⁵ It is advised that NGOs adopt a conflict of interest policy and incorporate this provision into that policy.

⁶ In making this inquiry, NGOs should consider among other factors, the following questions: i) the nature of the business that the funder is involved in or associated with, ii) whether the funder has received unfavourable media attention for its actions, iii) whether the funder has been or is currently involved in litigation, and iv) the perception of the funder with key partners and/or the field in which the NGO operates.

⁷ Some characteristics of donations that may be considered high risk with respect to anti-money laundering regulations are: (i) requirement to repay the donation (in substance a loan), (ii) A donation in an unusual foreign currency, (iii) A donation which requires unusual transfer arrangements for the funds to be received by the NGO, (iv) A requirement to pass on the donation to a specific entity or use for a specific unusual purpose, (v) The funder's request of anonymity. (See **Fehler! Verweisquelle konnte nicht gefunden werden.** herein). (vi) Donations potentially creating a relationship in perpetuity, (vii) Donations sourced from countries with a problematic international status, e.g., countries on sanctions lists, such as Syria or Sudan, or regulatory

2.5 The NGO has confirmed that the type of costs or activities to be funded by funder are consistent with the NGO's policies and procedures (e.g., if government funding is only accepted for specific types of projects, the NGO shall confirm funding can and will be used accordingly).

2.6 The NGO has confirmed that the funder's reporting and disclosure requirements are consistent with the data and other privacy policies of the NGO and the privacy rights of its employees and beneficiaries

2.7 The NGO has determined the grant-making procedures and requirements of the funder comply with the transparency and freedom of information policies and practices of the NGO.

ARTICLE 3 Funds Acceptance: Funder-Specific Conditions

Sections that discuss the type of funders relevant to the NGO can be selected from the following categories. The NGO can select which criteria it seeks to apply to which type of funder and can indicate for which purposes funds received from the respective funder type will be used.

Government Funders

3.1 The NGO will accept funding from government entities, agencies, or other bodies owned or controlled by them, regardless of whether they are presented as independent, only when the following criteria are met:

3.1.1 The NGO has determined that the funder poses [*limited*][*no*] risk of interference with the NGO's current and future projects, based on political or other considerations.

3.1.2 The NGO has ascertained that the funder's institutions, policies, and practices are consistent with the NGO's mission, vision and principles;

3.1.3 The affiliation of the NGO with the funder based on accepting the funding does not limit the programmatic scope of the NGO's projects and strategic choices or does so to an extent the NGO has ascertained is acceptable in the circumstances; and

3.1.4 The NGO will accept funding from government funders to fund the following only: [*costs and/or activities*] [*NGO to specify for what type of costs/activities it will use this type of funding. Etc.*].

environment, and (viii) Donations from bodies with which the NGO has a significant pre-existing commercial relationship, or which could result in financial gain for the funder.

Foundation Funders

3.2 The NGO will accept funding from independent foundations, charities, and similar non-governmental, non-sectarian, and non-profit institutions only when the following criteria are met:

3.2.1 The NGO has ascertained with reasonable confidence that the source of the funds of the funder is legitimate and transparent;

3.2.2 The NGO has reviewed the history of the foundation, including publicly available information regarding previous grants and funding from the foundation, and based on this information, has determined that the NGO has no reason not to be affiliated with the funder and its previous grantees;

3.2.3 The NGO has ascertained that any specific philosophical or programmatic agenda or other interest of the funder does not conflict with the mission and programmes of the NGO;

3.2.4 The NGO will accept funding from foundation funders to fund the following *[costs and/or activities]* only *[NGO to specify for what type of costs/activities it will use this type of funding. Etc.]*.

Corporate Funders

3.3 The NGO will accept funding from corporations, including foundations or other entities that they or their owners, directors and/or officers own and/or control only when the following criteria are met:

3.3.1 The NGO has determined that the agreement between the funder and the NGO regarding the provision of the funding clearly distinguishes between philanthropic funding by the funder and advertisement and/or sponsorship of the funder;

The NGO has determined that the funder has not participated in deceptive advertising or promotional practices such as greenwashing⁸, rightswashing⁹, or whitewashing¹⁰;

3.3.2 The NGO has determined that the funder's public reputation, based on publicly available information, will not negatively affect the NGO by association. The NGO will not

⁸ Defined for this policy as disinformation disseminated by an organisation so as to present an environmentally responsible public image.

⁹ Defined for this policy as attempting to falsely present a human rights-friendly public image.

¹⁰ Defined for this policy as deliberately attempting to conceal unpleasant facts about an organisation.

accept funding from any funder whose business practices are unlawful or unethical or threaten harm to the reputation of the NGO;

3.3.3 The NGO will accept funding from corporate funders to fund the following *[costs and/or activities]* only *[NGO to specify for what type of costs/activities it will use this type of funding. Etc.]*.

Religious Funders

3.4 The NGO will accept funding from funders affiliated with organised religious or similar sectarian institutions only when the following criteria are met:

3.4.1 The NGO has determined that affiliation with the funder will not conflict with the mission or programmes of the NGO;

3.4.2 The NGO has determined that accepting funding from the funder will not unreasonably limit its future affiliation with other funders;

3.4.3 The NGO has determined that the funder's public reputation, based on publicly available information, will not negatively affect the NGO by association. The NGO will not accept funding from any funder whose ideology or practices are unlawful or unethical or threaten harm to the reputation of the NGO, such as discrimination based on race, ethnicity, gender or gender identification, sexual preference, nationality, age, disability, or other embodiment or expression of fundamental human rights; and

3.4.4 The NGO will accept funding from religion-affiliated funders to fund the following *[costs and/or activities]* only *[NGO to specify for what type of costs/activities it will use this type of funding. Etc.]*.

Individual Donations

3.5 The NGO will accept funding from individual funders only when the following criteria are met:

3.5.1 The NGO has ascertained that the risk of influence by the funder is acceptable to the NGO and will not interfere with the mission or programmes of the NGO. The NGO will confirm in writing with the funder what, if any role, the funder will have in advising, promoting, or otherwise being involved with the NGO and specifically any programme that the funding supports;

3.5.2 The NGO has determined any specific privacy concerns of the funder, including maintaining the anonymity of the funder, the funding amount, or the stated purpose of the funding are consistent with the NGO's transparency policies; and

3.5.3 The NGO has determined the lawfulness and legitimacy of the source of the funding and the individual's reputation.

3.5.4 The NGO will accept funding from individual funders to fund the following *[costs and/or activities]* only *[NGO to specify for what type of costs/activities it will use this type of funding. Etc.]*.

Public Donations

3.6 The NGO will accept funding collected from the general public only when the following criteria are met:

3.6.1 The NGO has ascertained that the practices used to collect the funds comply with ethical standards acceptable to the NGO. The NGO will examine multiple factors in determining whether the collection methods are acceptable, including:

(a) Collectors do not annoy or obstruct people when soliciting donations in public spaces;

(b) Collectors do not solicit from residences or by telephone or other electronic communication before or after working hours during the workweek, or at all on weekends and public holidays;

(c) Collectors do not use aggressive or misleading collection methods; and

(d) Collectors respect people's decisions not to donate.

3.6.2 The NGO has determined that the funder documents its collection methods, any expenses incurred, and any complaints received about its collection accurately, fully and verifiably and gives the NGO access to the documentation on reasonable request.

3.6.3 The NGO has determined that the funder solicits donations made only based on charitable motives, not for rewards or other benefits, and retaining only expenses of collection that are actually incurred, reasonable, and customary.

3.6.4 The NGO will accept funding from public donations to fund the following [*costs and/or activities*] only [*NGO to specify for what type of costs/activities it will use this type of funding. Etc.*].

Academic Institution Funding

3.7 The NGO will accept funding from academic institutions only when the following criteria are met:

(a) Any use that the institution proposes to make with data produced by the funded programmes of the NGO will comply with generally accepted ethical standards for academic research, as well as those to which the institution specifically is subject;

(b) The institution will use data produced by the funding only for academic purposes and not any commercial, partisan, or sectarian purposes; and

The NGO will accept funding from academic institutions to fund the following [*costs and/or activities*] only [*NGO to specify for what type of costs/activities it will use this type of funding. Etc.*].

Anonymous Funding

3.8 In the cases of (1) funding when the funder requests anonymity from the public, or (2) funding for which the NGO cannot ascertain the identity of the funder, the NGO will comply with the following additional considerations:

3.8.1 The NGO will accept funding of only less than EUR 800 when it cannot ascertain the identity of the funder and shall report such funding as having anonymous funders. In the event that the NGO receives any reasonable indication that such funding is inappropriate in any way, it shall reject, return, or provide to an alternative public service organisation, as the case may be;

3.8.2 The NGO will accept funding from funders requesting anonymity from the public only when the following requirements are met:

(a) The NGO has determined sufficiently the identity of the funder to confirm that no conflicts of interest, undue influence, or any other risks may arise from the funder's anonymity;

(b) The NGO has determined that the method in which the anonymous funder approached the NGO to express interest in providing funding does not raise any substantial concerns of non-compliance with applicable law or regulations, or this Policy.

If the anonymous funder approached the NGO through a representative, the NGO has determined that the representative is reputable within his or her field and meets any other standards of review that the NGO considers appropriate given the circumstances of the funding;

(c) The NGO has considered with the funder a less limited form of concealing the identity of the funder, such as disclosing his/her initials, nationality and/or profession; and

3.8.3 The NGO has determined that the reason which the funder has provided to remain anonymous is reasonable under the circumstances and does not raise a substantial risk of non-compliance with this Policy, any applicable laws, or any additional considerations that the NGO has determined are appropriate given the nature of the funder and/or the funding;

3.8.4 The NGO will accept funding from anonymous funders to fund the following *[costs and/or activities]* *[NGO to specify for what type of costs/activities it will use this type of funding. Etc.]*.

Crowdfunding

3.9 In the case of crowdfunding, the NGO will comply with the following additional considerations:

3.9.1 The NGO has determined that the reputation and methods of the crowdfunding platform are acceptable to the NGO and comply with the requirements and standards of this Policy;

(a) To the extent that the platform identifies donors, their identities conform to the requirements and standards of this Policy;

(b) The platform maintains compliance checks and standards to ensure compliance with any relevant anti-money laundering and similar legislation; and

3.9.2 The NGO shall obtain specific prior approval from the Board before entering into an arrangement to seek funding from crowdfunding.

3.9.3 The NGO will accept funding from crowdfunding to fund the following [costs and/or activities] only [NGO to specify for what type of costs/activities it will use this type of funding. Etc.].

ARTICLE 4 Funds Acceptance: Type of Funding Considerations

4.1 There are generally two types of funding: restricted and unrestricted funding. Restricted funding consists of grants or donations whose funders require that the funds be used in a specific way or for a specific purpose. Unrestricted funding consists of grants or donations whose funders authorise the NGO to use the funding for any purpose consistent with the NGO's mission, including administrative, programmatic, promotional, and other expenses. Unrestricted funds usually go toward the operating expenses of the NGO or longer-term projects.

4.2 The NGO may accept restricted funding only when the NGO has determined that it reasonably can comply with the conditions set by the funder, including that it has the administrative capacity to control, account for, and report on the use of the funding.

4.3 The NGO will examine the following additional factors in determining whether to accept restricted funding:

4.3.1 Whether the permitted use of funding complies with the NGO's policies and procedures;

4.3.2 Whether accepting restricted funding may tend to inhibit fulfilling the mission and goals of the NGO; and

4.3.3 Whether the level of control, if any, sought by the funder providing the restricted funding over future policies or projects of the NGO is conforms to the requirements and standards of this Policy.

4.4 The NGO performs the following types of activities, all of which may be funded through general, unrestricted funding:

4.4.1 *[Include types of activities appropriate for general funding, examples would include: specific projects of the NGO, any specific policy or lobbying efforts the NGO is supporting, etc.]*

4.5 The operating expenses of the NGO also may be funded through unrestricted funding. Operating expenses may include: fundraising, office rent and maintenance, accounting and auditing, supplies and materials, and other administrative costs.

ARTICLE 5 Implementation of Funding

5.1 The NGO shall document in written agreements with funders all terms and conditions of the funding that they provide. These agreements shall provide that no other terms and conditions

of the funding shall apply unless they too are documented in subsequent written agreements. The NGO shall instruct its employees, directors, officers, contractors, and other representatives that they may not agree to any terms and conditions with funders regarding any funding that they provide, except through written agreements signed by authorised representatives of the NGO.

5.2 In the event that the NGO receives reliable evidence that the information provided by a funder was incomplete or inaccurate at the time that it was provided or since has become so, the NGO promptly shall consider whether the agreement with the funder and the funding must be evaluated for possible amendment or rescission. For this purpose, the NGO shall communicate with the funder appropriately and, as advisable, confer with legal counsel and/or financial specialists, whether within the NGO or external.

5.3 In the event that the NGO determines that it received funding in violation of this Policy or that circumstances have changed so that the funding now violates this Policy, the NGO shall consider with respect to any amount of the funding remaining at its disposal (i) returning it to the funder, (ii) remitting it to an appropriate regulatory authority, or (iii) transferring it to an appropriate public service organisation with which it is not related. The NGO also shall consider appropriate communications with the funder and the public.

ARTICLE 6 Transparency and Communications

6.1 The relationship of the NGO and the funder shall be made public upon acceptance of the funding through any means to which the NGO and the funder agree, which may include, but are not limited to:

6.1.1 The NGO shall agree that the funder may state its support to the NGO in its own communications with the public;

6.1.2 The NGO shall agree that the funder may publicise the nature of any specific project or initiative: (i) if the funding enabled the NGO to implement, (ii) if the funding was specifically restricted for such project or initiative, (iii) if the funding was used entirely for a specific project or initiative, or (iv) under other conditions that the NGO and the funder agree comply with the principles set forth in this Policy;

6.1.3 The NGO shall disclose the name of the funder and the amount of the funding in its public communications, including its website, or in other materials of a similar nature, in a manner in which the funder has agreed; provided, however, that the NGO may choose for reasons of economy not to disclose the identity of funders providing less than EUR 10,000, but shall disclose the total number of such funders and the total amount of such funding.

6.2 The NGO shall not disclose any confidential information about the funder or the funding, including any conditions attached to it, to any unauthorised parties, unless the NGO and the funder have previously agreed that such disclosure is permissible.

6.3 The NGO shall disclose the total number of anonymous funders and the total amount of funds collected from them as a separate item of information.

6.4 The NGO shall publish accurate reports on its income and expenditures (including expenses incurred in soliciting contributions, gifts and grants), that meet the standards set forth in applicable law and regulations and provide clear, complete, and accurate information on its activities for stakeholders, beneficiaries, funders and the public.

Annex: NGO Checklist for Donations Exceeding EUR 50,000

Please note that this is not a comprehensive Ethical Funding Policy but intended as a brief checklist in conjunction with the attached Funding Policy. We recommend NGOs fully review the policy before making any determinations to identify whether to accept a donation of funds or other resources and review criteria to assess potential or perceived ethical concerns associated with the acceptance of funding from prospective funders.

For donations valued at less than EUR 50,000, the NGO shall exercise discretion whether to seek the Board's approval to accept such donations, based on the provisions and principles of this Policy. They do not need the additional scrutiny noted below but acceptance of all donations will nevertheless be subject to the conditions set forth in the Policy.

For donations exceeding EUR 50,000, the Reviewer shall review the funding proposals and determine whether the proposals conform with the provisions and principles of this Policy and specifically whether the following conditions are met:

- The NGO considered the procedural aspects of the funder's funding process and reviewed them against transparency and freedom of information standards.
- The NGO determined that by accepting funding there is no inappropriate influence over the programming of the NGO.
- The NGO undertook a conflict of interest review with potential projects of the funder to determine that there are no conflicts.
- The NGO determined there will be no harm to its reputation if it accepts funding/associate with the proposed funder. The NGO has also determined the source of funding to ensure compliance with applicable money laundering laws.
- The NGO confirmed that any costs/activities proposed by the funding are consistent with its own internal policies (i.e. if a governmental funder or a corporate funder, the NGO will follow the policies it has set forth for those respective funders).

The following is a checklist of specific conditions that the NGO should follow in regard to specific types of funders. Please note that this should still be consulted in conjunction with the more detailed Ethical Funding Policy that this is attached to.

Government Funders: The NGO will accept government funding only when the following criteria are met:

- The NGO determined there is limited/no risk of political inference.

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- The NGO determined the funder's policies and programmes align with the NGO's mission.
- The NGO determined no limitations will be placed on the NGO's other projects by accepting funding from the funder.
- The NGO determined there is no risk of public criticism from associating with the funder.

Foundation Funders: The NGO will accept funding from foundations only when the following criteria are met:

- The NGO is aware of the funder's source of the funds.
- The NGO determined that there are no conflicts in regard to the funder's mission and programs.
- The NGO reviewed the history of the foundation and found no issues/reasons that it should not accept funding on that basis.
- The NGO evaluated the public perception of the funder and its history of reporting on its activities and sees no issue with accepting funding from it.

Corporate Funders: The NGO will accept funding from corporate funders only when the following criteria are met:

- The NGO established clear protocols that distinguish between funding, advertisement, and sponsorship of the funder.
- The NGO determined the funder has not participated in deceptive or aggressive advertising or promotional practices.
- The NGO determined that association with the funder will not adversely affect the NGO.
- The NGO determined that the funder is not engaged in any practices that are unlawful or unethical or contradict the NGO's mission and principles.

Religious Institution Funders: The NGO will accept funding from religious institutions only when the following criteria are met:

- The NGO determined that affiliating with a religious institution does not pose a conflict with its mission or principles.

- The NGO determined that accepting funding from a religious institution does not limit or complicate affiliation with other funders.
- The NGO determined that the grant-making procedures of the funder comply with the transparency standards of the NGO and do not present other concerns.

Individual Donations: The NGO will accept individual donations only when the following criteria are met:

- The NGO determined that the risk of any individual influence is negligible and will not impact the NGO's mission or programmes.
- The NGO determined that there are no corruption or similar concerns related to the funder.
- The NGO determined that it has the capability to comply with any privacy concerns of the funder.

Public Donations: The NGO will accept public donations only when the following criteria are met:

- The NGO has determined the funder records its collections in a complete, accurate, and verifiable manner.
- The NGO determined the practices used to collect funds comply with the ethical standards set forth by the NGO, such as:
 - Collectors do not use other aggressive or deceptive methods when soliciting donations.
 - Collectors respect people's decisions not to donate.

Academic Institution Funding: The NGO will accept funding from academic institutions only when the following criteria are met:

- The NGO has determined that any use to which the academic institution will put data obtained from the funding of the NGO will comply with applicable ethical standards and not be commercial.

Anonymous Funding: The NGO will accept funding from donors declining to identify themselves sufficiently to the NGO only in amounts less than EUR 800 and when it perceives no reason to question the legitimacy of the donation. The NGO will accept funding from donors requiring anonymity from the public only when the following criteria are met:

- The NGO has determined the funder has reasonable reasons for requiring anonymity and this does not pose a conflict with the Policy as well as any applicable laws or considerations.

- The NGO has determined that there are no concerns with the manner how the anonymous funder approached the NGO, whether through themselves or through a representative.
- The NGO has received enough information from the funder to determine that it has complied with anti-money laundering, anti-terrorism, and any other laws, as well as the provisions of this Policy.

Crowdfunding: The NGO will consider the following factors when deciding to accept crowdfunding:

- The NGO has received prior approval from the Board.
- The NGO has determined that the crowdfunding platform has an acceptable reputation.
- The NGO has reviewed the compliance checks the crowdfunding platform undertakes and believes them to be appropriate and reasonable.