



Ethical Fundraising and Investment

Introduction

The purpose of this policy is to govern the fundraising and income generation activities of Anti-Tribalism Movement to ensure we do not compromise our vision and values when raising funds.

This policy applies to all donors and direct sources of income, but not to partner organisations, including those that are transferring funds to Anti-Tribalism Movement from a donor. All Anti-Tribalism Movement staff and trustees who initiate fundraising activities or receive funds are required to ensure adherence to the policy.

Ethical principles help us create an environment where ethical behaviour is accepted, encouraged and strengthened. The more we are dedicated to our central values and communicate them in a transparent and accountable way, the more everyone will understand what we, as well as donors and others, should and should not do. Furthermore, to achieve donors' trust it is important that we maintain a commitment to ethical principles and responsible fundraising practices.

The aims of this policy are:

- To ensure the principles of accountability and transparency are applied at all times.

- To ensure monies are not accepted from or invested in unknowingly or unwittingly an illegal or inappropriate source.
- To ensure a relationship is not opened or maintained with a funder or donor that would place Anti-Tribalism Movement outside of the law.
- To provide an escalation process where doubt exists as to whether a donation should be accepted or a dialogue with a funder opened or maintained.
- To protect Anti-Tribalism Movement's reputation by providing a clear decision-making process.

This policy is consistent with the UK's Charity Commission's and the Office for the Scottish Charity Regulator's guidance.

The principles

Our approach to responsible fundraising is driven by key principles:

- Our fundraising respects and protects our independence, impartiality and our mission.
- We fundraise with integrity.
- We work in partnership with those who support us.
- We value and respect our supporters.
- We are transparent in our fundraising and use of funds.
- We seek to maintain long-term partnerships with our supporters.

Our commitment to our donors

In our fundraising, income generation and relationships with our funders and donors, Anti-Tribalism Movement will at all times:

- Respect the rights of funders and donors, protect their privacy or anonymity, and provide timely and accurate information and reports. A donation will not be accepted if the identity of the donor is not known and cannot be established, and the donation is over £2,000. A donation will be accepted where the donor is known but does not want the fact disclosed, provided that the donor aligns with the rest of this policy.
- Ensure funding applications are, to the best of our knowledge, accurate and detail the activities and/or outputs and/or outcomes that will be supported by the donated funds.
- Ensure all funding applications made, or donations accepted, are in line with the strategic, operational and charitable objectives of Anti-Tribalism Movement.

- Treat funds that are expressly raised for particular activities as “restricted” and the associated expenditure will be accounted for to meet the requirements of the donor or funder.
- Ensure that projects and programmes are not double-funded.
- Never place undue pressure on a person to donate, fundraise in an intrusive fashion or knowingly target or exploit vulnerable adults or vulnerable circumstances of any donor at any point of time.
- Comply with all applicable local, state, provincial, national or international laws in our fundraising and income generation activities. This includes compliance with relevant data protection laws.

Code of Fundraising Practice

As a member of the Fundraising Regulator, we are committed to the highest standards in fundraising. We follow the Fundraising Regulator’s Code of Fundraising Practice. This code sets the standards for fundraising activity throughout the UK, and we use the Fundraising Regulator badge to publicly show that we are following these standards.

Transparency

We will publish this policy on our website and a list of one-off donations equal to or greater than £2,000 in our annual report and accounts unless the donor has specifically requested that the donation be kept private. We are committed to full compliance with all UK charitable and company law and other regulations relating to international accounting and auditing services.

Sources of funding

Financial: Financial donations are gifts and donations of cash (or stocks). We accept a variety of currencies which are held and managed strategically.

In-kind: Gifts in kind, also referred to as in-kind donations, is a kind of charitable giving in which, instead of giving money to buy needed goods and services, the goods and services themselves are given. We appreciate this type of donation particularly volunteering, consultancy services (including legal, governance), computer and IT software and hardware, office furniture and equipment, rent.

This policy has been designed to provide a risk scale for donors or funders, with category 1 being the highest and category 3 the lowest. It is expected that donors and relationships may move between the categories across time. It is intended to provide a clear decision-making process and ensure that records are kept as to why a particular path has been followed.

The personal beliefs of the staff, volunteers or board of Anti-Tribalism Movement should not affect the position of Anti-Tribalism Movement in this regard, though their concerns will be considered.

The sources of funding have been split into three risk-based categories.

1. Category 1 is where Anti-Tribalism Movement will refuse a financial or in-kind donation or will not open or maintain a dialogue on or about funding.
2. Category 2 is where Anti-Tribalism Movement may refuse a financial or in-kind donation or might not open or maintain a dialogue on or about funding. Each donation should be reviewed on a case-by-case basis. Similarly, each relationship in this category should be periodically reviewed.
3. Category 3 is where Anti-Tribalism Movement will accept a financial or in-kind donation or will open or maintain a dialogue on or about funding.

Category 1

Anti-Tribalism Movement will refuse a financial or in-kind donation or will not open or maintain a dialogue on or about funding if:

- The funds are associated with criminal sources or activities.
- The funds are from a governmental source or an associated foundation that is subject to international sanctions from an organisation such as the EU or the UN that prevents acceptance of such funds.
- The funds are from a proscribed organisation or individual as detailed in various national or international registers.
- The funds are from a designated individual or organisation.

Category 2

Anti-Tribalism Movement may refuse a financial or in-kind donation or might not open or maintain a dialogue on or about funding if –

- The funds are from a source that the leadership [p team and / or board of Anti-Tribalism Movement considers to be or has a reputation for operating in a way that could be in conflict with any of the vision, purpose, values or aims of Anti-Tribalism Movement. For examples
 - Those that exploit people in their supply chain (e.g. there's evidence of poor working conditions).

- Those that have disregarded social and gender justice (e.g. magazines containing degrading image).
- Those engaging in activities that damage the environment. (e.g. companies engaged in natural resources extraction / fossil fuel companies / companies where their work creates or sustains conflict).
- The funds are restricted to activities that are outside of the Memorandum and Articles of Association of Anti-Tribalism Movement.
- The funds are restricted to activities that are outside of the operational and strategic objectives of Anti-Tribalism Movement.
- The donor may have a vested interest in creating, sustaining or profiting from conflict. For example, defence equipment manufacturers / those companies that manufacture or distribute landmines, cluster bombs or nuclear weapons.
- A company that directly supports repressive regimes is involved.
 - The tobacco industry
 - Pornography
 - Modern slavery
- There are aspects of the donation or relationship that raise a concern for Anti-Tribalism Movement.

Category 3

Anti-Tribalism Movement will accept a financial or in-kind donation or will open or maintain a dialogue on or about funding with any donor or funder that is not in either category 1 or 2. Anti-Tribalism Movement will ensure that our capital and investments funds are invested with similar conditions.

Investments

Anti-Tribalism Movement holds funds for planned activities which a single donor or group of donors have agreed to support for a set period of time. The term of the funding contracts that we have in place at any one time range from 6 months to 5 years. Over the current Strategic Plan cycle 2024-2029.

We seek to produce the best possible financial return for funds held, within an acceptable level of risk, whilst ensuring that any investments are ethical. As nearly all funds raised are expected to be spent across the lifetime of the underlying funding contract, capital preservation and accessibility are of high importance. Where funding contracts permit investment of surplus funds they generally limit the scope of returns that can be earned, and the use to which the returns may be put. In some instances,

if returns are above a certain predetermined level, they need to be returned to the donor.

Anti-Tribalism Movement's assets are held in cash or near cash investments denominated in sterling or euro, its key operating currencies. Anti-Tribalism Movement does not invest directly in Bonds, Equities or Shares. As such, the scope of this policy refers only to funds held in banking institutions or institutionally managed investment funds.

We aim to ensure that investments are ethical. We take note of the Charity Commission's guidance on investment matters (CC14) and are working toward further consideration of both positive and negative screening approaches. In particular, we aim to ensure that investments do not contradict with the aims of our organisation.

We are aware that banking institutions lend to a range of actors, and therefore deposit funds may be seen as indirect investments. We will avoid this connection where possible and will question our service providers and advocate for them to meet our standards as outlined in this policy. Our service providers are reviewed periodically to ensure they provide an appropriate service, at a fair and reasonable cost. To date, we have not located a financial service provider that provides a high standard ethical option that would meet all our operational requirements.

The same criteria outlined in Categories 1 and 2 above will be used to guide which sectors Anti-Tribalism Movement will not directly or knowingly invest funds. As a client of banking institutions, we will preference investment of funds in companies signed up to the UN Global Compact and/or rated to a certain level by Sustainalytics.

Overall, Anti-Tribalism Movement's recognises that we must balance the aspirations of this policy with the moral imperative of being able to effectively do our work - which relies on receiving and holding funds. The risk assessment process for Category 2 institutions enables consideration of various factors so that an informed decision can be made in each case, balancing ethical concerns of the provider with organisational needs.