Donations Policy

March 2023
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1. TARGET GROUP

This Policy applies to donors donating to any FOUR PAWS entities, regardless of the types of donations or amounts involved, as well as all FOUR PAWS fundraisers and FOUR PAWS senior leadership team.

Entrance fees, merchandise purchased and lodging in FOUR PAWS sanctuaries are not considered donations to FOUR PAWS.

2. INTRODUCTION

It is through the generosity of its donors that FOUR PAWS can pursue its mission to fight for a world where humans treat animals with respect, empathy and understanding.

FOUR PAWS intends to ensure accountability and transparency in all areas of its work so that donors and supporters have full confidence and trust in the way in which FOUR PAWS operates.

FOUR PAWS is committed to treating all donors with respect, honesty and fairness. FOUR PAWS aims to follow relevant legal requirements and best practices in handling donations in every entity.

This Policy aims to provide guidance on the management of donations to FOUR PAWS. It provides information on what is expected from FOUR PAWS and its donors.

The content of this Policy may be adapted locally due to local regulations.
3. PRINCIPLES

FOUR PAWS fundraising activities follow the principles laid out in the Good Management Policy, Policy Against Fraud and Other Corrupt Practices and the FOUR PAWS Code of Conduct and in this Policy.

3.1. Share vision

Donations received from FOUR PAWS’ donors empower the vision of FOUR PAWS of a world where people treat animals with respect, empathy, and understanding.

Through their donations, donors support FOUR PAWS principles laid out in IDS-FOUR PAWS Code of Conduct, notably regarding harm towards humans and animals.

3.2. Autonomy

FOUR PAWS shall remain free from undue influence regarding its management or processes. FOUR PAWS must always remain objective and impartial to accomplish its mission. While donors’ expectations are important to FOUR PAWS, its mission to Reveal, Rescue and Protect animals comes above all.

Accepting a donation does not mean endorsement of the donors, their activities or products.

3.3. Honour

FOUR PAWS does not use any unethical or unlawful techniques to solicit funds such as knowingly targeting children or vulnerable people.

FOUR PAWS shall not engage in any activities that involve discriminatory practices against any individual or group as described in the Workplace Policy, POL-Good Management Policy and Policy Against Fraud and other corrupt practices.

There shall not be any incidence of false, misleading, and or ambiguous information in any of FOUR PAWS fundraising communications.

FOUR PAWS pays particular attention to the acquisition and management of personal and financial data from donors. Data privacy shall be in line with local regulations as reflected in the Data Privacy Statement.

3.4. Transparency

FOUR PAWS intends to be transparent regarding its activities, organisational objectives, and funding.

FOUR PAWS shall communicate regularly to its donors about the projects it is managing and or donations are used.

When fundraising activities for specific activities, FOUR PAWS shall communicate the goals and the needs clearly.
4. MANAGEMENT

4.1. Donations

4.1.1. Sources

In order to raise funds and awareness of its work, FOUR PAWS conducts the following fundraising activities:

- Face-to-face
- Over the telephone
- Through emails
- Through letters (known as direct mail)
- Television and radio spots
- Digital advertising
- Press advertising
- Legacies, events and community fundraising
- Other fundraising activities

FOUR PAWS generally accepts donations from:

- Private individuals
- International institutions
- Trust and foundations
- Charitable organisations
- Corporations

While FOUR PAWS engages with a number of corporations, FOUR PAWS differentiates corporations supporting its work through financial and non-financial donations (donors) from corporations partnering with FOUR PAWS on a project or campaign (partners). Donors’ and partners’ statuses are not mutually exclusive.

Our corporate partnerships are subject to a specific due diligence and framework.

4.1.2. Types

FOUR PAWS receives various types of donations. The types described below are not mutually exclusive.

4.1.2.1. Monetary donations

Throughout its fundraising activities, FOUR PAWS collects either one-off donations or recurring monetary donations.
4.1.2.2. Legacies

FOUR PAWS regularly accepts donations received through a will of a supporter. Such contributions can take various form such as real estate or bonds. Legacies are managed through a rigorous process and utilized to maximise their value to accomplish the FOUR PAWS mission.

FOUR PAWS may accept [after due diligence process] legacies from anywhere in the world.

4.1.2.3. Corporate gifts

When benefits and recognition are offered by FOUR PAWS to a corporate donor, FOUR PAWS and the donor should enter into a formal Letter of Agreement [following local regulations].

4.1.2.4. Gifts in kind

Gifts in kind are goods or services donated to further the goals of the organisation. Examples of such services include pro bono consulting services and advertising, or equipment given to sanctuaries or offices.

FOUR PAWS may only provide proof of donations for gifts in kind where FOUR PAWS is able to substantiate the value of the gift and follows the local regulations.

4.1.3. Categories

4.1.3.1. Unrestricted donations

When not otherwise agreed with donors via an agreement [see section 4.1.3.2 Restricted donations], donations to FOUR PAWS are considered unrestricted donations.

Income received through unrestricted donations is used to maximise the impact of FOUR PAWS worldwide.

4.1.3.2. Restricted donations

Donors can request temporary or permanent restrictions on the use of their donation and reporting obligations, notably financial reporting. FOUR PAWS defines with donors the potential conditions and reporting obligations that such donations might have.

If the donation is accepted with the conditions and reporting obligations agreed upon with the donor, the donation is thus a restricted donation. Such conditions can be to fund a specific project, to be used in a specific geographical scope, in a specific time frame, anonymity, etc.

All restricted donations shall be subject to a written agreement between the donor and FOUR PAWS.

In the event that the use of a restricted donation might not be possible – e.g., Pandemic, conflict, etc - FOUR PAWS shall obtain the consent of the donor to use the remaining income for another purpose.
4.1.3.3. Donations accepted on behalf of FOUR PAWS

In the event that a colleague receives a donation addressed to them personally instead of to FOUR PAWS, the donation must be transferred to FOUR PAWS as an unrestricted donation.

4.1.4. Acceptance of donations

4.1.4.1. Evaluation

FOUR PAWS aims to apply stringent processes to evaluate donations. When deciding on whether to accept a donation FOUR PAWS intends to:

- Comply with any legal or regulatory requirement in application to the FOUR PAWS entity receiving the donations;
- Ensure that decisions around donations accord with the vision, mission, values, and standards of FOUR PAWS;
- Ensure that the projects and activities still require funds for their completion, when reviewing potential restricted donations;
- Ensure that donors have the correct understanding of the potential use of the funds when restricted donations.

4.1.4.2. Due diligence

When evaluating a donation FOUR PAWS shall evaluate if:

- The donation is suspected or known to be derived from the proceeds of illegal activity:
  - Donations in cash shall be paid particular attention and be handled with due process internally.
- The values of the donor, in particular for corporate donors, are not aligned with the values of FOUR PAWS:
  - It is advisable that a potential donating corporation has made a public commitment to ethical standards.
  - FOUR PAWS does not accept donations from corporations that create products that cause physical harm to human beings, animals, or the environment.
  - FOUR PAWS does not accept donations from corporations operating in any of the following sectors:
    - Genetic-manipulated feedstock;
    - Pornographic industry;
    - Pharmaceutical and cosmetic industry involving animal testing;
    - Tobacco industry;
    - Gambling industry;
    - Military industry.
- Accepting the donation would:
  - Damage the reputation of FOUR PAWS;
  - Contribute to a decline in other support;
- Damage the FOUR PAWS’ charitable status, tax-exempt status, and or membership of other organisations;
- Damage the independence of FOUR PAWS.

FOUR PAWS reserves the right to refuse a restricted donations where the association conditions might be:
- Contrary to the objectives of FOUR PAWS or divert FOUR PAWS from its priorities;
- Unreasonable or unsuitable to the reputation of FOUR PAWS;
- Obliging FOUR PAWS to first spend its own funds or resources in order to access the donated funds;
- Requiring complex processes to process the donation which would incur a cost that exceeds the value of the donation to FOUR PAWS.

4.1.4.3. Re-payment of refused donations

In case a donation, which FOUR PAWS must refuse, has already been paid to FOUR PAWS bank account, the re-payment will be executed immediately after the detection of the receipt.

4.2. Donors’ rights

FOUR PAWS donors have the following rights:

4.2.1. Information

1. To be informed of the FOUR PAWS mission and latest projects as well as the intended use of the funds it receives;

2. To be informed of the identity of those serving on the Board, and to expect the Board to exercise prudent judgement in its responsibilities;

3. To have access to the organisation’s most recent International Annual Report;

4. To be assured that their donations are used in agreement with FOUR PAWS internal standards and principles;

5. To know when FOUR PAWS projects are implemented by a third-party organisation.

4.2.2. Data

6. To be assured that information about their donations is handled with respect and confidentiality at a minimum to the extent provided by law or beyond as presented in the publicly available Data Privacy Statements.
7. To be assured that all online transactions and contributions occur through a safe and secure system that protects the donor’s personal information;

8. To be assured that any information obtained shall not be disclosed without following the legal requirements and due process presented in the publicly available Data Privacy Statements;

9. To have the opportunity for their data to be deleted from mailing lists or any other listing done by FOUR PAWS following the processes described in the publicly available Data Privacy Statements.

4.2.3. Disclosure

10. To be informed whether those seeking donations are volunteers, employees of the organisation, or hired third-party agency;

4.2.4. Feedback

11. To have the possibility to notify FOUR PAWS of their wishes and comments on FOUR PAWS’ work;

12. To receive answers within a reasonable timeframe;

13. To feel free to bring forth complaints and be treated respectfully.

4.2.5. Refund

14. To request full or partial refund of their donation according to the local regulations.

4.2.6. Proof of donation

15. To receive a receipt of their donation in accordance with the local regulation for donations deductibility.

4.3. Fundraisers

FOUR PAWS fundraising activities around the world are managed by different types of people, all committed to adhering to FOUR PAWS fundraising guidelines.

4.3.1. Categories

4.3.1.1. Employees

FOUR PAWS fundraising work is orchestrated by specialised employees, trained and experienced in fundraising activities.
The fundraising activities of FOUR PAWS are the responsibility of the fundraising team, distributed throughout several FOUR PAWS offices.

### 4.3.1.2. Supporters

As part of their contributions to the FOUR PAWS mission, some supporters might engage in fundraising activities on behalf of FOUR PAWS.

FOUR PAWS shall ensure that the relationship, communication, and management of supporters are done in a respectful, grateful, and efficient way.

### 4.3.1.3. Third parties

Parts of FOUR PAWS fundraising activities may be managed by third parties such as specialised agencies.

FOUR PAWS seeks to ensure that any donations sought indirectly, such as through third-party agents, are solicited and received in full conformity with the organisation’s own standards and practices, notably through contractual agreements.

### 4.3.2. Commitments

FOUR PAWS and its fundraisers commit to the highest standards of good practice and to ensuring that all their fundraising activities are respectful, honest, open and legal.

Fundraisers notably commit to:

1. Conduct themselves at all times with integrity, honesty and trustworthiness. They must act at all times openly and in such a manner that donors are not misled;
2. Not knowingly or recklessly disseminate false or misleading information regarding FOUR PAWS or any other organisation;
3. Not exploit any relationship with a donor, prospect, volunteer or employee for personal benefit or misuse their authority or office for personal gain;
4. Act according to the highest standards and vision of FOUR PAWS as well as the local regulation applicable to their activities;
5. Respect the dignity of their profession and ensure that their actions enhance the reputation of themselves and of FOUR PAWS that they represent;
6. Use the name, image and material of FOUR PAWS in truth of their intended use;
7. Be open about the nature of their professional relationship with FOUR PAWS.
5. IMPLEMENTATION

5.1. Responsibility

5.1.1. Chief Marketing Officer

It is the responsibility of the Chief Marketing Officer to:

1. Ensure that FOUR PAWS independence and reputation is not jeopardised,
2. Promote the existence of the Policy and other relevant principles to the public, donors and supporters;
3. Ensure that a feedback mechanism is in place;
4. Ensure that FOUR PAWS’ commitment to best practice in fundraising is communicated in all relevant public statements (annual reports, website, policy statements, governance documents, etc);
5. Ensure that all relevant suppliers and contractors are informed about and contracted to adhere to the principles in this Policy in their fundraising work for FOUR PAWS;
6. Assess the fundraising plans of FOUR PAWS on a regular basis according to the guiding principles of this Policy;
7. Ensuring that senior leadership takes responsibility for implementing and adhering to the policy.

5.1.2. Fundraising team

It is the responsibility of the Fundraising team to:

1. Develop and implement fundraising plans for FOUR PAWS in cooperation with the Finance department and the Board;

5.1.3. Directors Country

It is the responsibility of the Directors Country to:

1. Report to the National Boards on fundraising performance;
2. Ensure that, where paid, all fundraisers and third party agents are given appropriate contracts, to include a clause stipulating their compliance with this Policy and with any legal requirements that may apply;
3. Ensure that, where paid, fundraisers are remunerated by such methods that will avoid the incidence of pressure on the potential donor to donate (e.g. no commission-based remuneration).
5.2. Accountability

5.2.1. FOUR PAWS Board

The ultimate accountability for meeting the principles of this Policy lies with the Board.

5.2.2. National Boards

National Boards are accountable for implementation of the fundraising plans in FOUR PAWS country offices.

6. CONSEQUENCES OF BREACHING THE DONATIONS POLICY

Breach of this Donations Policy may constitute an infringement of applicable laws resulting in civil or criminal liability and may have an adverse effect on FOUR PAWS and other colleagues.

In case of non-compliance with the provisions of this Donations Policy, FOUR PAWS will take necessary response measures and might need to take disciplinary actions, up to and including termination of contractual relationship with FOUR PAWS or, if necessary, report the incident to the relevant authorities.

Any colleague found to be involved in fraudulent and/or corrupt activities, or who has been negligent in the exercise of their supervisory duties will be subject to disciplinary action, including potential dismissal (termination of their employment). If warranted, FOUR PAWS will also initiate civil and/or criminal proceedings against those individuals involved.

7. REPORTING OF MISCONDUCT

Colleagues must immediately report any breach of this Donations Policy, whether deliberate or accidental, to a line manager or other relevant function within the organisation appointed to receive such reports. Should a line manager or other relevant function within the organisation appointed to receive such reports be involved in the suspected breach of this Donations Policy, incidents must be reported to their superior and Human Resources. Colleagues at FOUR PAWS must not prevent any other colleague or affected individual from reporting a suspected breach of this policy.

FOUR PAWS will not retaliate against colleagues who report a presumed breach of this Donations Policy in good faith no matter the outcome. Should colleagues choose to knowingly make false allegations, FOUR PAWS may take disciplinary action. FOUR PAWS provides colleagues with instructions on how to confidentially report a suspected breach of this Policy.