



ETHICAL FUNDING POLICY OF THE CIVIL LIBERTIES UNION FOR EUROPE

This Ethical Funding Policy (the “Policy”) is adopted to ensure that the Civil Liberties Union for Europe (Liberties) properly manages its priorities and projects with appropriate independence from its funders. This Policy also aims at providing transparency regarding the identity of Liberties’ sources of funding to avoid any suspicion of inappropriate influence or conflicts of interest concerning the activities of Liberties. Furthermore, the Policy aims to highlight the importance of the diversification of funding, as relying on many sources of income helps Liberties to maintain its independence.

Liberties’ vision is that there should be full implementation of human rights inside the EU. Authority over the territory of the EU is divided between the EU and national governments. Liberties’ main focus is on the EU, to ensure that the EU uses its powers to respect (refrain from actively violating rights), protect (prevent third parties, such as national governments and companies, from violating rights), and promote (take measures to create an environment where rights are more likely to be realised) human rights. The main focus of national members is to ensure that national governments respect, protect and promote human rights at national level.

Liberties needs to be in a position to work with partners to persuade power holders directly, influence power holders through others and build support among the public. The nature of Liberties’ activities demands Liberties to be influential, and its identity must reflect its values of a credible, effective and engaging organisation. Taking an ethical fundraising

approach is a foundation for these values to materialize. Liberties must aim to minimize dependency on any single source of funding and maximize both the level of funding and the diversity of funding sources.

Liberties 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 Liberties has made decisions in the past to seek or 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 Liberties.
- 1.1.2. “Funder” shall mean any person or entity that provides funding, in any amount or form, to Liberties.
- 1.1.3. “Funding” shall mean support to Liberties, 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 Liberties without return compensation or service rendered by the NGO.
- 1.1.4. “NGO” shall mean the Civil Liberties Union for Europe (“Liberties” in short), acting through an authorised officer, employee or other representative.
- 1.1.5. “Policy” shall mean this Ethical Funding Policy, approved by the Board of Liberties, and adopted by the Full Right Members of Liberties with a vote on April 2nd, 2021 - together with any amendments and additions to this policy.

- 1.1.6. “Reviewer” shall mean the committee of the Board 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.

1.2. Principles and Mission Statement

- 1.2.1. Liberties’ vision is for the *full implementation of human rights in the European Union.*
- 1.2.2. Liberties’ mission is the *Protection and promotion of human rights in the EU through carefully planned advocacy and communication initiatives, as well as empowerment and promotion of our members and partners through capacity building and coordinated initiatives.*

Article 2.

Funds Acceptance: General Conditions

- 2.1. Liberties’ Executive Office 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. The Reviewer shall review the donation for compliance with, among other things, the terms and conditions of this Policy, and any other considerations that the NGO determines are appropriate given

the nature of the funder and/or funding. The Reviewer's determination shall be presented to the Board, which may reverse the Reviewer's determination. Acceptance of any donation exceeding EUR 100,000 requires approval from the Board.

- 2.2. The Executive Office must seek the Reviewer's opinion before submitting a proposal, or accepting the funds, in the earliest possible stage of the fundraising process.
- 2.3. In case of applying to a donor registered in a country where Liberties has a Full Right Member, the Executive Office must notify the Member Organization about the possible application.
- 2.4. Liberties will apply a higher minimum amount 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.

- 2.5. 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.
- 2.6. Subject to the requirements set forth in this Policy, Liberties shall have broad discretion in determining which donations to accept and which donations to reject; Liberties may choose to make public information relating to the rejection of any donation in accordance with the transparency provisions set forth in this Policy.
- 2.7. In addition to the specific considerations based on funder type in this Policy, Liberties will also take into account the following general considerations for all types of funders:
 - 2.7.1. Liberties has ascertained that the funder generally, and the proposed funding specifically, comply with applicable laws and any regulations pertinent to the funder.
 - 2.7.2. Liberties has ascertained that the funding will not threaten or cause inappropriate influence over the NGO's programmes and activities.

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

2.7.4. Liberties has ascertained that no conflicts of interest exist with the mission and programmes of the funder according to the Liberties' conflict of interest policy. In making a determination whether to accept funding, Liberties 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.

2.7.5. Liberties 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 Liberties' members, partners, and other constituencies relevant to the mission and affected by the work of Liberties would not reasonably perceive acceptance of the funding to be inappropriate or unethical.¹

2.7.6. Liberties has determined with reasonable confidence the funder's source of funding in order to ensure compliance with local money laundering laws.²

2.8. Liberties 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 a particular type of funding is only accepted for specific types of projects, the NGO shall

1 In making this inquiry, Liberties may 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 SLAPP litigation or in any other major litigation process, which could negatively impact its grantees; and iv) the perception of the funder with key partners and/or the field in which the NGO operates.

2 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; (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 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.

confirm funding can and will be used accordingly).

- 2.9. Liberties has confirmed that the funder's reporting and disclosure requirements are consistent with the data and other privacy policies of Liberties and the privacy rights of its employees and beneficiaries.
- 2.10. Liberties has determined the grant-making procedures and requirements of the funder comply with the transparency and freedom of information policies and practices of Liberties.

Article 3.

Funds Acceptance: Funder-Specific Conditions

In order to ensure there are adequate funds to support the organization and all of Liberties' activities, Liberties will actively seek funds, and accept funds with consideration of the following funder-specific conditions. Liberties may allocate the funds to either or both program and operational costs in line with the needs of the organization to be able to meet its strategic goals and in line with any restrictions and with adherence to the principles of this Policy.

Government Funders and Funders Related to Political Parties

- 3.1. Liberties will **not apply for and will not accept** funding from government entities, agencies, or other bodies owned or controlled by them, regardless of whether they are presented as independent. This prudent decision is based on the actual or perceived possibility that government funding conditions may promote policy preferences and ascertain undue influence on the programmatic goals and mission of Liberties. Liberties will **not apply for and will not accept** funding from any sources, including foundations or any donor entities, which are controlled by or financially connected to political parties.

Intergovernmental Funders

- 3.2. Liberties differentiates in nature between government entities and intergovernmental entities as funders, with particular emphasis placed on the fact that members/representatives of intergovernmental agencies have vowed to represent the general interest of the territory as a whole, rather than their home state.
- 3.2.1. Funds from intergovernmental funders whose institutions, policies, and practices are consistent with Liberties' mission, vision and principles may be considered. In the context of Liberties' activities, notable intergovernmental funders include, but are not limited to, the Council of Europe, the European Union, the Organization for Economic

Cooperation and Development, the Organization for Security and Co-operation in Europe, and the United Nations.

- (a) In the case of the European Union, Liberties emphasizes a vital further differentiation between EU funding sources managed by EU countries and those funds managed directly by the European Commission or other EU bodies. Liberties will only apply for and accept funding from those funds managed directly by the Commission or other EU bodies and will not apply for or accept funds managed by EU countries - in line with the previously mentioned policy on not accepting government funds.

3.2.2. Liberties will actively apply for and accept funding from intergovernmental 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:

- (a) Liberties has determined that the funder poses no risk of interference with the NGO's current and future projects, based on political or other considerations.
- (b) Liberties has ascertained that the funder's institutions, policies, and practices are consistent with

the NGO's mission, vision and principles;

- (c) The affiliation of Liberties 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.

Foundation Funders

3.3. Liberties will apply for and accept funding from independent foundations, charities, and similar non-governmental, non-sectarian, and non-profit institutions only when the following criteria are met:

- 3.3.1. Liberties has ascertained with reasonable confidence that the source of the funds of the funder is legitimate and transparent;
- 3.3.2. Liberties 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;
- 3.3.3. Liberties 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.

Corporate Funders

3.4. Liberties will apply for and 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:

3.4.1. Liberties 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;

3.4.2. Liberties has determined that the funder has not participated in deceptive advertising or promotional practices such as greenwashing³, rightswashing⁴, or whitewashing⁵;

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

association. Liberties will not accept funding from any funder whose business practices are unlawful or unethical or threaten harm to the reputation of the NGO.

Academic Institution Funding

3.5. Liberties will apply for and accept funding from academic institutions only when the following criteria are met:

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

3.5.2. The institution will use data produced by the funding only for academic purposes and not any commercial, partisan, or sectarian purposes.

Individual Donations, Public Donations, and Crowdfunding

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

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

5 Defined for this Policy as deliberately attempting to conceal unpleasant facts about an organisation.

3.6. Liberties will seek to receive and accept funding from individual funders, public donations and through crowdfunding.

3.6.1. Liberties will seek to receive and accept funding from individual Donations under the following criteria:

- (a) Liberties 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. Liberties 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;
- (b) Liberties 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
- (c) Liberties has determined the lawfulness and legitimacy of the source of the funding and the individual's reputation.

3.6.2. Liberties will seek to receive and accept funding collected from the

general public only when the following criteria are met:

- (a) Liberties has ascertained that the practices used to collect the funds comply with ethical standards acceptable of Liberties. Liberties will examine multiple factors in determining whether the collection methods are acceptable, including:
 - (i) Collectors do not annoy or obstruct people when soliciting donations in public spaces;
 - (ii) 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;
 - (iii) Collectors do not use aggressive or misleading collection methods; and
 - (iv) Collectors respect people's decisions not to donate.
- (b) Liberties has determined that the funder documents its collection methods, any expenses incurred, and any complaints received about is collection accurately, fully and verifiably and gives the NGO access to the documentation upon reasonable request.

- (c) Liberties 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.
- 3.6.3. In the case of crowdfunding, Liberties will comply with the following additional considerations:
- (a) Liberties 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;
 - (b) To the extent that the platform identifies donors, their identities conform to the requirements and standards of this Policy;
 - (c) The platform maintains compliance checks and standards to ensure compliance with any relevant anti-money laundering and similar legislation; and
 - (d) Liberties shall obtain specific prior approval from the Board before entering into an arrangement to seek funding from crowdfunding.
- 3.7. In the cases of (1) funding when the funder requests anonymity from the public, or (2) funding for which Liberties cannot ascertain the identity of the funder, the NGO will comply with the following additional considerations:
- 3.7.1. Liberties 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;
 - 3.7.2. Liberties will accept funding from funders requesting anonymity from the public only when the following requirements are met:
 - (a) Liberties 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) Liberties 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 laws or regulations, or this Policy.

Anonymous Funding

If the anonymous funder approached Liberties 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) Liberties 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

3.7.3. Liberties 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.

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.

4.1.1. Programmatic expenses of Liberties may be funded through unrestricted and restricted funding.

4.1.2. The operating expenses of Liberties may be funded through unrestricted and restricted funding (the latter often in the form of overhead costs within restricted funds expressed in percentage of the total budget). Operating expenses may include: fundraising, office rent and maintenance, accounting and auditing, supplies and materials, and other administrative costs.

- 4.2. Liberties may seek and 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. Liberties will examine the following additional factors in determining whether to seek and accept restricted funding:
 - 4.3.1. Whether the permitted use of funding complies with Liberties' policies and procedures;
 - 4.3.2. Whether accepting restricted funding may tend to inhibit fulfilling the mission and goals of Liberties; 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 Liberties conforms to the requirements and standards of this Policy.

Article 5.

Implementation of Funding

- 5.1. Liberties 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. Liberties 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 Liberties 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, Liberties 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 Liberties determines that it received funding in violation of this Policy or that circumstances have changed so that the funding now violates this Policy, Liberties 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 Liberties 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. Liberties shall agree that the funder may state its support to the NGO in its own communications with the public;

6.1.2. Liberties shall agree that the funder may publicise the nature of any specific project or initiative: (i) if the funding enabled Liberties to implement it, (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 Liberties and the funder agree comply with the principles set forth in this Policy;

6.1.3. Liberties 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 Liberties 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. Liberties 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. Liberties 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. Liberties 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.

This Policy is based on the Model Ethical Policy developed jointly in 2019 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, Liberties, the European Center for Constitutional and Human Rights, the European Centre for Press and Media Freedom, and Ben Wagner. The model policy was published under a [CC BY-SA 4.0](https://creativecommons.org/licenses/by-sa/4.0/)⁶ license (attribution and share alike).

The Liberties Ethical Funding Policy was approved by the Full Right Members of Liberties on April 2nd, 2021.

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

Annex: NGO Checklist for Donations Exceeding EUR 50,000

For donations valued at less than EUR 50,000, Liberties 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 Board 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:

- Liberties considered the procedural aspects of the funder's funding process and reviewed them against transparency and freedom of information standards.
- Liberties determined that by accepting funding there is no inappropriate influence over the programming of the NGO.
- Liberties undertook a conflict-of-interest review with potential projects of the funder to determine that there are no conflicts.
- Liberties determined there will be no harm to its reputation if it accepts funding or associates with the proposed funder. Liberties has also determined the source of funding

to ensure compliance with applicable money laundering laws.

- Liberties 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 Liberties will 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: Liberties will not accept government funding.

Intergovernmental Funders: Liberties will accept intergovernmental funding only when the following criteria are met:

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

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

- Liberties is aware of the funder's source of the funds.
- Liberties determined that there are no conflicts in regard to the funder's mission and programs.
- Liberties reviewed the history of the foundation and found no issues/reasons that it should not accept funding on that basis.
- Liberties 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: Liberties will accept funding from corporate funders only when the following criteria are met:

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

or unethical or contradict the NGO's mission and principles.

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

- Liberties 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.

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

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

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

- Liberties has determined the funder records its collections in a complete, accurate, and verifiable manner.

- Liberties 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.

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

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

Anonymous Funding: Liberties 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:

- Liberties 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.

- Liberties has determined that there are no concerns with the manner how the anonymous funder approached the NGO, whether through themselves or through a representative.
- Liberties 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.