

## **Fundraising Policy**

### **1. Purpose**

1.1. This document sets out Bellingcat's fundraising policy. It is intended for our audience, current and prospective donors (both individual and organisational) and their advisers, to provide full transparency about the contributions we accept (or decline) and those that we solicit.

1.2. Bellingcat is an independent, nongovernmental organization which operates with help and contributions from private individuals and foundations worldwide. Bellingcat actively encourages philanthropic support, in line with its charitable status, and considers increasing such support as a key element in being able to fulfil its mission.

### **2. Solicited and unsolicited contributions**

2.1. Bellingcat receives solicited and unsolicited contributions. A contribution is solicited whenever a Bellingcat representative actively seeks it. A contribution is unsolicited when no Bellingcat representative took an active role in obtaining it. Unsolicited contributions include, but may not be limited to, contributions that arrive via direct mail or contributions made online.

2.2. Bellingcat reserves the right to refuse any contributions from individuals or institutions if the organization determines that such funds might undermine Bellingcat's credibility, independence, or reputation. Contributions linked to any form of criminal activity, terrorism or money laundering will not be accepted.

2.3. As a general matter, the policies outlined in this document apply to all solicited contributions and unsolicited contributions of more than €5,000. The Director of Operations and Financial Manager are responsible for reviewing actual or prospective contributions under the policy and these guidelines. Bellingcat representatives should always request clearance from the Director of Operations and Financial Manager prior to soliciting a contribution or if they believe an unsolicited contribution may need a review.

### **3. Fundraising principles**

3.1. Our fundraising respects and protects our independence, impartiality and mission.

- Bellingcat is impartial and independent of any government, political ideology, company or religious belief, and our fundraising activity respects and protects that.
- We raise funds in accordance with our fundraising principles. We will not solicit or accept contributions from individuals, governments or organisations that seek to influence the outcome of our investigations and compromise our independence. We will not accept contributions from sources who may adversely impact our reputation for impartiality and independence. If we turn down a contribution or offer of support, we will explain why.
- We will ensure that projects for which we raise funds reflect our mission and priorities. Neither the funding opportunities we pursue, or the requirements of funders, will deflect us from our strategic objectives.
- We will not allow any funding relationship to constrain us from criticising that body or exposing any wrongdoing in which it may be involved. We accept contributions from governments only under the terms stated in section 4.2 of this policy.

### 3.2 We are honest and transparent about our fundraising

- We are honest and behave with integrity in all our fundraising, ensuring we comply with our fundraising principles and that these comply with Dutch regulation and legislation.
- We are transparent about the funds we receive and will state all funding sources in our Annual Accounts in compliance with Dutch regulation and legislation.
- We are accountable to our supporters; whose contributions enable Bellingcat to expose wrongdoing and develop the field of open source investigation.
- We use contributions in accordance with their intended causes and provide timely updates to our supporters explaining how we have used their contributions.

### 3.3 We use our funds responsibly

- We put our supporters' contributions to work as quickly as we can and do this wisely and responsibly.
- We are modest and do not solicit more funds than we need to further our mission. We are grateful for all support, large and small.
- We keep our operating costs at a minimum, so your support goes directly to our work, not to exorbitant salaries or fundraising campaigns.

### 3.4 We respect our supporters' privacy

- We respect our supporters' privacy and right to decide how and if Bellingcat contacts them. We make it easy for supporters to choose how they want to hear

from us, and if they ask us not to contact them we won't, unless it is a legal or administrative requirement.

- Our fundraising activity is carried out in accordance with our data protection policy and procedures. We will never sell our supporters' data, or share it outside of Bellingcat.

## 4. Donors

### 4.1. Private Foundations and Lotteries

- Bellingcat focuses its fundraising efforts on private foundations/lotteries whose values align with ours.
- We will not solicit or accept contributions from private foundations/lotteries that might use their funding relationship with Bellingcat to influence the outcome of Bellingcat's investigations and compromise our independence, or with whom association would risk our reputation.
- We will not allow any funding relationship to constrain us from criticising that body or exposing any wrongdoing in which it may be involved.
- We accept support from these bodies under the stated terms for expenses related to general operating costs and project costs.

### 4.2. Government institutions

- Bellingcat will not solicit or accept funding and contributions directly from any national government, with the exception of funding that is distributed by a private foundation that accepts government funds, so long as it is independent from any national government.
- Bellingcat can solicit or accept contributions from international or intergovernmental institutions such as the European Commission or the United Nations.
- We will not solicit or accept contributions from government bodies that might use their funding relationship with Bellingcat to influence the outcome of Bellingcat's investigations and compromise our independence, or the association with whom would risk our reputation.
- We will not allow any funding relationship to constrain us from criticising that body or exposing any wrongdoing in which it may be involved.
- We accept support under the stated terms only for expenses related to the execution of project specific activities.

### 4.3. Individuals

- Bellingcat will not solicit or accept contributions from individuals that might use their funding relationship with Bellingcat to influence the outcome of Bellingcat's investigations and compromise our independence, or with whom association would risk our reputation.
- We will not allow any funding relationship to constrain us from criticising that person or exposing any wrongdoing in which s/he may be involved.
- We accept support under the stated terms for expenses related to general operating costs and project costs.

#### 4.4. Corporations

- Bellingcat will not solicit or accept contributions from corporations that might use their funding relationship with Bellingcat to influence the outcome of Bellingcat's investigations and compromise our independence, or with whom association would risk our reputation.
- Bellingcat will not solicit or accept contributions from corporations who are a focus of Bellingcat's work or a direct competitor of a corporation that is the focus of our work.
- We will not allow any funding relationship to constrain us from criticising that corporation or exposing any wrongdoing in which it may be involved.
- We accept support under the stated terms for expenses related to general operating costs and project costs.