

Greenpeace Nordic Policy on Relationships with Third Parties and Fundraising

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1. Introduction

This policy aligns the work and people of Greenpeace Nordic with the global Policy on Relationships with Third Parties and Fundraising which was approved by the International Executive Directors in February 2019.

This policy does not relate to the selection of vendors or our procurement requirements, this is available in our Greenpeace Nordic Purchasing and Procurement Policy.

Greenpeace is dedicated to protect the planet in all its diversity and to promote peace and non-violence. Our mission is protecting environmental boundaries whilst challenging power dynamics and changing mindsets in order to create long term effective system change. We believe that people have the power to create this change.

A key core value that underpins this work and our mission is our independence - notably being independent from corporate and political interests. In whatever Greenpeace does, as we look to create system change and challenge power dynamics, this independence cannot be compromised.

We have to maintain our independence in line with our beliefs but that does not mean we have to be isolationist and try to operate as a lone hero. Let us be bold. Let us join forces with our allies. Let us build the new systems for that green and peaceful world that we all know in our heads and in our hearts is possible.

Therefore Greenpeace supports relationships with third parties that further the aims of Greenpeace, that help defend environmental boundaries, or that help to engage the public and change mindsets, as long as they do not compromise the independence of Greenpeace or our financial resilience. If in doubt, and if there could be a justified risk that Greenpeace will jeopardise its independence, we will cease that relationship because our mission is too important.

All relationships with third parties should therefore:

- Contribute to the advance of our mission and be compatible with Greenpeace's environmental aims. Balance defending environmental boundaries, changing mindsets and challenging power dynamics.
- Be true to the core values of Greenpeace and protect the use of the Greenpeace name. These values and guidelines are reflected in the Nordic Code of Conduct.¹
- Protect Greenpeace's independence, while providing a framework within which the organisation can create engagement and raise and maintain a sustainable income.
- Be compatible with Greenpeace's integrity and subsequent public reputation as an active, independent, international and credible network.
- Take into account the possible effects on other Greenpeace NRO's from the activities conducted here in Nordic.

Cross Border Relations

When Greenpeace Nordic engages in interaction with a multinational player, we have the responsibility, prior to the interaction, to communicate internally with all Greenpeace NROs that reasonably can be expected to be affected by the interaction. In all cases GPI should be given prior information in order to keep an overview and identify potential conflicts.

¹ [Greenpeace Nordic Code of Conduct](#)

Approval of communication by third parties about Greenpeace in Nordic is the responsibility of the relevant Director/s and Fundraising or Programme Manager/s for that country, with support from the Head of Communications. Discussions and decisions should be documented. It is however important to remember that this is not about creating additional bureaucracy or red tape with oversight for no reason, this is about staying true to who we are, our core values and principles and the vision we are looking to achieve.

Our Responsibility to Our People

At Greenpeace we have the honour that our work in pursuit of a green and peaceful future is funded almost entirely by donations given to us by passionate individuals from all over the world who care about the planet, share our values and want to help us create change.

For Greenpeace to be effective in our campaigning work our independence is vital which is why we must have it as a core principle that guides all of our relationships. If we identify anything that could compromise our independence, our integrity or deflect from our campaign priorities then we should not enter into that activity.

If we don't, not only could it undermine progress against our key campaign goals and generate bad publicity, our core supporters could also see it as a betrayal of their trust.

Giving us donations or taking campaign actions allows people to stand together with our campaigners and our activists and help bring about much needed change. Without them we cannot create the change we wish to see in the world, because of this we need to think about treating them with respect in every decision that we make.

2. Fundraising

a. General Principles for Fundraising

- i. Greenpeace relies upon the voluntary donations of individual citizens and grant support from foundations to fund its work. Greenpeace does not solicit or accept funding or cash donations from government, corporations², political parties or supranational governmental bodies such as the United Nations or the European Union.
- ii. Greenpeace does not seek or accept donations that could compromise its independence, aims, objectives or integrity, including gifts from individuals. Funds are only raised on the basis of campaigns or other activities undertaken or supported by Greenpeace (past, present or future).
- iii. Greenpeace reserves the right to refuse any donation. Notably, Greenpeace will refuse or investigate any offered donation if indicators are identified that such offer may be related to money laundering or proceeding from financial or other crime, and if so, or when in doubt, Greenpeace will refuse such donation. A list of indicators and process for identification will be established and regularly reviewed and updated.³
- iv. Greenpeace Nordic screens all gifts of 50,000 SEK, 40,000 DKK, 50,000 NOK or €5,000 and above. Screening means that a check is made to ensure that the gift has been donated in a way or by a party that would not contravene the organisation's principles as stated in this policy. Such gifts when identified will be rejected.
- v. Our people are our most valuable asset and mechanisms must be in place to

² We define corporations as for-profit legal entities that exist independently of individuals.

ensure accountability towards them through transparency and high reporting standards. Greenpeace is open and accountable to its volunteers, staff, supporters, the public, media and regulatory bodies on how its income is raised and spent and the proportion of expenditure committed to all areas of its activities, including fundraising. This information will always respect security and local data protection legislation.

- vi. Greenpeace Nordic may not approach a Major Donor or Foundation located within the territory of another Greenpeace NRO for funds, without the prior agreement and signed approval from the NRO's FRD or other Director holding responsibility for fundraising that is home to the Major Donor or Foundation and the Greenpeace Nordic FRD.
- vii. When engaging in cross-border fundraising it is acceptable that a reasonable portion (up to 10%) of the grant is retained by the fundraising NRO for administrative costs related to managing the gift or grant on behalf of the campaigning NRO.
- viii. In the case that donors are recruited from another NRO's territory through online fundraising, the donors' details should be returned to the country in which the donor lives to be cultivated by that NRO:
 - if that is legally possible
 - if this is in accordance with the donor's wishes and they have given explicit consent. The initial donation remains with Greenpeace Nordic.
- ix. Greenpeace Nordic may accept cryptocurrencies, but it must be ensured that accepting any coin does not expose Greenpeace to unreasonable risk or brand exposure. Examples might include accepting coins with high energy consumption, high fraud risk or volatility, or local regulatory risk.³
- x. Greenpeace Nordic may use examples of other NROs' work for fundraising, even if that particular NRO does not directly or indirectly pay for or directly participate in that specific campaign. People give to Greenpeace to protect the environment, wherever that may be in the world.
- xi. Greenpeace Nordic conducts (and requires suppliers, when acting for Greenpeace, to conduct) their fundraising in accordance with the law and where feasible, in line with professional codes promoted by the appropriate fundraising, marketing and advertising institutes that operate in their country, or this document in case that these do not exist nationally.
- xii. In the case of workplace giving, Greenpeace Nordic will not accept the company matched portion of an individual's donation. This can be either returned to the company or passed through to another like-minded environmental organisation. To pass this donation on requires the approval of both the FRD and PD.

b. Specific Cases in Fundraising

i. Fees for Services⁴

Individuals acting in their capacity as Greenpeace representatives

³ When looking at cryptocurrencies we should take into account: 1. The impact of mining new coins on energy consumption. "Proof of work" coins (Bitcoin, litecoin, ethereum) are generally problematic, "proof of stake" tends to be better. 2. The anonymity properties of the coin, and how this impacts our independence. 3. The nature of any associated ICOs and their likelihood to impact our brand. 4. The impacts of local tax or other legislative instruments on processing the donation.

⁴ This does not include the use that a freelancer or an agency hired by Greenpeace can make of any product (e.g. photos) after being used by the organisation. This will be specified in each case through the contract. Ref to the Greenpeace Nordic [Code of Conduct](#).

(employees or volunteers) do not perform paid services as consultants, or in similar duties to other entities. Greenpeace staff and volunteers may not accept gifts or entertainment of the type that could be considered as a financial incentive in the specific circumstances. Speaker's fees are not acceptable, unless they come from other organisations (not companies or public institutions) and as long as they are not paid directly to the employee but to Greenpeace.

- ii. Product/services sales/reward or affinity programs
Receiving portions from product/services sales are acceptable if they do not jeopardise Greenpeace's credibility and are customer/donor driven. This means that the customer/donor takes the decision and is aware that part of the purchase price is going to Greenpeace. The commercial conditions for this should be outlined in a (licence) contract. This refers to 'promotions / actions' where consumers may choose to pay a small fixed amount on top of the regular sales price which will go to charity - so the portion must be clear.
- iii. Lotteries
Lotteries are an acceptable source of income. They can be lotteries in our own name or third party lotteries that reserve a substantial part of the turnover for good causes. To guarantee our independence in the case of taking money from lotteries, they should be run in accordance with the law to define what body or entity decides on the income destination, and if there is an agency involved in the management of the grant. The procedures must not jeopardise Greenpeace's credibility and should be reflected in our reports.
- iv. Events
It is acceptable for Greenpeace to receive funds when it is recognised as a beneficiary at events, in which there may be a request to use the Greenpeace logo in accompanying materials. This could only happen provided the event is not designed to benefit a company or with a commercial purpose. Examples of acceptable events are the ones organised by civil society groups, events organised by media, events organised by any of our regular vendors (e.g. agencies). The relevant Director/s should decide if there is a risk of reputational damage or campaign controversy in being the beneficiary of a specific event because of the organiser entity.
- v. Fundraising and children
Greenpeace does not seek funds from people under age and does not use their data in fundraising campaigns.
- vi. Fundraising using third parties images
When there are specific restrictions regarding the use of certain images and footage for fundraising purposes Greenpeace Nordic will comply with those laws. This may mean that in our fundraising activities we cannot make use of images involving third parties without specific authorisation. For ethical reasons we will also be careful when using images of vulnerable groups, such as indigenous communities, children, workers, non-Greenpeace activists etc.
- vii. Foundations
Greenpeace Nordic does not seek or accept funds from Foundations that could jeopardise or independence or that attach unreasonable conditions or constraints upon Greenpeace activity. All donations from Foundations

should be used to fund projects aligned with Greenpeace plans and campaign strategies. Greenpeace Nordic will screen all Foundations⁵ to ensure they are lacking corporate and government ties. The kind of Foundations that Greenpeace cannot receive funds from include but is not limited to:

- Foundations that currently receive their income from political parties.
- Foundations funded and controlled by organisations such as the European Union or the United Nations.
- Foundations that are established as a legal platform for corporate giving or have strong links to a corporate entity.
- Foundations funded and controlled by governments.

Greenpeace will provide the financial, programmatic, periodic and final reports to a foundation as specified as a condition of receiving a grant.

viii. Allocated funds

For the majority of its fundraising activity Greenpeace does not actively seek "restricted" or "designated" funds, that puts a legal and/or moral obligation to spend it on a specific project or country. On occasion we may use tangible examples for what a supporters' money could do, but make it clear that these are illustrative, and the money will go where the need is greatest. Exclusions to this are on high value giving from individual major donors and Foundations. In the final instance Greenpeace retains the right to refuse a gift on the grounds of any unworkable restrictions placed upon it.

ix. Crowdfunding

Crowdfunding campaigns for specific projects are also a regular practice, using platforms outside of our own channels or tools.

x. Legacy Fundraising

Greenpeace will respect the privacy of all of our legacy prospects and donors, unless we have the express permission of that person (and if appropriate their family) to promote their acts. The decision to include Greenpeace in a Will should be made as and when the prospect wants to make this decision, and every person has the right to change their mind even if they have told us that they have included Greenpeace in their Will. Greenpeace will follow ethical and regulatory guidelines issued by national fundraising professional associations to ensure that legacy information is promoted in a way that adheres to best practice. We respect the decisions of our supporters to give the type of legacy they want to give, and we will fulfil the requirements supporters might have concerning the use of their legacy provided that it fits in our campaign plans and regular practice. Legacies given with an accompanying restriction that we cannot meet, will be refused.

xi. In-kind Gifts

Any gift-in-kind exceeding €1000, or equivalent in local currencies, should be approved by the FRD. Any gift-in-kind exceeding €5000, or equivalent in local currencies, should be approved by the ED and made public in the annual report.

- We do not offer receipts for tax purposes for Gifts-in-Kind
- Sponsorship from one company to another with the intention to

⁵ See the [Greenpeace Nordic Screening of Foundations Procedure](#)

offer a gift-in-kind to Greenpeace is not acceptable.

- Free advertising space, or a specific advertisement discount for NGOs, is acceptable if this does not jeopardise Greenpeace's credibility.

c. **Anonymity and Supporter Confidentiality**

In our public reports, e.g. our Annual Reports, we will be transparent about the level of Major Gift / Foundation support we receive, but we will not share any other donor information unless expressly asked by the donor. The same applies for legacy prospects and legacy donors.

3. Data Protection and Management

- a. All Greenpeace Nordic people will adhere to our GDPR policies and associated requirements. These can be found [here](#).
- b. Greenpeace will never share or sell lists of our constituents.

4. Vendors and Providers

a. **Service providers restrictions**

Greenpeace Nordic aims to get the desired product or service with the best quality and the least possible ecological impact. All Greenpeace people are responsible for following the recommendations of the Greenpeace campaign policies in each one of its areas as well as the following policies:

[Greenpeace Nordic Purchasing and Procurement Policy](#)

[Nordic Food Procurement Policy](#)

[Environmental Policy 2013](#)

[100% Renewable Electricity Purchasing Policy 2011](#)

[Green IT Policy](#)

b. **Testimonials**

The use of Greenpeace testimonials in support of specific pieces of work done for Greenpeace, or to be listed as a customer of one of our suppliers on a website, on social media or in a brochure is acceptable, but needs to be decided on a case by case basis by the relevant Director/s, and in cases of international significance, by the Head of Global Comms.

5. Campaign Driven Relationships

a. **Alliances with civil society**

- i. Alliances with other civil society groups shall be encouraged as long as they have a significant potential for winning our priority campaigns, and/or strengthen our ties with civil society and contribute to our mission. This is reflected in our strategic plans as fundamental for Greenpeace, and exploration of new kinds of interactions with civil associations and institutions is recommended, always in the frame of our core values of peaceful action and political/financial independence.
- ii. When entering into such an alliance for a long period (e.g. a three to five years project), and planning to make public activities together, a cooperation agreement should be made outlining the goal of the alliance, the time frame, the responsibilities as well as a communications protocol.
- iii. We may use our logo for joint initiatives with other NGOs which serve the purpose of our programme and are in line with our values.
- iv. On occasion Greenpeace could act as a sponsor for other campaign

organisations. Those projects should always be aligned with Greenpeace programs and values. When the sponsor includes financial support, Greenpeace will ask for a proper report of the use of our supporters' donations.

b. Alliances with business and governments

- i. Our independence is a core value. We have no permanent enemies or friends. Initiatives with business and governments - even unusual ones – can be encouraged as long as they have a significant potential for succeeding in one of our priority campaign areas and do not undermine our political independence. These joint initiatives are time limited and must not compromise our values and our credibility.
- ii. If in these relationships a third party is allowed to use our logo, this permitted use shall be restricted to the relevant territory, a relevant time frame and the relevant campaign. Where global repercussions might occur, permission has to be given by the International Executive Director (IED). In all cases of national relevance the Executive Director (ED) is the decision maker.
- iii. We should not allow any commercial brand to use our logo or any materials produced for campaign purposes (as videos, macros etc) for advertisement of a commercial product.

There are more specific guidelines on this area that complement this policy.⁶

6. Key Influencers Relationships

- a. Greenpeace Nordic will do due diligence to research an individual before asking them to advocate for our organisation or campaigns, to reduce the risk of reputational damage.
- b. Greenpeace Nordic has an assigned Coordinator of Key Influencers who is responsible for the oversight of relationships with Key Influencers in the Nordic countries.
- c. Greenpeace Nordic is responsible for building and maintaining the relationship with Key Influencers in our region, i.e. those with permanent residence, citizenship or nationality except in mutually agreed circumstances, where there is some reason that it is more appropriate for someone else to manage them (ex. global projects).
- d. If an NRO wishes to work with a Key Influencer who is based in (or whose fan base is primarily based in) another NRO's territory, that NRO's permission is required before an approach can be made. In situations where a Key Influencer can be considered to have more than one base (e.g a Key Influencer who was born in Sweden but has now relocated to the US) then the agreement of the Coordinator of Key Influencers in both territories is required.

Related specific policies and procedures

The relevant Nordic protocols and procedures for implementation of this policy are:

- Greenpeace Nordic Foundation Screening Procedure
- Greenpeace Nordic Major Gifts Screening Procedure

Other relevant Nordic policies that relate to this policy include:

- Code of Conduct

⁶ [Political Independence Guidance](#)
[Corporate Campaigning Protocols](#)

- Personal Data Breach Policy
- GPN HR Data Retention and Deletion Policy
- Privacy and Data Protection Policy
- Data Subject's Rights Policy
- Data Retention and Destruction Policy
- Purchasing and Procurement Policy
- Food Procurement Policy

The relevant associated documents are:

- Template: Foundation Screening
- Template: Major Gift Screening
- Template: Key Influencer Screening

Monitoring and documentation

Responsibility for the implementation of this policy is delegated from the Executive Director to the relevant departmental Director/s.

Handling a violation

If any person is found to have breached the policy, they may be subject to our disciplinary procedures as outlined in our Code of Conduct and / or other HR Policies, Protocols and Procedures.

If a criminal offence is considered to have been committed further action may be taken to assist in the prosecution of the offender(s).

Validity and revision status

To be reviewed every fifth (5) year, or sooner if appropriate.