

EEB Due Diligence Policy for Donors

As adopted by the Board at its meeting on 25 June 2026

Introduction

This document replaces the previous “EEB’s Fundraising Policies” adopted by the Board at its meeting 14 July 2011 and updated 5 November 2017.

The EEB Board adopted this EEB Due Diligence Policy for Donors during its meeting in Brussels/online on 25 June 2026 with the objective to provide more detailed guidance regarding due diligence criteria for both institutional/public and private donors including philanthropic foundations, donor advised funds (DAFs), individual philanthropists and companies.

1. Context

In order to achieve its non-profit purpose, the EEB may engage in a wide range of activities and raise funds in many different ways as described in Article 3 of its Statutes.

The receipt of funds from any source outside of the fees provided by its members are important sources of income in support of the mission of the EEB and for the implementation of the Long-Term Strategies and annual Work Programmes adopted by the General Assembly. At the same time, **external funding can come with risks to the independence of the EEB and/or result in reputational damage**. Clear and robust due diligence criteria that help to assess donors before entering new partnerships are of utmost importance to avoid any such risk

To ensure its independence, the EEB strives for **diversity among its funding sources** to prevent the risk of too much influence from any single donor. Even though the EEB receives funding from a very broad range of different donors, it needs to continually ensure **its independence of thought and action** from any donors' potential influence.

Philanthropic foundations are currently the largest source of income for the EEB while it has also started to receive funding through donor advised funds (DAFs). The EEB also receives significant funds from a range of European Union funding programmes, international organisations and national governments, that is, institutional donors. The EEB has also started to seek individual donations through calls for support weaved into its weekly newsletter.

The EEB may accept funding in the form of core grants and operational grants, unrestricted funding, project grants or grants supporting more long-term programmes, organisational development or resilience support as well as sponsorships. The criteria described apply to all types of funding.

This policy sets out **due diligence criteria that guide the EEB's fundraising activities and its engagement with donors**. It covers private donors including philanthropic foundations, donor advised funds (DAFs), individual philanthropists (i.e., substantial individual giving through donations or legacies) and companies as well as institutional donors including EU Funding Programmes, government funding and grants offered by international organisations. This policy does not contain specific guidance regarding individual giving through small donations (e.g. through public calls for donations or crowdfunding).

The **Secretary General and the EEB Secretariat are responsible for fundraising** and may pursue funding from donors that they find to be **in line with the criteria set out in this policy**. When the Secretary General is in doubt as to how to interpret the policy or wishes to get a second opinion, they will refer the matter to the Board to decide on the matter. The Secretary General is responsible for reporting back to the Board and for keeping the Board and member organisations informed about ongoing and upcoming partnerships with new donors.

2. General

In considering whether to accept funds from a donor, the following will be ensured at all times:

- the EEB's independence from the influence of any private or public entity;
- the EEB's impartiality including the influence from any political party, government or authority;
- the absence of any conflict of interest between the objective and mission of the EEB and the funder;
- the protection of the EEB's reputation and credibility;
- the orientation of the funded activities with the EEB's vision, mission, Long-Term Strategy and annual Work Programmes, or approval by the EEB Board of additional activities as acceptable additions to the Work Programme.
- that, based on publicly available information, potential donors are not subject to applicable EU or international sanctions and that funding does not originate from illegal activities.

A due diligence assessment (see Annex I) will be carried out before entering a new partnership or when an existing donor has changed their priorities, mode of operation and/or sources of income.

At the EEB Secretariat, project managers perform due diligence checks following an internal protocol in place for assessing potential funders. The outcome of the due diligence checks is reviewed by the Fundraising Team, which includes the Secretary General and members from the EEB Senior Management Team.

Transparency and accountability

The European Environmental Bureau (EEB) will always act in a trustful manner, and practice high standards of transparency and accountability when it comes to its funding sources.

The EEB will use its Annual Report to report about its funding sources.

It will ensure that all legal requirements pertaining to accountability and transparency are fulfilled, including through audits.

Organisational responsibility

The EEB Secretariat will always be able to describe and explain its decisions when entering new partnerships with donors and during a partnership.

Complaints from the public on any matter covered by this policy can be made through the EEB Complaints Mechanism or through the Whistleblowing Mechanism (through the EEB website).

Responsible allocation and use of funding

Funding received may only be used for what it is aimed for. Otherwise, the donor will be notified to either request a change to the grant agreement or for repayment of the remaining funds.

Funding in violation of this policy or EEB values

EEB will refuse donors and funding incompatible with this or other EEB policies.

3. Criteria applying to specific types of donors

Sector-specific exclusions

First, the EEB denies funding, gifts or support in kind from **any private donor**, that is, a foundation, an individual philanthropist or company, which it finds – through credible and publicly available information – to **generate their income through or retains active involvement** in the following industries: (i) **weapons and military equipment**; (ii) **tobacco**; (iii) **pornography or prostitution**; (iv) **nuclear energy** and mining of **uranium**, (v) **fossil fuel** extraction and production, (vi) **unsustainable logging of natural forests**; (vii) the production of **hazardous chemicals and pesticides** and/or **virgin plastic**.

Exclusion of funders due to negative impacts

Beyond the exclusion of the above-mentioned sectors, the EEB will also not receive any type of support from any foundation, individual philanthropist or company that has been found to be responsible for or linked through their income-generation to:

- child labour or forced labour;
- widespread, systematic and/or serious violations of human rights, labour rights and/or any other key provision under international law;
- corruption, fraud, money-laundering or tax evasions;
- widespread environment and ecosystem destruction or severe pollution;
- systematic discriminatory action;
- systematic attempts at greenwashing their operations;
- economic activity profiteering from war, taking advantage of situations of occupation

and/or in contradiction to internationally agreed sanctions against (alleged) war criminals or warmongers.

Compliance, credibility, non-severity and continuous improvement

Very probably, no source of funding is ever going to be free from any environmental, labour rights and/or human rights impacts that is linked to the original source of income. Bearing that in mind, the EEB may accept funding from private funders whose income is generated through economic activities that have an environmental and/or human and/or labour rights impact, provided that these activities are conducted in compliance with applicable laws and regulations and/or that the funder demonstrates credible, transparent, and measurable efforts to reduce negative impacts and improve environmental performance; and that the environmental and human harm associated with their activities is not serious, widespread, systemic, or linked to illegal practices or sectors explicitly excluded under this policy.

Acceptance of such funding is contingent on the funder's alignment with the EEB's values, respect for human rights and labour rights, and a demonstrable commitment to continuous improvement.

Moreover, the EEB will also assess whether funds, for instance, from a foundation or individual philanthropist, are directly linked to current (and potentially harmful) economic activities, or if the funds are linked to wealth created through economic activities of the past, that is, the foundation not being directly linked to current economic activities and being independent from direct influence of a company.

Given no source of money will be able to claim to be free of harm, decisions to accept funding from a private donor, that is, a foundation, an individual philanthropist or company, are taken on a case to case basis, assessing the seriousness of any known harmful impacts, the distance and independence of the donor from the harmful activity in time and direct responsibility, the credibility of the donor's efforts to reduce any negative impacts, any risks to the EEB's reputation, independence or impartiality, and the ultimate test of whether the donor relation can enable the EEB to advance towards its mission and vision.

Exclusion of institutional funders

Similarly, there is probably no government or institutional funder that is not, directly or indirectly linked to negative environmental harm, human rights and/or labour rights violations. Bearing that in mind, the EEB will not accept any form of financial or in-kind support from public authorities, governmental bodies, state-owned enterprises, or intergovernmental institutions that have been found, through credible and publicly available information, to be responsible for serious, widespread, or systematic violations of human rights, humanitarian law, labour rights, or fundamental freedoms; to engage in or tolerate severe environmental destruction or persistent non-compliance with environmental protection regulations; to restrict civic space, including through intimidation or repression of civil society, journalists, or human rights defenders; or to act in contradiction to internationally agreed sanctions or norms. Public funding will only be accepted when the institution demonstrates respect for the rule of law, adherence to international human rights and environmental standards, and a commitment to safeguarding democratic participation and civic freedoms.

Given no government and institutions will be able claim not to be linked to any harm, decisions to accept funding from a public funder, are taken on a case to case basis, assessing the seriousness of any known harmful impacts, the distance and independence of the funder (e.g. a Ministry or a specific public funding programme) from the harmful activity in time and direct responsibility, the credibility of the donor's efforts to reduce any negative impacts, any risks to the EEB's reputation, independence or impartiality, and the ultimate test of whether the donor relation can enable the EEB to advance towards its mission and vision.

Anonymous funders

The EEB may exceptionally accept donations from funders who request public anonymity. Anonymous donations are only permitted when:

- the donor's identity is known to the EEB internally and all due-diligence requirements are fully met;

- the donation is of limited size and does not create strategic, political or reputational influence;
- the EEB is satisfied that the request for anonymity is based on legitimate reasons, such as the modesty of the donor, and does not conflict with the EEB's transparency commitments;
- anonymity does not prevent the EEB from complying with legal, financial or reporting obligations.

The EEB reserves the right to decline anonymous donations if the conditions above are not met or if anonymity could compromise the integrity, independence, or transparency of the organisation.

In addition, the EEB will deny any support that directly or indirectly originates from any other activity that is incompatible with the EEB's values and working methods.

3. Independence and safeguarding clause

The EEB maintains full independence in all its positions, advocacy, and public communications, irrespective of any financial or in-kind support received:

- All partnerships and funding arrangements must respect the EEB's unconditional right to publicly criticise the funder for any actions, policies or practices that harm the environment, undermine human rights or contradict the EEB's mission.
- The EEB reserves the unilateral right to suspend or terminate any collaboration if the funder's conduct violates the EEB's values, breaches international or national law, or creates a conflict with the EEB's strategic objectives.
- Any communication regarding the collaboration, including public announcements, visibility, or acknowledgement of support, must be agreed in advance and must not imply endorsement of the funder's activities. The use of EEB's name or logo is permitted only with explicit written consent, for clearly defined purposes, and may be revoked at any time if the use risks misleading the public, compromising EEB's independence or damaging its reputation.