

Fairtrade Australia & New Zealand **Fundraising Policy**

1. Purpose

Fairtrade Australia and New Zealand (Fairtrade ANZ) is a public benevolent institution with deductible gift recipient status.

Fairtrade ANZ is committed to ensuring that all fundraising activities carried out by or on behalf of Fairtrade ANZ occur in an ethical and transparent manner, protecting donor, Fairtrade ANZ and primary stakeholders.

The purpose of this policy is to make clear Fairtrade ANZ's position on fundraising and to document the process and standards that apply when considering whether or not to accept financial or in-kind donations from private organisations or members of the public.

Fairtrade ANZ acknowledges the importance of maintaining high ethical practices with fundraising methods and distribution to strengthen public trust in the sector.

Fairtrade ANZ reserves the right to decline any donation, gift or sponsorship.

2. Related Policies

- Anti-Fraud and Corruption
- Communications Protocol
- Complaints Handling
- Control of Resources
- Counter-Terrorism
- Disability Inclusion
- Gender Equity
- Locally-Led
- Partnerships
- Protection from Sexual Exploitation, Abuse and Harassment
- Protection of Children and Vulnerable Adults
- Risk Management Framework
- Separation of Development from Religious and Political Activities
- Whistleblowing Protection

3. Related legislation

Australia: Criminal Code Act 1995, National Anti-Corruption Commission Act 2022, Australian Charities and Not-for-profits Commission Act 2012, Charities Act 2013

Aotearoa New Zealand: Crimes Act 1961, Charities Act 2005, Anti-money laundering and Countering Finance of Terrorism Act 2009

4. Scope

This policy applies to:

- All Fairtrade ANZ staff, contractors, volunteers and Board and Committee members
- All partners and stakeholders, who are directly or indirectly engaged with Fairtrade ANZ's fundraising work both domestically and internationally.

For the purposes of this policy, fundraising refers to the receipt of donations and contributions from the public or private sector, and is distinct from formal delivery partnerships, procurement agreements, institutional donor grants (such as DFAT funding), or licensing arrangements. These other arrangements are governed by Fairtrade ANZ's Partnerships Policy, Procurement Policy, Grant Management Procedures, and Licensee Agreements respectively.

5. Definitions

Donation means a voluntary contribution by a donor of money, property, goods or services to Fairtrade ANZ to further its charitable purpose.

Donor: An individual or entity that makes or has made a contribution to Fairtrade ANZ.

Fundraising activity: An activity conducted to raise funds for Fairtrade ANZ's charitable purposes.

Fundraising material: Any material (print, digital, or verbal) used in connection with fundraising.

Intended recipients: Refers to those for whom the resources raised by Fairtrade ANZ are intended — including Fairtrade ANZ itself when funds are used for work aligned with its charitable purpose, as well as our primary stakeholders (such as smallholder farmers, workers and producer organisations), local partners, and stakeholders engaged in or benefiting from Fairtrade ANZ's programmes in Aotearoa New Zealand, Australia, or internationally.

Primary stakeholders: the smallholder farmers, workers, communities and organisations Fairtrade ANZ partners with and supports through its programmes and fundraising activities.

6. Guiding Principles

Fairtrade ANZ adopts the following principles for all fundraising activities:

Principle 1: Honesty

Fundraising must be conducted truthfully and transparently.

Principle 2: Accountability

Use of funds must be transparent and documented.

Principle 3: Empathy

Fundraising should respect the dignity and agency of all people involved.

Principle 4: Integrity

Ethical behaviour and avoidance of conflicts of interest are essential.

Principle 5: Continual improvement

Fairtrade ANZ commits to learning and improving fundraising practice.

7. Policy

Acceptance and use of donations

Fairtrade ANZ may accept donations from individuals, corporate entities, philanthropic foundations, and other private or public sources. All fundraising activities carried out by or on behalf of Fairtrade ANZ must comply with:

- all relevant fundraising laws in Australia and Aotearoa New Zealand
- the [ACFID Fundraising Charter](#)
- this policy.

All funds raised must be used for their stated purpose (if any) and must support Fairtrade ANZ's charitable objectives.

No one directly or indirectly employed by or volunteering for Fairtrade ANZ may accept commissions, bonuses, or personal payments related to fundraising conducted on behalf of the organisation.

Fairtrade ANZ does not conduct unsolicited door-to-door or telemarketing-based fundraising activities.

All proposed fundraising activities, donations, and fundraising materials must be assessed and approved in accordance with this policy and Fairtrade ANZ's Communications Protocol.

Fairtrade ANZ will conduct screening of all donations and donors in line with Anti-Money Laundering and Counter-Terrorism Financing legislation in both Australia and Aotearoa New Zealand. High-risk or foreign donations may require enhanced due diligence.

Donations from disreputable sources

Fairtrade ANZ will not accept donations from individuals or businesses directly involved in:

- Arms and weapons
- Tobacco
- Alcohol
- Gambling**
- Illegal drugs
- Adult content (e.g. pornography).

** discretion may be applied to accept donations from government backed public lottery funds, subject to a formal risk assessment and Board approval.

Fairtrade ANZ will also not accept donations from any individual or entity known to be involved in:

- serious human or labour rights violations
- significant environmental destruction
- systemic corruption or unethical business practices

Any donation over AUD/NZD 50,000 will be subject to a formal risk assessment in accordance with Fairtrade ANZ's Risk Management Framework, which includes reviewing the donor's record for disreputable activity, including its materiality, gravity, frequency, and response.

Fairtrade ANZ will not accept donations from political parties. Donations from politicians or public servants will be subject to the same risk assessment process as other individual donors.

Anonymous donations

Fairtrade ANZ may accept anonymous donations. However:

- We cannot issue a donations tax receipt that a donor can use for a tax credit without the donor's full name, as required by Charities Services/IRD guidance.
- Anonymous donations of AUD/NZD 50,000 or more (or any amount deemed higher risk) will be subject to a formal risk assessment in accordance with Fairtrade ANZ's Risk Management Framework.
- We will maintain internal records sufficient to meet governance, audit, and risk obligations, while protecting donor anonymity publicly. Where necessary, Fairtrade ANZ may request that certain financial details are withheld from public disclosure to protect donor anonymity, consistent with Charities Services guidance.
- If a donation (particularly cash) raises concerns about legality, source of funds, or terrorism financing, Fairtrade ANZ will decline or return the donation and/or file a report with the appropriate authority, consistent with the AML/CFT Act and our Complaints Handling and Whistleblowing Protection Policies.

Risk assessment and decision-making

All fundraising activities and donations will be assessed under Fairtrade ANZ's Risk Management Framework. This includes reviewing whether the proposed donation or activity:

- aligns with Fairtrade ANZ's objectives and values
- creates actual or perceived conflicts of interest
- complies with all internal policies
- upholds the interests of primary stakeholders
- protects Fairtrade ANZ's independence and reputation
- avoids creating unacceptable legal, financial, or operational risks

An internal checklist will be used to guide consistent decision-making. The CEO may request additional information from donors if needed.

Fundraising materials

All fundraising materials must:

- include Fairtrade ANZ's identity including name, address, ABN and purpose
- accurately represent the context, situation, proposed solutions and intended meaning of information provided by affected people
- show respect for primary stakeholder's dignity, identity, values, history, religion, language and culture
- clearly state if there is a specific purpose of each donation
- avoid material omissions, exaggerations, misleading visual portrayals and overstating the need or what the donor's response may achieve.

Images and stories must not:

- be untruthful, exaggerated or misleading
- threaten the dignity and privacy of the primary stakeholders
- endanger or exploit the people they are portraying
- be used only with informed consent (including for children and vulnerable people)
- present people in a dying or dehumanising manner
- infringe any of Fairtrade ANZ's policies, including Disability Inclusion, Locally-led and Racial Justice, Protection from Sexual Exploitation, Abuse and Harassment, Protection of Children and Vulnerable Adults, and Whistleblowing Protection Policies.

All materials must be approved by the CEO or delegate in accordance with the Risk Management Framework and Communications Protocol.

8. Rights of Donors

Informing the Donor

Donors may request to be informed of:

- how their donation will be used
- Fairtrade ANZ's capacity and timeframe for delivery
- access to the most recent financial reports
- how to review and correct their donor record
- how to lodge a complaint under Fairtrade ANZ's Complaints Handling Policy or under the ACFID and/or CID Code Complaints Process.

Respecting Donors

Fairtrade ANZ will:

- acknowledge and record all donations promptly
- avoid undue influence or harassment
- seek consent before public recognition
- encourage independent advice if appropriate.

Fairtrade ANZ will comply with a donor's request to:

- receive a written receipt (if eligible)
- opt out of giving or being contacted
- limit frequency and type of communication
- not receive printed materials.

All donor data is managed under applicable privacy legislation in Australia and Aotearoa New Zealand and will be kept confidential unless explicit consent is given.

9. Third parties

Any proposal to outsource fundraising must be approved by the Board. Where approved, a written contract must:

- comply with relevant legislation in Australia and Aotearoa New Zealand
- outline all roles, responsibilities, and expectations
- require the third party to comply with this Fundraising Policy, as well as Fairtrade ANZ's Procurement Policy, Risk Management Framework, safeguarding policies, and any other relevant organisational policies
- ensure that Fairtrade ANZ is clearly identified as the intended recipient of the funds

10. Complaints

Complaints about Fairtrade ANZ's fundraising practices may be lodged through any of the following channels:

- Fairtrade ANZ Complaints Handling Policy
- Fairtrade ANZ Whistleblowing Protection Policy
- ACFID Code of Conduct complaints process (Australia)
- CID Code of Conduct complaints process (Aotearoa New Zealand)

Complaints will be managed fairly, confidentially, and without reprisal for individuals who raise concerns in good faith. Where relevant, complaints will be reviewed alongside the Risk Management Framework to assess any required changes in controls or procedures.

11. Compliance Reporting

Fairtrade ANZ will report annually to the Board on:

- compliance with this Fundraising Policy
- compliance with the ACFID Fundraising Charter
- any significant risks, complaints, or decisions made under the Risk Management Framework
- confirmation that any anonymous or high-value donations over the internal threshold (AUD/NZD 50,000 or otherwise deemed higher risk) were assessed in accordance with the Risk Management Framework and, if required, recorded in the Risk Register

The CEO is responsible for ensuring that any fundraising-related risks are reviewed quarterly and that the Risk Register is updated in line with Fairtrade ANZ's Risk Management Framework.

12. Document Control

This Policy is available in the shared Fairtrade ANZ drive for all employees and is available on our website.

A copy of this policy will be provided to any person or organisation on request.

13. For More Information

For more information or assistance, contact us at:

- Australia: info@fairtrade.com.au
- New Zealand: info@fairtrade.org.nz

14. Approval and Review

This policy will be reviewed at least once every three years, or earlier if required due to legislative changes, risk profile adjustments, or other organisational developments.

Version	Approval Date	
v.1	17 Feb 2021	
v. 2	2025	• Removed “beneficiaries”; replaced with “primary stakeholders” and “intended recipients” • Clarified Fairtrade ANZ may be a recipient of donations • Differentiated fundraising from partnerships, procurement, grants, and licensing • Removed FINZ reference; added Risk Management Framework • Introduced \$50,000 threshold for risk assessments (including for anonymous donations) • Strengthened anonymous donation rules (tax receipt limits, privacy law compliance) • Expanded policy references (e.g. safeguarding, procurement, AML/CTF) • Strengthened risk reporting and Board oversight responsibilities • Updated fundraising imagery and communications standards • Aligned complaints processes with ACFID and CID Codes