



## Turning Tides External Funding Acceptance Policy September 2024

At Turning Tides, we prioritize upholding high standards of ethics, integrity, and transparency in all aspects of our operations. To this end, we have established a policy to guide our decision-making regarding the acceptance of external funding. This document serves as a safeguard, helping Turning Tides make informed decisions regarding external funding acceptance – allowing us to increase funds accessible to local communities, small-scale fishers, fisher workers and Indigenous Peoples, while maintaining our commitment to ethical conduct, financial prudence, and mission alignment.

### 1. Purpose

This policy sets out Turning Tides' approach to external funding acceptance to ensure that the facility maintains its ethical standards, protects its financial stability, manages reputational risk, and remains aligned with its values and program focus. By establishing these guidelines, we aim to mitigate potential risks associated with accepting grants or gifts that could compromise our organization's integrity, expose our partners to conflicts of interest or ethics, or lead to legal liabilities.

### 2. Context

2.1. Turning Tides embraces external funding to advance its objectives, emphasizing the paramount importance of aligning with the priorities of local communities, small-scale fishers and fish workers and/or Indigenous Peoples i.e., our partners and intended beneficiaries. It is imperative that such funding adheres to transparency and ethical standards and does not compromise the integrity or reputation of Turning Tides or its partners.

2.2. Turning Tides' values and principles ([Turning Tides Strategy to 2030](#), page 7-9) guide the actions and decisions of the entire organization. These principles are reflected in the funding acceptance criteria outlined in section 3. All acceptance of funding and external income must align to the principles set forth in the strategy, and any associated guidance documents.

### 3. External Funding Acceptance Principles

3.1. Turning Tides accepts funding that aligns with our vision, values, principles, and strategies, carried out responsibly, honestly, and transparently. We prioritize integrity and mutual respect for donor needs and Turning Tides' priorities, ensuring responsive communication and alignment with our donors. We favor working with funders who share our commitment to fostering more liberatory and equitable approaches in grant-making. We are particularly aware of the importance of partnering with funders who emphasize human-centered and rights-based approaches, especially in areas and issues impacting local communities, small-scale fishers and fish workers and/or Indigenous Peoples.

3.2 Turning Tides will not accept external funding if its source may have been acquired illegally or unethically, or if there is a close connection to illegal or unethical activities. Additionally, funding will not be accepted if its acceptance could potentially harm the reputation of Turning Tides.



## TURNING TIDES

A facility supporting rights and tenure of  
coastal and shoreline communities

3.3. Turning Tides will not accept external funding that jeopardizes its autonomy, autonomy of partners (including, but not limited to, grantees), or conflicts with its commitment to liberatory philanthropic practices. We would consider funding to jeopardize autonomy if its receipt would influence grant selection criteria, grantee partnerships, operational independence, or create unacceptable conflicts of interest.

3.4. Turning Tides may decline external funding that goes against its interests. This includes, but is not limited to, funding that:

- Does not align with or contradicts Turning Tides values and principles.
- Is overly burdensome to administer and/or could result in unacceptable liabilities or future expenses for Turning Tides or its partners
- Encourages or forces the Facility to deviate from established liberatory grantmaking practices that Turning Tides has pledged to uphold.
- Is sourced from activities that are inimical to the human rights, livelihood interests or tenure rights of local communities, small-scale fishers and fishworkers, Indigenous Peoples
- Violates the terms of this policy or other policies or regulations approved by Turning Tides' governing bodies.

3.5. Turning Tides will only accept funding if the identity of the funder is disclosed. Generally, funding will not be accepted if an intermediary negotiates on behalf of an anonymous funder. Turning Tides may agree not to publicly acknowledge the funder's name, see clause 3.6, as long as their identity is made explicitly known to the facility for due diligence purposes (including checking adherence with this policy).

3.6. When a donor desires anonymity, their wish for confidentiality will be honored to the extent permitted by law, feasibility and our commitment to transparency to our partners.

3.7. To ensure the autonomy and integrity of Turning Tides processes, funders are prohibited from participating in the selection or appointment process for any position within the organization, whether paid or unpaid, including those positions associated with projects they have funded or donated to. However, funders may serve on governing, steering and/or advisory board panels in accordance with Turning Tides' guidelines on committees and boards; invitation to serve shall not be connected to or a requisite of provided funding.

3.8. If ethical concerns arise after accepting funding associated with a current or former funder of Turning Tides, all pertinent information will be brought before the Turning Tides' Steering Committee for review, deliberation and determination of appropriate action.

## 4. External Funding Acceptance Procedures

4.1. In accordance with this policy, the acceptance of external funding by Turning Tides must adhere to the External Funding Acceptance Procedures. These procedures ensure that Turning Tides will carry out ethical checks and due diligence in alignment with the ethical review criteria outlined below. Ethical review should occur before proposal submissions or contract negotiations commence. Turning Tides' staff (where necessary with the assistance of external agencies) are responsible for carrying out all due diligence and shall bring any item that could be considered in violation of this agreement to the attention of the Steering Committee for an ultimate determination and decision.



## 5. Risk criteria to be considered in due diligence

5.1. Utilizing an internal review tool, Turning Tides will evaluate external funding according to the following risk criteria outlined in this policy:

- A. Identification of serious legal, ethical, or reputational issues related to the sources of funding (funders), including, but not limited to, proven cases or allegations of:
  - 1. illegal activities;
  - 2. financial misconduct, such as tax evasion, insider trading, or corruption;
  - 3. human rights abuses, including child labor, human trafficking, or poor working conditions;
  - 4. sexual misconduct;
  - 5. engagement with terrorism or controversial political entities, anti-democratic regimes, corrupt regimes, or regimes with human rights abuses;
  - 6. egregious environmental impact and sustainability concerns; and/or
  - 7. the funder's reputation has been compromised in some way, and the behavior that led to the tarnished reputation has not been rectified or the reputation remains compromised, potentially harming relationships with our partners and other stakeholders.
- B. Accepting the funding would be unlawful or against the public interest, particularly if it infringes upon the rights or well-being of our partners.
- C. Turning Tides will carefully consider key exclusions when assessing funding, weighing both benefits and risks. This includes examining involvement in industries labeled as 'cautionary,' such as:
  - 1. Arms dealing and manufacturing, especially concerning controversial or indiscriminate weapons.
  - 2. Tobacco manufacturing.
  - 3. Animal welfare or testing.
  - 4. Pornography.
  - 5. Gambling.
  - 6. Illicit drug trafficking, illicit drug promotion and money laundering.
  - 7. Industries with significant contributions to climate change, like fossil fuel extraction, deforestation, thermal coal mining or oil/tar sands extraction.
  - 8. Industries engaged in land grabbing or displacement of Indigenous peoples, Small-scale fishers, fish workers and local communities.
  - 9. Logging and forestry operations responsible for displacement of Indigenous communities, small-scale fishers, fish workers and local communities.