

TRANSPARENCY INTERNATIONAL RWANDA

Donation policy and guidelines

February 2025

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1. Introduction

TI-Rwanda needs to secure the funding necessary to undertake its vital work. Secure and diverse funding enables TI-Rwanda to maintain its independence, protect its reputation and operate effectively.

TI-Rwanda is funded from diverse sources such as foundations, government entities, the private sector, individuals, membership fees, paid services, and other activities. Relying on many sources of income helps TI-Rwanda to maintain its independence. Funding may be unrestricted or tied to specific projects. TI-Rwanda must not risk jeopardizing its reputation for honesty, openness and integrity. Its reputation could be compromised if TI-Rwanda received funding from sources that were perceived to be pursuing activities inconsistent with TI-Rwanda's mission.

2. Purpose of the policy

2.1. This policy is to set forth policies and general guidelines for donations to be accepted by TI-Rwanda and donations to be made on behalf of TI-Rwanda.

3. Scope

3.1. This Policy applies to all fundraising activities, regardless of types of donor or amounts involved, unless otherwise stated in this document. It is to be applied to all new funding from existing donors and to all new donors in the future. It is also applied to all new donations to be made by TI-Rwanda in the future.

3.2. It does not apply to the income raised from the sale of publications, paid services from consultancies or from fees for participation in conferences, events and other activities. Appropriate care to protect the reputation of TI-Rwanda should always be taken.

4. Guidelines

4.1. Guidelines for donations to be accepted by TI-Rwanda

4.1.1. Acceptance of donations by TI-Rwanda as an organization

1. TI-Rwanda accepts funding from any donor and whether monetary or in kind, provided that acceptance does not: impair TI-Rwanda's independence to pursue its mission or endanger its integrity and reputation.
2. TI-Rwanda must take care to ensure that project-related funding does not result in undue influence over TI-Rwanda's programme work. Only funding that maintains TI-Rwanda's independence and reputation will be accepted.
3. TI-Rwanda can receive funding from corporations and donors from the private sector. However, potential donating company must have made a public commitment to ethical standards (such as the UN Global Compact, the Business Principles, etc.), and TI-Rwanda may request that corporate donors sign a commitment to integrity before any donation from that company is accepted.
4. TI-Rwanda should list all donations over 1,500,000 Rwf (over €1,000) and publicly disclose them, including in the Annual Report and on its website.
5. Bank Checks should be made payable to: Transparency International Rwanda, P.O. Box 6252, Kigali-Rwanda.
6. In general, TI-Rwanda welcomes donations that support the pursuit of its mission. Indicators that a donation is acceptable include:
 - ✓ The gift is in response to a written or verbal solicitation by TI-Rwanda.
 - ✓ TI-Rwanda has a use or need for the donation.
 - ✓ The donation and its accompanying terms are legal;
 - ✓ The purpose of the donation is compatible with the mission, purpose, objectives and priorities of TI-Rwanda and the donor does not have a stated purpose contrary to TI-Rwanda's mission, values, objectives and priorities.
 - ✓ The cost required to support/sustain the donation does not diminish the value of the donation to a negligible sum; and
 - ✓ There does not appear to be a physical hazard and/or liability concern associated with the donation.

4.1.2. Donations to the staff and members of TI-Rwanda

1. It is the responsibility of all employees and the members of TI-Rwanda to safeguard the independence and reputation of TI-Rwanda. Therefore, employees and the members should take care to all donations and entertainment they receive from individuals, organisations, business companies, etc. In the context of this policy, entertainment means “invitations to attend events with a social aspect, such as meals & conferences, as well as entertainment events such as shows or games, which are offered free of charge or at reduced rates”.

2. The following should be observed to accept donations and entertainment:

- Donations and entertainment should never be used or allowed to influence business decision making.
- When offers of donations and entertainment are made or accepted in situations where they are not appropriate, they can look like, or may in fact be, bribes. They can expose us to accusations of unfairness or even break the law, and can put at risk our reputation for ethical behaviour.
- Positive, healthy, normal business practices can include accepting and making offers of donations and entertainment, which develop and maintain positive and strong business relationships. We should be able to accept and make offers of donations and entertainment ONLY when they are appropriate, ie when they:
 - are proportionate in the context; and
 - do not create any sense of expectation or obligation on the recipient or the giver.
- The following donations may never be offered or accepted, and will always be deemed inappropriate:
 - Cash of any amount;
 - Any donation (donation) with a value exceeding 20,000 Rwf (or equivalent in foreign currency);
 - Any entertainment worth more than 50,000 Rwf (or equivalent in foreign currency).
 - Any donations or loans from existing suppliers or prospective suppliers while a tender process is underway;
 - Any donations or loans to staff involved in supplier selection decisions (eg Procurement Officer or member of Procurement Committee);
 - Entertainment involving gambling, anything of a sexual nature or exploitation of others.
- It is never allowed to request for a donation or entertainment.
- Donations or entertainment below the limits above are not necessarily appropriate. In some circumstances an element of judgement is required to decide whether a donation is appropriate or not. If any staff or board member is in any doubt, they should consult a

Senior Leadership Team member (or the board chairperson in the case of the Executive Director) and obtain written permission before accepting or offering a donation.

- The following circumstances imply the giving or receiving of a donation or entertainment offer may be appropriate:
 - The giving and receiving of the donation or entertainment strengthens a genuine business relationship;
 - The donation or entertainment does not constitute an attempt to apply undue influence, and does not create an undue obligation;
 - The donation or entertainment is given or accepted in the open rather than in secret;
 - The donation or entertainment is given to celebrate a recognised cultural event such as Christmas or New Year;
 - The donation or entertainment is given to the Transparency International Rwanda or a group of people (department) rather than an individual;
 - The donation or entertainment is branded marketing materials (pens / notebooks etc);
 - The value of the donation or entertainment is not excessive or abnormal in social context;
 - The timing of the donation or entertainment is not suspicious.

- The following circumstances imply the giving or receiving of the donation or entertainment may be inappropriate:
 - The timing, nature or circumstances of the donation means it could be perceived as an attempt to influence a business decision;
 - The value of the donation is excessive in the circumstances (despite being below the limit stated above);
 - The receiver feels obligated, or the giver feels entitled;
 - The donation is given or received in secret.

- If any staff or member is offered an inappropriate donation they should politely decline it and inform their line manager or board chair.
- In the event that declining an inappropriate donation in the moment that it is given might be culturally inappropriate or embarrassing, it should be returned within no less than a week, with appropriate documentary evidence to prove that the donation was returned.
- In the event that an inappropriate donation is received publicly, steps should be taken to restore the reputation of the Transparency International Rwanda, in addition to returning the donation.
- In the event that inappropriate donations are received without consent (such as courier deliveries, bank or mobile money transfers), these should be declared immediately. Steps should be taken to return the donation, or notify authorities if money laundering is suspected.

- Inappropriate donations received by employees and subsequently declared should not be received into the Transparency International Rwanda's funds – rather they should in all cases be returned.
- Appropriate donations, given to the Transparency International Rwanda as a whole, or to a particular team, should normally be enjoyed or shared by all relevant staff members (eg hampers or flowers). Where an appropriate item is not easily sharable, it should be raffled by some random and transparent means.
- All donations will be reported to the supervising officer and recorded on a document managed by the Executive Director and that is available to all staff.

4.1.3. Due diligence before accepting any donation

1. All proposed donations to TI-Rwanda must be brought to the attention of the Executive Director and the Director of Finance prior to acceptance; they will jointly determine whether a donation agreement is required and what due diligence may be necessary.
2. Proposals should set out clearly the purpose of the donation, the source of the donation and whether the intention is for the donation to be restricted or unrestricted.
3. Due diligence will be undertaken by the Executive Director with support from the Director of Finance at the point of proposal/solicitation, as opposed to acceptance. The purpose of due diligence is to evaluate the proposed donation and present an unbiased recommendation, which takes all known facts into consideration. Due diligence should be approached in a transparent manner and should not be influenced by personal judgement.
4. Due diligence will be co-ordinated by the Executive Director, with support as necessary from the Director of Finance and will seek to identify:
 - ✓ The identity of the donor/organization;
 - ✓ The source of funding and the activities in which the donor/organisation engage in;
 - ✓ Any possible conflicts of interest; and
 - ✓ The purpose of the donation.
5. The results of due diligence will be presented to the Senior Leadership Team where a decision on acceptance or refusal of the donation will be made. If a donation is to be refused the Senior Leadership Team will consider all the available due diligence information and make a recommendation to the Board of Directors.

4.1.4. Declination of donations

1. TI-Rwanda has the right to decline any donation that is not consistent with its mission. TI-Rwanda should not accept funds from a particular source that would impair its independence or if there is a significant risk to TI-Rwanda's reputation from public association with the donor. Therefore, donations will not be accepted by TI-Rwanda if:
 - ✓ They compromise TI-Rwanda's integrity or interfere with TI-Rwanda's independence;
 - ✓ As a condition thereof, they require any action on the part of TI-Rwanda which is unacceptable to TI-Rwanda or violates TI-Rwanda policies and regulations;
 - ✓ They create any fund with restrictive clauses that would violate the human rights, or that reserve to the donor or his/her designee the right to designate the recipient;
 - ✓ They violate any Rwandan law;
 - ✓ They require or stipulate the future employment at TI-Rwanda of any specified person or doing business with any specified company or person;
 - ✓ They contain unreasonable conditions;
 - ✓ They are financially unsound or that would expose TI-Rwanda to liability or to diminishment of its reputation; and
 - ✓ Rely on an appraisal or evaluation, provided to the donor by third parties, that is perceived to be inaccurate or unreliable.

4.1.5. Returning declined donations

1. Declined donations must be returned to the donor and a declination statement must be provided to the donor in writing with a copy for the TI-Rwanda's files.
2. Donations that are not returned to their senders or are refused by their senders will be donated to other non-profit organisations and the relevant senders will be informed of the donation.

4.1.6. Donor recognition

1. Donations received by TI-Rwanda will be acknowledged through appropriate venues during the course of each fiscal year. This public recognition is meant to express TI-Rwanda's appreciation and gratitude for the generosity of those individuals and institutions that have committed themselves to supporting the organization's mission.
2. Whenever possible, TI-Rwanda will honor donor's wishes as to how published credit should appear and will honor those who wish to be credited anonymously.

4.2. Guidelines for donations to be made on behalf of TI-Rwanda

1. TI-Rwanda may wish to make donations to other organisations that share the same mission or objectives. TI-Rwanda should always avoid making donations that would impair its independence or if there is a significant risk to TI-Rwanda's reputation from public association with the receiver of the donation. Therefore, the following should be observed while making a donation:

- ✓ Donations to politically exposed persons are prohibited.
- ✓ Donations to legal entities related to government agents are prohibited.
- ✓ Donations in cash must be reviewed pursuant to TI-Rwanda's Constitution and related regulations.
- ✓ Donations must reflect TI-Rwanda's vision, mission and values.
- ✓ TI-Rwanda may make donations to legal entities that are confirmedly non-profit entities and non-governmental organisations.
- ✓ Donations to be made to business companies should be in connection with their work to prevent and combat corruption in their business.
- ✓ The Finance Department and Executive Director will issue an opinion for or against the donation and submit it to the Board of Directors of TI-Rwanda for approval.
- ✓ Donations can only be made once approved by the Board of Directors of TI-Rwanda.
- ✓ The entity that receives a donation must confirm its receipt and inform its purpose and use.
- ✓ TI-Rwanda does not support entities/initiatives that are against its principles and values.
- ✓ The entity receiving the donation is responsible for the transport/collection of the donated assets/materials.
- ✓ Assets must be in good working conditions and may be donated, provided that they do not represent any risk nor cause any harm to the entity receiving the donation.

2. The following materials and equipment that are not in use by TI-Rwanda or are obsolete are deemed available for donation:

- ✓ unserviceable movables;
- ✓ printer cartridges;
- ✓ IT equipment that has been replaced by technologically updated equipment; and
- ✓ other assets/materials/tools deemed unserviceable by TI-Rwanda.
- ✓ The asset will be deemed unserviceable upon express statement of the area responsible for keeping the asset (either regional offices or Headquarters).

3. Donations will always be made directly to entities. All exceptions must be submitted to the Board of Directors for approval.

5. Policy Review.

In order to ensure that this Policy continues to be effective, it shall be reviewed periodically. TI-Rwanda Executive Director is responsible for initiating this review by the Board of Directors at intervals not to exceed five (5) years.

This policy has been reviewed and approved during Transparency International's Board Meeting of February 10th, 2025

Mrs. Ingabire Marie Immaculée
Chairperson, Board of Directors



Mr. Apollinaire Mupiganyi
Executive Director

