

## Overarching Ethical Policy

### 1. Purpose

This policy establishes the ethical framework for the British Red Cross (BRC), guiding our assessment of partnerships, investments, procurements, funding, and other significant activities to ensure a consistent ethical approach across all operations.

### 2. Scope

This policy applies to all: i) our people; and ii) aspects of our work as an organisation, both in the UK and internationally. This includes how we deliver services, form partnerships, procurement choices, accept funding (e.g., grants, donations, legacies, in-kind support, make investments, and manage contractual relationships.

### 3. Policy Statement

We are committed to maintaining robust ethical standards across all our activities, operating with integrity to achieve our mission, maintain our reputation, and foster public trust. Our actions and behaviour affect both the organisation and the people we support. To achieve these standards, we commit to our ethical framework:

#### 3.1. The Fundamental Principles and Charitable Objectives set out in our Royal Charter

- 3.1.1. As a member of the International Red Cross and Red Crescent Movement, we are deeply committed to, and legally bound by, the Fundamental Principles, which guide all that we do.
- 3.1.2. Before engaging in activities with other organisations we consider actual or perceived conflicts of interests that could affect our fundamental principles, charitable purpose or the services we provide to people in crisis.

#### 3.2. Acting with Integrity

- 3.2.1. We are committed to acting with integrity and in line with all guiding principles outlined in our Standing Orders. Upholding integrity reinforces public trust in our mission and affirms our adherence to the Fundamental Principles.

#### 3.3. Core Organisational Values

- 3.3.1. We are guided by four core values (dynamic, compassionate, courageous and inclusive) which shape our daily behaviours and create an environment where we work together to support people in crisis.

### **3.4. Our Strategy**

- 3.4.1. Our actions and decisions are aligned with our Strategy, which provides the foundation for achieving our programmatic and ethical goals.

### **3.5. Human Rights**

- 3.5.1. We take active steps to prevent any forms of exploitation, abuse, or harm to the people we support, and our people. Our Safeguarding Policy and Procedures outline clear reporting processes and mechanisms along with prevention and mitigation strategies.
- 3.5.2. We do not tolerate harassment of any kind nor adverse discrimination and uphold and advance the rights of individuals belonging to the legally recognised characteristics under the Equality Act 2010, and those who may experience discrimination and marginalisation outside the Act's scope; this in line with our Equity, Diversity, and Inclusion Policy.
- 3.5.3. We support the objectives of the Modern Slavery Act 2015, publish an annual slavery and human trafficking statement, and require our partners to comply fully with their responsibilities under this legislation.

### **3.6. A Supportive and Safe Working Environment**

- 3.6.1. We pay our people appropriately, ensuring a fair, consistent and transparent system of reward, in line with our Salary Procedure.
- 3.6.2. We protect and promote health and disease prevention.
- 3.6.3. We safeguard the health, safety and welfare of our people at work and uphold our responsibilities to members of the public and contractors, according to our Health and Safety Policy.
- 3.6.4. We create a work environment where all individuals are treated with dignity, respect, fairness and is free from discrimination, harassment, and victimisation, as per our Dignity at Work Policy.

### **3.7. Data Ethics**

- 3.7.1. We collect, use, and share data responsibly, ensuring informed consent, robust security, and fairness across all our operations to prevent harm and mitigate biases. Aligned with UK General Data Protection Regulation, the Data Protection Act 2018, and our Information Governance Policies, we address ethical considerations for policies, systems, procedures, processes, services and projects.

### **3.8. Technology Use**

**3.8.1.** We leverage technology, including Generative Artificial Intelligence (AI), to advance our humanitarian mission. We ensure that these technologies promote transparency, fairness, and accountability, while protecting the rights, dignity, and privacy of individuals.

### **3.9. Climate Change**

**3.9.1.** We respond to climate change, reducing our environmental footprint, and enhancing environmental sustainability in line with our Environmental Sustainability Policy.

### **3.10. Fraud, Bribery, Corruption and Sanctions**

**3.10.1.** We have a zero-tolerance approach towards fraud, bribery, corruption, money laundering, and the financing of terrorism. In line with our Fraud, Bribery, and Corruption Policy we act to prevent or deter these activities strictly adhering to Counter-Terrorism and Sanctions Laws and Regulations.

### **3.11. Fundraising**

**3.11.1.** We seek to ensure that our fundraising activities comply with charity law and relevant regulatory frameworks. Our due diligence processes set out a clear ethical framework for engaging in partnerships and accepting donations, ensuring that fundraising activities align with our mission and values.

### **3.12. Procurement**

**3.12.1.** In line with our Procurement Policy, we embed value for money as a core principle in our procurement decisions, while ensuring fairness, sustainability, and preventing favouritism and corruption. In an emergency where the humanitarian imperative is paramount, and speed of deployment is essential to save lives, necessary goods and services will be purchased from the source most conducive to achieving these objectives.

### **3.13. Investment**

**3.13.1.** We will not directly or indirectly invest shares in, or commercial paper issued by, companies which compromise our Fundamental Principles, objectives, and ethical standards set out in this policy and our Investment Policy.

### **3.14. Considerations for Accepting and Declining Opportunities**

**3.14.1.** We have a duty not to decline opportunities or funding which aid achievement of our objectives, without good reason, the exception being if there are legal, regulatory or ethical

considerations. We will return donations in instances where after accepting we discover that keeping them conflicts with this policy. The decision-making process regarding the acceptance or refusal of donations is set out in the Acceptance, Refusal and Return of Donations Procedure.

### 3.15. High-risk Industries

3.15.1. We give special attention to the following industries given their potential to compromise our Fundamental Principles. Other risk areas are reviewed on a case-by-case basis, in accordance with relevant statutory texts and guidance.

- i. **Arms and Ammunitions:** The Movement's mandate includes ensuring humanitarian protection and assistance for victims of armed conflict and internal strife. Therefore, we would not enter into any partnership or agreement with, or accept funds from, any organisation or individual where we are reasonably aware that their core business is the manufacture or sale of arms and ammunition, or where their public profile is associated with these activities. The maximum threshold we would permit is 10 per cent of their core business, but we reserve the right to refuse opportunities below this threshold in particular circumstances.
- ii. **Tobacco:** We would not enter into any partnership or agreement with, or accept funds from, any organisation or individual where we are reasonably aware that 10 per cent or more of their core business is the manufacture or sale of tobacco, or tobacco-related products, or where their public profile is associated with these activities. We reserve the right to refuse opportunities below this threshold in particular circumstances.
- iii. **Fossil fuels and Environment Harm:** We would not normally enter into any partnership or agreement with, or accept funds from, any organisation or individual where we are reasonably aware that 10 per cent or more of their core business involves the extraction of fossil fuels (oil, coal or gas) or other activities that are harmful to the environment, in line with our Environmental Sustainability Policy, or where their public profile is associated with these activities. However, we retain the discretion to assess opportunities on a case-by-case basis.
- iv. **Alcohol and alcohol-related business:** Alcohol is specifically mentioned within the Emblem Regulations as an area requiring special care, as many National Societies offer

services that focus upon health and social issues related to alcohol abuse. While we are able to accept support in the form of donation or gifts in kind, the BRC is not able to enter into a 'public association' with such companies. The BRC name and the red cross emblem must not be linked with the names or logos of alcohol-related products or companies.

### **3.16. Ex Gratia Payments**

**3.16.1.** In exceptional circumstances, adhering to regulatory requirements, ex gratia payments will be made if there is a moral obligation to do so. If the relevant threshold is met, the Charity Commission consent will be sought prior to a payment being made.

### **3.17. Lessons Learned from Policy Evaluation**

A review of this policy was undertaken with comprehensive consultation involving International Humanitarian Law, Fundraising, Quality and Standards, Information Governance, Procurement and Finance. Changes include Policy and Procedure Framework compliance, content updated including to meet current sector best practice, clarification of provisions, and organisational positions and practice.

## **4. Responsibilities**

The Board of Trustees is ultimately accountable for this policy.

The Chief Executive (Policy Owner) is the Executive Leadership Team member responsible for this policy on behalf of the Board, ensuring that the organisation achieves external and internal standards set out in this policy.

The Executive Leadership Team (ELT) are responsible for implementation of, and compliance with this policy in Directorates and teams, ensuring that the ethical standards within this policy are embedded in relevant decision-making procedures and processes in their Directorates.

The Regulatory Reporting Manager together with the Policy Owner, is responsible for the development, implementation, communication, monitoring, and review of this policy.

All our people are responsible for adherence to this policy.

## 5. Governance

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| <b>Associated policy document/s</b>                       | <ul style="list-style-type: none"> <li>• Code of Conduct</li> <li>• Conflict of Interests, Gifts, and Hospitalities Policy</li> <li>• Dialogue Fundraising Policy</li> <li>• Environmental Sustainability Policy</li> <li>• Health and Safety Policy Parts 1, 2 and 3</li> <li>• Investment Policy</li> <li>• Procurement Policy</li> <li>• Fraud, Bribery and Corruption Policy</li> <li>• Raising a Concern Policy</li> <li>• Volunteer Complaints, Issues and Concerns Policy</li> <li>• Information Governance Policy</li> <li>• Data Protection Policy</li> <li>• Incident Reporting Policy</li> <li>• Safeguarding Policy</li> <li>• Equity, Diversity and Inclusion Policy</li> <li>• Use of Generative Artificial Intelligence Policy</li> </ul> |
| <b>Policy(ies) superseded</b>                             | N/A  |
| <b>Legislation/ regulatory requirements and standards</b> | <ul style="list-style-type: none"> <li>• Modern Slavery Act 2015</li> <li>• Equality Act 2010</li> <li>• Bribery Act 2010</li> <li>• Code of Fundraising Practice</li> <li>• Charity Fundraising: A Guide to Trustee Duties 2016</li> <li>• Mental Capacity Act 2005</li> <li>• Counter-Terrorism and Sanctions Laws and Regulations</li> </ul>  |
| <b>Equality impact assessment</b>                         | No equality impact identified  |
| <b>Data Protection impact assessment</b>                  | No data protection impact identified   |
| <b>Environmental impact assessment</b>                    | No environmental impact identified   |
| <b>Endorsing Authority; Endorsement date</b>              | ELT; March 2025  |
| <b>Approval Authority; Approval date</b>                  | BoT, April 2025  |
| <b>Policy Owner</b>                                       | Chief Executive  |
| <b>Policy Lead</b>  | Regulatory Reporting Manager   |
| <b>Date effective</b>                                     | April 2025   |
| <b>Interim update date</b>                                | N/A  |
| <b>Review date</b>  | April 2028   |
| <b>Version</b>  | 3.0  |
| <b>Keywords</b>   | ethics, integrity, moral, trust, transparency, human rights, safeguarding, sustainability,   |

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|-------------------------|--|---|
|                         | fundamental principles, reputation, conduct, standards, decision-making, compliance, best practice, purchasing, fundraising, investing, risk, GDPR, information governance, grants, donations, legacies, in-kind support, health and safety, AI, equity, diversity, inclusion, discrimination, modern slavery, dignity, industries, climate, procurement, environment, tobacco, alcohol, fossil fuel, arms, ammunition, charity commission |   |
| <b>Revision history</b> | <b>Version</b>   | <b>Summary of change (s)</b>  |
|                         | 1.0  | New Policy  |
|                         | 1.1  | Amendment to section 5.1 to confirm approval of ex gratia payments is reflected in Decision Making Matrix.  |
|                         | 1.2  | Minor edits to content.   |
|                         | 2.0  | Included the Green Policy; removed details in Section 4 re: arms and ammunition, tobacco and alcohol, which are already addressed by other policies and procedures; minor updates and tweaks; included a navigation pane; full review to ensure it remains fit for purpose. |
|                         | 2.1  | Included back details on special categories under Section 4, added a new special category (fossil fuels) to align with the Green policy; minor tweaks in the text.  |
|                         | 2.2  | Included content relating to accepting and refusing donations under Section 4; changed review date from Jan/24 to July/24 due to the ongoing ethical fundraising workstream.  |
|                         | 3.0  | Scheduled review: compliance with the new Policy and Procedure Framework; material changes, including adding AI and Data Protection commitments.  |

## Appendix: Definitions

**Adverse Discrimination:** Any form of discrimination that has a negative impact on individuals or groups with protected characteristics. The Fundamental Principles permit us to discriminate in the provision of our services on the basis of need.

**Conditional donation:** Any donation which was given with any form of conditions attached which we must meet in order to keep and use the donation. For example, an agreement that the supporter will visit the project they have funded, or a donation to provide aid to a specific disaster.

**Ethical Standards:** Refers to the set of principles, rules and guidelines essential for upholding our organisation's integrity.

**Ex Gratia Payments:** A monetary payment, transfer of property, or waiver of rights to money/property that cannot be justified as being in the interests of the charity, but which the charity trustees believe that they are under a moral obligation to make. This often arises in situations like when gifts are left to the BRC in a will.

**Fundamental Principles:** The seven principles that guide the actions and operations of the Movement: Humanity, Impartiality, Neutrality, Independence, Voluntary service, Unity and Universality.

**Generative AI:** Technology that can create content, such as text, images, and sounds, by learning from large amounts of data. Typical examples of Generative AI tools are ChatGPT from OpenAI, Gemini from Google and Copilot from Microsoft.

**Movement or International Red Cross and Red Crescent Movement:** The international humanitarian network composed of the International Committee of the Red Cross (ICRC), the International Federation of Red Cross and Red Crescent Societies (IFRC), and the National Red Cross and Red Crescent Societies.

**Our People:** All BRC staff, volunteers, including office holders, consultants, contractors, and third-party organisations contracted to work on behalf of the BRC in the UK and internationally.

**Products (or activities) harmful to the environment:** Products and activities that contribute to environmental degradation by depleting natural resources, generating pollution or introducing hazardous substances into ecosystems. These can include those associated with extractive industries (such as deforestation), large-scale agriculture, transportation (automotive, aviation, shipping), fast fashion, non-biodegradable and persistent pollutants (e.g., plastics), and manufacturing processes involving toxic or hazardous substances (e.g., pesticides, heavy metals).

**Royal Charter:** BRC's primary governing document setting out our charitable purpose; and the powers, rules, and other legal responsibilities.

**Standing Orders:** Alongside the Royal Charter, the Standing Orders outlines our internal governance rules and arrangements.