OPEN SUPPLY HUB

RESPONSIBLE FUNDRAISING POLICY

Approved July 2024 by the Board of Directors - to be reviewed July 2026

INTRODUCTION: Open Supply Hub is a non-profit powering the transition to safe and sustainable production with the world's most complete, open and accessible global supply chain map. It shows where global production locations are and who is connected to them and makes that data easy for anyone to work with. In doing so, OS Hub is opening doors to new solutions, targeted investment, and more effective collaborations. We are a 501(c)(3) non-profit organization registered in the United States, with a business model of generating philanthropic funds and program service revenue to cover the costs associated with pursuing our mission.

At the point of developing this policy, our philanthropic funding comes from charitable contributions, corporate philanthropy, government grants and individual donations. Our program service revenue comes from sales revenue, speaker fees, and other services at a sliding scale rate. We also receive support from in-kind contributions¹. This policy only focuses on our philanthropic income stream (fundraised monies). It is important to us that a proportion of our income will always derive from philanthropic funds, so as to maintain our neutral status.

PURPOSE OF THIS POLICY: To ensure our pursuit of philanthropic funds is undertaken responsibly and in line with our organization's values. In determining what responsible fundraising looks like for OS Hub, this policy includes: (1) the three principles upon which this policy has been built, (2) our commitment to responsible fundraising practices including the sources of funding we will and will not accept, (3) the ways in which we are open about who funds the OS Hub platform, and (4) details on implementing this policy.

1. PRINCIPLES OF THIS POLICY

This policy has been built on a foundation of three principles.

Principle 1: Open Supply Hub operates in line with its values and these values will inform this policy. The four values that guide how OS Hub works are:

- **Collaborative:** We accompany our stakeholders and place them at the heart of everything we are working on; every voice has equal importance and should be represented.
- Open: We were founded on and are committed to the principles of openness: open-licensed data, open dialogue, open innovation and open collaboration.
- **Determined:** We are determined to deliver on a singular mission with speed, simplicity and expertise to make supply chain data open, accessible and trusted for the public benefit.
- **Equitable:** We pursue and nurture equity in our work and our team, valuing balance and respect in all aspects of our operations.

¹ We have intentionally excluded in-kind support in this policy, as at the point of developing it, any in-kind support we receive is more closely aligned to procurement - e.g.: receiving pro bono legal support. When this policy is next revisited, we will review whether in-kind services are more closely aligned to fundraising, and therefore whether to bring them into this policy.

Principle 2: Open Supply Hub engages with any and all stakeholders across the supply chain ecosystem. Our remit is to open up data about global supply chains, so that stakeholders can collaborate to drive positive social and environmental change and remediate abuses. We exist to share data linked to both the most and the least responsible companies in the world (and all companies in between), because only when all supply chain data is open and used to enable collaboration will we see true change.

Principle 3: Accepting data and accepting funding are two separate things. We will accept data from any organization, no matter what human rights record they have, or the potential consequences of what can be done with the products they sell. OS Hub is working to plot global production locations in order to collectively address challenges and drive progress for human rights and the environment, and must therefore strive for the most comprehensive coverage possible. Accepting data from an organization does not indicate an endorsement of their work, nor does it mean that we would necessarily accept funding from that organization.

2. OUR COMMITMENT TO RESPONSIBLE FUNDRAISING PRACTICES

OS Hub is subject to a variety of laws and regulations at the federal, state, and local level in the United States². Our fundraising will always be conducted in compliance with applicable laws and regulations, and we will never engage in aggressive or coercive fundraising practices. Our organizational values, in particular working openly and collaboratively, quide how the Business Development team works.

This section covers two scenarios to ensure our fundraising practices are responsible: sources of funding we will <u>not</u> accept, and the process to follow to determine if funding should be declined. Anything not outlined in these two scenarios, means we will accept funding from those sources.

2.1. Sources of funding we will not accept:

OS Hub is committed to fundraising in a way that is responsible. To ensure this, we have a short but definitive list of places we will actively decline monies from. These are institutions that:

- Develop products that have the sole end result of harm: arms/weapons, gambling, and tobacco.
- Are defined as terrorist organizations as per the US State Department list of <u>Designated Foreign Terrorist</u> <u>Organizations</u>
- Are governments we cannot legally work with on the basis of sanctions (as per the <u>US State Department list of countries of particular concern</u>) and anti-money laundering laws (as per the <u>Financial Crimes Enforcement Network</u>).
- Have a conflict of interest with OS Hub

We will also decline (or return) donations from institutions that are perceived to be using a donation to OS Hub as a

² E.g.: IRS compliance, donor acknowledgment, quid pro quo contributions (Federal), and charitable solicitation registration and subsequent renewals (State). This list is not exhaustive and is purely indicative of the kind of laws and regulations in place.

form of greenwashing or social washing³, or in return for undue influence⁴. Both of these may be hard to spot initially. If there is an internal concern that a donation of this kind has been made (or is in the process of being made), the Business Development Director and Executive Director will alert the Fundraising Committee and Chair of the Board of Directors, to discuss next steps and any required remedial action. If an external stakeholder perceives that a donation of this kind has been made, they should alert the OS Hub team using the All Voices reporting line: https://opensupplyhub.allvoices.co/

2.2. Process by which we will determine if funding should be declined

There will at times be funds that create uncertainty and disagreement across the organization about whether they should be accepted or not. These include (but won't be limited to) when funds are:

- From a specific company type, or sector, that is novel or contentious. Examples include those producing potentially harmful products such as alcohol and pharmaceuticals, or that extract fossil fuels. The nuance of these sectors is complex, not least as one parent company could own numerous businesses producing everything from plastic equipment to missiles. Another example would be a tech company including generative AI solution providers who may use the data hosted on OS Hub's platform in ways that are at odds with our values.
- From a high-net worth individual who would expose OS Hub to reputational risk
- Going to radically affect the scope and/or scale of OS Hub and would be linked to the core existence of the organization (e.g.: core operational support of a scale that means we're dependent and exposed to influence)

These funding opportunities will be reviewed on a case by case basis using the following process:

- Leadership Team Go/NoGo discussion in which the pros, cons and risks are outlined
- Summary of the discussion is shared with the Fundraising Committee for comment and input
- The Executive Director sends a summary of the discussion with the Fundraising Committee along with the recommendation arrived at, to the whole Board of Directors for their discussion and feedback.

There is a risk that an opportunity is escalated and ultimately never materializes. This full process will therefore only be mobilized at the point of drafting a proposal.

3. BEING OPEN ABOUT OUR FUNDERS

We are committed to being open, as per our values, about who we receive funding from. Open Supply Hub clearly lists our current philanthropic funders on the supporters page on our website.

³ Greenwashing & social washing is, simply put, when a company talks the talk without walking the walk. For OS Hub, this could look like: heavily promoting that they fund OS Hub including talking about transparency, without disclosing any data about supply chains (either on OS Hub or elsewhere); making a large donation off of the back of bad social or environmental PR with no tangible plans to change anything in their supply chain.

⁴ Some funders sit on OS Hub's Board of Directors. These specific Board seats, as with all others, have been earned by these Directors through a rigorous nomination process in accordance with our <u>Bylaws</u>. The Board seat is held by the individual, not the organization, based on the expertise they can add to the strategic development of OS Hub. Additionally OS Hub has a Technical Steering Committee which organizations pay committee dues to be part of. The Committee is invitation only, and exists to guide and steer our technical roadmap based on insights and use cases, but OS Hub is not committed to needing to adhere to this advice. Any guidance will be by committee (not one individual or organization) and the committee is made up of both paying and non-paying organizations all with equal voice, say and power.

3.1. Donor Privacy and Data Protection

OS Hub takes donor privacy and data protection seriously.

Collection of donor information: We collect the name of the funding organization/individual, names of our points of contact, contact details, donation amounts, and a record of our interactions. Donors opt in to receive communications from us.

Use of Donor Information: We collect information about donors so that we can communicate effectively with them. We communicate about the processing of their donation, communicating on the impact of their donation and implementation of activities stipulated in our grant agreement, inviting them to events or webinars, organizing formal and informal catch-ups, and reporting to regulatory authorities. We do not share donor details unless we have received their consent to do so.

Data Sharing and Disclosure: Details about donors are secured in the platforms that OS Hub uses for CRM and project management. These are accessible only by OS Hub team members and log in is protected by two-factor authentication.

Legal Obligations: Donor information may be disclosed to comply with legal requirements or to protect the organization's legal rights.

Donor Rights - Access and Correction: Donors' have the right to access their personal information and request corrections if needed.

Opt-Out: Donors can request to opt-out of communications or data sharing by emailing or speaking to their point of contact at OS Hub. This will be marked on their record and the team notified.

Anonymity: Donors have the option to remain anonymous, should they prefer. The OS Hub point of contact should be notified of this at the time of making the donation, and it will be marked as such in our accounts. Requirements around Legal Obligations and Third-Party Sharing as per section 3.1, may supersede a donor's request to remain anonymous.

Third-Party Sharing: At times, OS Hub needs to share donor information with third parties to facilitate essential operational and compliance functions (e.g.: auditors, financial institutions, payment processors, and other funders completing due diligence on OS Hub). When sharing such information, it will always be with the donor's consent, and information will be shared in line with our data protection processes.

Document Management: We have a Document Retention and Destruction Policy which we will adhere to for document management pertaining to donors.

4. IMPLEMENTING THIS POLICY & ACCOUNTABILITY

The implementation of and adherence to this policy is the responsibility of the Business Development Director, with the Executive Director ultimately accountable. This policy is openly shared on OS Hub's website for accountability. If anyone suspects that OS Hub is in violation of this policy, we invite them to submit their concerns through the All Voices Reporting Line: https://opensupplyhub.allvoices.co/

5. CONCLUSION

This policy serves as a guiding document for our organization, and we commit to reviewing it every two years, or as requested by the Board of Directors and/or Leadership Team (whichever comes first) to ensure that it remains fit for purpose, and aligns with our organizational mission, vision and values. We are thankful to all of our supporters who believe in opening up supply chain data for the public benefit, and welcome their contribution towards making Open Supply Hub an accessible public good. For further information about Open Supply Hub and our financials, please visit: https://info.opensupplyhub.org/financials