

# Center for Global Development (CGD) and CGD Europe (CGDE) Policy on Funding Independence, Integrity, and Transparency January 2023

### 1. Introduction

- 1.1 The Center for Global Development (CGD) is a 501(c)(3) organization (tax identification number 52-2351337). CGD Europe (CGDE) is a charitable company limited by guarantee (registered charity number 1157318), registered in England and Wales, and governed by Articles of Association. CGD established CGDE and is the sole company law member of CGDE. CGD and CGDE (CGD/E) are separate independent legal and financial entities, although they hold closely aligned objectives and collaborate on joint projects and initiatives where in both organizations' interests.
- 1.2 CGD/E is deeply committed to the principles of independence, transparency, and accountability, both as a means to foster better development outcomes and to maintain the integrity of our work, and have received the highest-possible ratings from <a href="Guidestar">Guidestar</a>, <a href="Transparify">Transparify</a>, and <a href="Charity">Charity</a>
  <a href="Navigator">Navigator</a> over the past 4 years in recognition of this commitment.

# 2. Purpose

2.1 This policy complements CGD and CGD Europe (CGD/E) Funding Acceptance and Research Independence policies and serves to provide additional clarity and guidance on the independence, and integrity of the institution's funding.

#### 3. Audience

3.1 This policy applies to all funding acquired by CGD/E employees, board directors, trustees, agents, and other intermediaries when acting on CGD's behalf.

## 4. Policy

*Independence and Integrity* 

- 4.1 As mentioned above, CGD is a 501(c)(3) organization (tax identification number 52-2351337) and CGD Europe (CGDE) is a charitable company limited by guarantee (registered charity number 1157318), registered in England and Wales, and governed by Articles of Association.
- 4.2 CGD and CGD Europe are independent and nonpartisan and in the case of all funding provided to CGD/E, CGD/E retains total discretion and accountability regarding the use of said funds, subject only to our commitment to use said funds for the programs or projects detailed in funding proposals.
- 4.3 There are no conditions or limitations on CGD/E's independence in research, findings, conclusions, or resulting publications. CGD/E does not accept funding that seeks to impose limits or restrictions on our independence in research, findings, conclusions or resulting publications (see CGD's Research Independence Policy).
- 4.4 CGD/E's Organizational Policies and Terms on the independence of its work (see links below) are to be included in all funding concept notes and proposals.



- CGD Independence Statement
- CGDE Independence Statement
- 4.5 CGD/E actively seeks support from a diverse group of funders around the globe, including charitable foundations, government agencies and private firms and individuals, to ensure that no single person, entity, or industry can exercise undue or inappropriate influence over the research or recommendations produced by our scholars. Feedback from all policy audiences, including funders, is always welcome, but researchers are not obliged to respond to nor to incorporate any aspect of that feedback.
- 4.6 All potential sources and terms of support undergo a thorough internal and when necessary, Board committee review to ensure that CGD/E can maintain its absolute commitment to scholarly independence and full compliance with all applicable laws and regulations regarding lobbying, foreign agency, and disclosure.
- 4.7 CGD/E seeks <u>funding</u> in the form of general operating support as a first priority and accepts funding earmarked for specific programs and workstreams only in compliance with CGD's Organizational Policies and Terms.
- 4.8 CGD/E does not accept funding from governments, individuals, organizations, and/or countries subject to US/UK/UN sanctions. In addition, CGD/E does not accept funding from foreign governments to support our work examining US development policy (e.g., publications, events, meetings, etc.).
- 4.9 CGD/E ensures that no <u>FARA</u>-registrable activity is undertaken. CGD does not function directly or indirectly as a donor's representative or agent to the public at large, and in carrying out research activities, CGD and its employees and agents do not act as agents of any foreign principal. Further, CGD does not undertake activities on behalf of any donor that constitute "political activities" under FARA (see annex 1 for detailed language).
- 4.10 CGD closely follows federal tax rules prohibiting political activity by charitable organizations. All work by CGD Europe seeks to advance knowledge and understanding and educate for public benefit in accordance with English and Welsh charity law, HM Revenue and Customs tax law, and CGDE's charitable purposes. CGD interactions with policymakers are informative, educational, and non-partisan in nature, and staff share only publicly accessible information that is freely available on CGD's website. CGD does not ask policymakers to sign, pledge, or otherwise endorse a specific policy goal and aims to be balanced in its outreach, providing educational materials to any policymaker upon request.
- 4.11 CGD/E is highly selective in its choice of funders and partners, and we organize regular trainings with staff to ensure compliance with the principles outlined in this policy and annual disclosure of non-CGD activities.

### *Transparency*

4.12 CGD/E makes public all of its most recent fiscal year <u>funding</u> and <u>financial statements</u>, including active and historic lists of funding agreements totaling US\$30,000 or more per year.



- 4.13 CGD is recognized for its funding transparency by both the <u>Quincy Institute for Responsible Statecraft</u> and the <u>Center for International Policy</u>.
- 4.14 All funding sources are known to CGD/E. CGD/E publicly acknowledges funding for our work as anonymous only at the request of the funder. Expenditure of the funding is made independently by our organization and in compliance with CGD's Organizational Policies and Terms, and the Research Independence and Funding Acceptance Policies.