

Center for Media Integrity of the Americas, Inc.

Ethical Funding Policy

This Ethical Funding Policy (the “Policy”) is adopted to ensure that the Center for Media Integrity of the Americas, Inc. (the “Center” or “CMIA”) properly manages its priorities and projects with appropriate independence from its funders. This Policy also aims at providing transparency regarding the identity of the CMIA’s sources of funding to avoid any suspicion of inappropriate influence or conflicts of interest concerning the CMIA’s activities.

The CMIA shall apply the policies and considerations set forth in this Policy prospectively as of January 2023 to all types and amounts of funding from all sources, irrespective of whether the Center has made decisions to accept funding in the past inconsistent with the policies and principles set forth in this Policy.

ARTICLE 1 Introduction

1.1 Definitions

1.1.1 “Board” shall mean the Board of Directors.

1.1.2 “Funder” shall mean any person or entity that provides funding, in any amount or form, to the CMIA.

1.1.3 “Funding” shall mean all financial support, but also may take the form of a “in-kind” service rendered by a funder or partner under the terms of a Memorandum of Understanding. Funding will only consist of voluntary, unilateral support to the Center without a quid pro quo for any support, service rendered by, or resources provided to the CMIA.

1.1.4 “The Center or CMIA” shall mean The Center for Media Integrity of the Americas, acting through an authorized officer, employee, or other representative.

1.1.5 “Policy” shall mean this Ethical Funding Policy, adopted by the Board of Directors on *[date of adoption]*, together with any amendments and additions to this policy.

1.1.6 “Reviewer” shall mean the entity, group or individual responsible for performing the in-depth review of proposals for funding in line with the criteria and principles set forth in this Policy, including mandatory review of funding of \$10,000 or more, e.g., committee of the Board.

1.2 Principles and Mission Statement

1.2.1 *[Include organization specific principles and mission statements here].*

ARTICLE 2 Funds Acceptance: General Conditions

2.1 The CMIA shall advise its Board of Directors of all donations of \$10,000 or more, so that Board may determine whether the donation should be accepted. The Board shall review the donation for compliance with, among other things, the terms and conditions of this Policy, the non-discrimination and non-harassment guidelines of the Center, and any other potential conflict of interest or appearance of a conflict of interest that may be attendant to a particular donating organization.

2.2 Donations valued at less than \$10,000 need not be subject to scrutiny by the Board of Directors indicated in Section 2.1 above. However, acceptance of all donations will nevertheless be subject to the conditions set forth in this Policy.

2.3 Subject to the requirements set forth in this Policy, the Center will have broad discretion in determining which donations to accept and which donations to reject; the CMIA may choose to make available information relating to the rejection of any donation, in accordance with the transparency provisions set forth in this Policy.

2.4 The CMIA shall consider the procedural aspects of the funder's funding process and assess such process against standards of transparency and freedom of information that the CMIA deems appropriate.

2.5 In addition to the specific considerations based on funder type in this Policy, the CMIA will also take into account the following general considerations for all types of funders:

2.5.1 The Center has ascertained that the funding will not threaten or cause inappropriate influence over the CMIA's programs (i.e., the funder agrees to respect the Center's principles, policies, projects, strategic choices, and expertise and takes account of the Center's size and monitoring capacity in order not to request excessive reporting).

2.5.2 The Center has ascertained that (i) no conflicts of interest exist with potential projects of the funder by completing an analysis in connection with its existing conflict of interest policy and (ii) any affiliation of the CMIA with the funder will not compromise the integrity of the Center. In deciding whether to accept funding, the CMIA will consider the extent to which the funder is funding grantees or organizations that may be working against transparency and ethical journalism.

2.5.3 The CMIA has ascertained that there is no significant risk that public association with the funder will negatively impact the CMIA's reputation, and that acceptance of the funding would not be perceived to be inappropriate or unethical by the Center's advisors, partners, and other constituencies relevant to the mission and affected by the work of the Center.

2.5.4 The Center has determined with reasonable confidence the funder's source of funding to ensure compliance with United States money laundering laws.

2.6 The Center has confirmed that the type of costs or activities to be funded by funder are consistent with the CMIA's policies and procedures and eligible use(s) for the funding. *No government funding shall be accepted*, however, funding from international intergovernmental organizations that support democratic governance, human rights, the rule of law and core democratic values, such as the freedom of expression and press freedom shall be accepted.

ARTICLE 3 Funds Acceptance: Funder-Specific Conditions

Foundation Funders

3.1 The CMIA will accept funding from private foundations only when the following criteria are met:

3.1.1 The CMIA has ascertained with reasonable confidence the source of the funds of the funder;

3.1.2 The CMIA has determined that the sector in which the funder operates is appropriate affiliations and involvements for the Center;

3.1.3 The CMIA has reviewed the history of the foundation, including publicly available information regarding previous grants and funding from the foundation, and based on this information has determined that the Center has no reason not to be affiliated with the funder and its previous grantees;

3.1.4 The CMIA has ascertained that any specific philosophical or programmatic agenda or other interest of the funder aligns with the interests of the Center, its current projects, and strategic choices;

3.1.5 The CMIA has evaluated the public perception of the funder and the history of reporting on the funder's activities, and based on this evaluation has determined that accepting the funding from the funder would be in the best interest of the Center;

3.1.6 The CMIA has determined that the affiliation of the funder with any institutional backer, if any, would not negatively affect the Center through its association with the funder; and

3.1.7 The CMIA has ascertained that no significant risk exists that public association with the funder could impair the reputation or credibility of the Center.

3.1.8 The CMIA will accept funding from foundation funders to fund its staff salaries, conferences, training seminars and awards programs, website and tech support, and all expenses associated with these activities

Corporate Funders

3.2 The CMIA will accept funding from corporate funders only when the following criteria are met:

3.2.1 The CMIA determined that the agreements between the funder and the Center clearly distinguish between funding, advertisement, and sponsorship of the funder;

3.2.2 The CMIA has determined that the funder has not participated in deceptive advertising or promotional practices such as greenwashing, which is defined for this policy as disinformation disseminated by an organization so as to present an environmentally responsible public image, rightswashing, which is defined for this policy as attempting to falsely present a human rights-friendly public image, or whitewashing, which is defined for this policy as deliberately attempting to conceal unpleasant facts about an organization;

3.2.3 The CMIA has determined that the funder's public image, based on publicly available information, will not negatively affect the Center by association. The Center will not accept donations from any funder whose activities or business practices are unlawful or unethical or may cause harm to the principles, goals, or activities of the CMIA;

3.2.4 The CMIA will not accept funding or support from any funder whose activities or business practices are incompatible with the work of the Center, do not interfere with, or are inconsistent with the CMIA's policies and principles; and

3.2.5 The CMIA will accept funding from corporate funders to fund its staff salaries, conferences, training seminars and awards programs, website and tech support, and all expenses associated with these activities.

Religious Institution Funders

3.3 The CMIA will not accept funding from religion-affiliated funders.

Government Funders

3.4 The CMIA will not accept funding from Government funders.

Individual/Family Office Donations

3.5 The CMIA will accept funding from individual and/or Family Office funders only when the following criteria are met:

3.5.1 The CMIA has ascertained that the risk of influence by the funder is negligible to the Center and will not interfere with the mission, vision, or principles of the CMIA;

3.5.2 The CMIA has determined that the funding does not risk violating its policies relating to unwanted donations set forth in Article 2 and Article 5;

3.5.3 The CMIA has determined that it has the capability of complying with any privacy concerns of the funder, including maintaining the anonymity of the funder, the donation amount or the stated purpose of the funding, if required; and

3.5.4 The CMIA has determined based on appropriate diligence that there are no money laundering and other corruption-related concerns with the funder.

3.5.5 The CMIA will accept funding from individual funders to fund its staff salaries, conferences, training seminars and awards programs, website and tech support, and all expenses associated with these activities.

Public Collection Donations

3.6 The CMIA will accept funding collected from the general public only when the following criteria are met:

3.6.1 The CMIA has ascertained that the practices used to collect the funds comply with ethical standards acceptable to the Center. The CMIA will examine multiple factors in determining whether the collection methods are acceptable, including:

- (a) Collectors do not solicit from residential properties.
- (b) Collectors do not use aggressive collection methods;
- (c) Collectors do not use misleading arguments to encourage people to donate funds; and
- (d) Collectors respect people's decisions not to donate.

3.6.2 The CMIA has determined that the funder documents its collection methods accurately, objectively and verifiably. The Center has determined that it will only participate in donation-based crowdfunding where donors give based on charitable motives, not for rewards or other gain.

3.6.3 The CMIA will accept funding from individual funders to fund its staff salaries, conferences, training seminars and awards programs, website and tech support, and all expenses associated with these activities.

Academic Institution Funding

3.7 The CMIA will accept funding where the funds have been collected from academic institutions only when the following criteria are met:

- (a) The institution will not attempt to influence inappropriately the Center;
- (b) The institution keeps diligent records of its donations and the purposes for which funds are used by other grantees; and
- (c) The CMIA has ascertained that the institution has abided by all applicable laws and regulations relating to donations.

3.7.1 The CMIA will accept funding from academic institution funders to fund its staff salaries, conferences, training seminars and awards programs, website and tech support, and all expenses associated with these activities.

Anonymous Funding

3.8 The CMIA will not accept funding from anonymous funders.

Crowdfunding

3.9 In the case of crowdfunding, the CMIA will comply with the following additional considerations:

3.9.1 The CMIA has determined that the reputation of the crowdfunding platform used is acceptable to the Center and complies with the values set forth in this Policy;

3.9.2 The participants of the crowdfunding platform are acceptable to the CMIA and the CMIA has documented to a level it deems satisfactory the identity of the individual participants in the crowdfunding;

3.9.3 The CMIA has determined that the crowdfunding platform maintains compliance checks and standards satisfactory to the CMIA to ensure compliance of the participants in the crowd-sourcing platform with any relevant anti-money laundering legislation; and

3.9.4 The CMIA shall obtain prior approval from the Board before accepting any funding from crowdfunding.

3.9.5 The CMIA will accept funding from academic institution funders to fund its staff salaries, conferences, training seminars and awards programs, website and tech support, and all expenses associated with these activities.

ARTICLE 4 Funds Acceptance: Type of Funding Considerations

4.1 There are generally two types of funding: restricted and unrestricted funding. Restricted funding consists of grants or donations that require that the funds be used in a specific way or for a specific purpose. The CMIA should accept restricted grants only when it can comply with the conditions set by the funder. Unrestricted funds are donations the CMIA may use for any purpose, including overhead, programming, or any other permissible purposes.

4.2 The CMIA may choose to accept restricted funding only when the Center has determined that the administrative management of all restricted funding is compatible with the CMIA's organizational capacities.

4.3 The CMIA will examine the following additional factors in determining whether to accept restricted funding:

4.3.1 Whether the CMIA has determined that the permitted use(s) of funding complies with the Center's policies and procedures for using donations;

4.3.2 Whether the CMIA has determined under a cost-benefit analysis that accepting restricted funding does not inhibit the mission and goals of the Center; and

4.3.3 Whether the CMIA has determined that the level of control, if any, sought by the funder providing the restricted funding over future policies or projects of the Center is within a range the Board of Directors deems acceptable and conforms to the standards established by this Policy.

ARTICLE 5 Principles of Funder Selection

5.1 The CMIA shall evaluate funder-specific characteristics prior to accepting funding from any funder. These characteristics include whether:

5.1.1 CMIA determined that the funder meets the qualifications set forth in this Policy based on the funder's type of organization or entity and the type of funding the funder is providing.

5.1.2 The CMIA has performed any review deemed necessary to establish that the funder meets the appropriate standards set forth in this Policy or any additional qualifications the Center determines are appropriate given the size, amount, or nature of the funder's proposed funding.

5.1.3 For the CMIA to accept funding from any type of funder, the CMIA must have determined that the funding meets the following criteria:

(a) Accepting funding does not mean that the Center has any other relationship to the funder, including exercising any control over the funder;

(b) Accepting the funding does not state or imply any corresponding obligation from the Center in exchange for the funding except as where mutually agreed in writing;

(c) Accepting the funding does not grant the funder any rights of supervision or control or editorial control over the CMIA's activities;

(d) Accepting the funding does not state or imply that the funder has received or been appointed to any position or role within the CMIA, except as where mutually agreed in writing.

ARTICLE 6 Procedures for Funds Acceptance

6.1 For donations exceeding \$10,000, funding proposals will be subject to review by the Board of Directors establishing that the conditions set forth in Article 2 and Article 3 of this Policy, in addition to any additional limitations or concerns of the Center relating to a certain funder or a certain donation, have been met.

6.2 For all donations, the CMIA will determine that accepting the funding complies with the relevant criteria and procedures set forth in this Policy prior to accepting the funding.

ARTICLE 7 Communications

7.1 The relationship of the CMIA and the funder shall be made public upon acceptance of the funding through any means to which the Center and the funder agree, which may include, but are not limited to press releases, website and social media publication, spoken interviews, conference or other activity sponsorship and logo placement.

7.1.1 The funder may state its support to the CMIA in its own communications with the public;

7.1.2 The funder may publicize the nature of specific projects or actions the funding allowed the CMIA carry out, if the funding was specifically earmarked for those projects or actions, if the funding was used entirely for a specific project or action, or under other conditions that the Center and the funder agree comply with the principles set forth in this Policy; and/or

7.1.3 The CMIA may list the name of the funder and the amount of the funding in its public communications, on its website, or in other materials of a similar nature, in a manner in which the funder has agreed to be so acknowledged by the CMIA.

7.2 The CMIA shall not disclose any privileged or confidential information that it possesses about the funder, the funding, or any funding intent attached to the funding to any unauthorized parties, unless the CMIA and the funder have previously agreed that such disclosure is permissible.

ARTICLE 8 Transparency

8.1 The relationship of the CMIA and the funder shall be made public upon acceptance of the funding through any means to which the Center and the funder agree.

8.1.1 The funder may state its support to the CMIA in its own communications with the public;

8.1.2 The funder may publicize the nature of specific projects or actions the funding allowed the CMIA to carry out, if the funding was specifically earmarked for those projects or actions, if the funding was used entirely for a specific project or action, or under other conditions that the Center and the funder agree comply with the principles set forth in this Policy; or

8.1.3 The CMIA may list the name of the funder and the amount of the funding in its public communications, on its website, or in other materials of a similar nature, in a manner in which the funder has agreed to be so acknowledged by the Center

8.2 The CMIA shall not disclose any privileged or confidential information that it possesses about the funder, the funding, or any funding intent attached to the funding to any unauthorized parties, unless the Center and the funder have previously agreed that such disclosure is permissible.

8.3 The CMIA shall publish accurate reports on its income and expenditures (including expenses incurred in soliciting contributions, gifts and grants), that meet the standards set forth in the U.S. tax code and provide clear information on its activities for stakeholders, beneficiaries, funders and the public.

8.4 The CMIA shall provide regular reporting on the actions and projects that it was able to carry out through to the funds received from its funders.

8.5 In case of restricted funding, the Center may mention funding received in its communication relating to the specific project or action that was funded, except when the funder does not want to be recognized for its restricted grant.

8.6 When funding is received, the CMIA shall provide information about the managers of the Center, including their relationships with other non-profit organizations and any compensation received, monetary or otherwise, where the CMIA deems such disclosure is appropriate, including if there is an existing relationship between the funders and any member of the Center.

Annex: CIMA Checklist for Donations Valued at Less Than/Exceeding £10,000

For donations valued at less than \$10,000, the CMIA shall seek the Board's approval whether the CMIA should accept such donation. They do not need the additional scrutiny noted below but acceptance of all donations will nevertheless be subject to the conditions set forth in the Policy

For donations exceeding \$10,000, funding proposals will be subject to review by the Board of Directors establishing that these conditions are met in addition to any further limitations or concerns of the MIAating to a certain funder or a certain donation:

- The CMIA considered the procedural aspects of the funder's funding process and reviewed them against transparency and freedom of information standards.
- The CMIA determined that by accepting funding there is no inappropriate influence over the programming of the CMIA.
- The CMIA undertook a conflict of interest review with potential projects of the funder to determine that there are no conflicts.
- The CMIA determined there will be no harm to its reputation if it accepts funding/associate with the proposed funder. The CMIA has also determined the source of funding to ensure compliance with applicable money laundering laws.
- The CMIA confirmed that any costs/activities proposed by the funding are consistent with its own internal policies.

Foundation Funders: The CMIA will accept funding from foundations only when the following criteria are met:

- The CMIA is aware of the funder's source of the funds (i.e. private funds, religious funds, corporate foundation funds, etc.).
- The CMIA determined that there are no conflicts in regard to the funder's mission and programs.
- The CMIA reviewed the history of the foundation and found no issues/reasons that it should not accept funding on that basis.
- The CMIA determined there are no conflicts with itself and the business interests of the CMIA.

- The CMIA evaluated the public perception of the funder and its history of reporting on its activities and sees no issue with accepting funding from it.

Corporate Funders: The CMIA will accept funding from corporate funders only when the following criteria are met:

- The CMIA established clear protocols that distinguish between funding, advertisement, and sponsorship of the founder.
- The CMIA determined the funder has not participated in deceptive advertising or promotional practices.
- The CMIA determined the funder will not adversely affect the CMIA by association.
- The funder is not engaging in any unlawful or unethical business practices/any business practices do not interfere with the CMIA's principles.

Individual Donations: The CMIA will accept individual donations only when the following criteria are met:

- The CMIA determined any individual influence is negligible and will not impact the CMIA's mission.
- The CMIA determined there are no corruption or similar concerns related to the funder.
- The CMIA determined that it has the capability to comply with any privacy concerns of the funder.

Public Collection Donations: The CMIA will accept public collection donations only when the following criteria are met:

- The CMIA has determined the funder records its collections in a verifiable manner and only partakes in donation-based crowdfunding.
- The CMIA determined the practices used to collect funds comply with the ethical standards set forth by the CMIA, such as:
 - Collectors do not obstruct people's way on the street or use other aggressive methods when soliciting donations in public.
 - Collectors do not mislead people to try and collect donations.
 - Collectors respect people's decisions not to donate.

Academic Institution Funding: The CMIA will accept funding from academic institutions only when the following criteria are met:

- The CMIA has determined that there is no conflict of interest and the CMIA has not compromised its credibility.

Crowdfunding: The CMIA will consider the following factors when deciding to accept crowdfunding:

- The CMIA has received prior approval from the Board.
- The CMIA has determined that the crowdfunding platform has an acceptable reputation as do the participants of the crowdfunding platform.
- The CMIA has reviewed the compliance checks the crowdfunding platform undertakes and believes them to be appropriate and reasonable.