

TreeSisters Fundraising and Business Partnership Policy

1. Purpose

- 1.1. TreeSisters may enter into engagements with business entities in ways that support our strategic and charitable objectives. The purpose of this document is to describe the policy for such engagements and to provide clear guidance in accordance with the fundraising regulations¹.
- 1.2. **Our Invitation:** TreeSisters actively invites business entities to do as much radical good as they can on behalf of the forests.
- 1.3. **Our mission:** Our core mission is to make it as normal to give back to Nature as it currently is to take Nature for granted. This paradigm shift requires a scale of reach and educational momentum that we cannot achieve alone. We look to build an alliance of aligned business partnerships in support of this mission.

2. Applicability

- 2.1. This policy covers TreeSisters accepting and raising charitable donations from and through business entities.
- 2.2. This policy applies to all business entities including (but not exclusively) for profit, not-for-profit, all forms of social enterprise and self employed individuals.
- 2.3. For the purposes of this policy, as prescribed by generally accepted definitions of financial control, if a company is owned 51% or more by another company, the Alignment and Direct Involvement due diligence process should include the activities of the parent company (see below for Alignment pledge and criteria)
- 2.4. For the purposes of doubt this policy also applies to all charitable funds raised from business entities whether as passive donations, Commercial Participators, Commercial Partners or Professional Fundraisers.
- 2.5. In addition to the “Excluded List” business activities - those that are outlined in detail in this policy - TreeSisters reserves the right to refuse to enter into partnership and to decline passive and/or direct donations from any business entities deemed a risk to its reputation. Such risky business sectors or activities will be deemed to be “Grey List” and will be subject to a **Grey List Funding Consideration Process** before TreeSisters is able to accept a donation. Examples of Grey list sectors include: the oil, gas and coal extraction industry; the tobacco industry; and the arms industry. This is not an exhaustive list.

3. Alignment

Our preference is to work with those who value and thus amplify the holistic approach and invitation of TreeSisters. Partnerships with business entities will be evaluated for alignment with our mission and vision in four key areas:

- (1) TreeSisters’ values.

¹ This policy has been developed in compliance with Part II of the Charities Act 1992 for England and Wales Control of Fundraising for Charitable Institutions. It was approved at the TreeSisters Board of Trustees meeting on 8 October 2020.



(2) No greenwash.

(3) No direct involvement in Destructive Forest Activities or Activities that Threaten High Conservation Values (HCVs).

(4) TreeSisters Business Partnership Policy implementation at the business partner level.

The Alignment Pledge and Evaluation

It is our intent to use our relationships as a mechanism to provide business partners with inspiration and education to shift from consumption to restoration across their business activities. Recognising that different businesses are at different stages of transition and scale we will evaluate potential business partnerships against a set of criteria we consider appropriate to the size and activities of that business. The alignment requirements for various levels of business donors are included as Appendix 1.

We have selected our alignment criteria based on the issues most directly tied to our mission, vision, strategies and charitable objectives. We believe that stopping destruction of forests is a critical issue intricately tied to our reforestation work which is why we highlight this issue and choose not to partner with those directly involved in either destructive forest activities or activities that threaten High Conservation Values (HCVs). And, by clearly stating our alignment criteria we invite an open conversation with business entities to encourage and support the transition to more sustainable and restorative practices.

3.1. TreeSisters values. Partners agree to respect the TreeSisters values:

TreeSisters plant five powerful choices into the core of their being. They are the seeds of a Restorer Species.

1. Humility (Consideration) - We choose to wake up and get real about how things really are, both in our own lives and in the greater world. Facing the truth, dealing with what is, and no longer looking away.
2. Unity (Encouragement) - We choose co-creation over solo experience and choose community and collaboration (the shared field of transparency and trust) as the ground from which we grow the organisation and call each other into our most authentic selves on behalf of Earth.
3. Connection (Intimacy) - We choose to really feel how things are – to experience our bodies as part of Nature as we learn how to listen to and embody our wholeness, wildness and natural flow.
4. Right Action (Responsibility) - We choose to take action from a place of deep listening through heart and body, so that our actions serve connection and we operate in ways that bring heart, mind, body and world into balance and well-being.
5. Service (Courage) - We choose to give of our hearts, passions, creativity and gifts in ways that grow ourselves and each other in our collective awakening and service on behalf of life and the natural world.

3.2. No Greenwash. TreeSisters has zero tolerance for greenwash.

3.2.1. Greenwash is a TreeSisters Excluded List activity.

3.2.2. Partners agree that any communication about their efforts to be environmentally and

ethically responsible or sustainable will be truthful and that relevant green and ethical claims guidelines, including the rules of any independent verification systems used, shall be followed.

- 3.2.3. TreeSisters defines greenwash as “disinformation disseminated by an organisation so as to present an environmentally responsible public image”²
 - 3.2.4. We are especially sensitive to greenwash claims about forests, their management and wood derived products and need to ensure there is no evidence of such misleading claims.
 - 3.2.5. TreeSisters is guided by UK government advice on green claims.³
 - 3.2.6. We operate by the ‘no claim, no shame’ principle: We will not shame a company for its (poor) level of progress (provided that it is not directly involved in Destructive Forest Activities (see below)). However we cannot engage with a company that makes false/misleading claims about wood and wood products.
 - 3.2.7. Further information and guidance is available in the [TreeSisters Greenwash Guidance document](#)
- 3.3. **No Direct Involvement in Destructive Forest Activities or Activities that Threaten High Conservation Values (HCVs).** TreeSisters will not accept charitable donations from business entities that are **Directly Involved** in **Destructive Forest Activities** or **Activities that Threaten High Conservation Values (HCVs)** - these are considered by TreeSisters to be Excluded List activities, see following definitions:
- 3.3.1. A **Forest** is defined by TreeSisters to include “Forest and Other Wooded Land” as defined by the FAO.⁴
 - 3.3.2. **Destructive Forest Activities**⁵ are defined by TreeSisters as:
 - i. Illegal logging of wood or illegal harvest of other forest products;
 - ii. Significant⁶ conversion of forests to plantations or non-forest use;
 - iii. Violation of traditional and human rights in forest contexts (including in forest community areas where forests have already been felled);

² Oxford English Dictionary April 2019 <https://www.lexico.com/en/definition/greenwash>

³ <https://www.gov.uk/government/publications/make-a-green-claim>

⁴ FAO (2015) *Terms and Definitions. FRA 2015. Forest Resources Assessment Working Paper 180. Pg 3 & 4. Food and Agricultural Organization of the United Nations. Rome.* <http://www.fao.org/3/ap862e/ap862e00.pdf>

⁵ These Destructive Forest Activities are derived from and based on The Forest Stewardship Council’s *Policy for the Association of Organizations with FSC*. 2011. FSC-POL-01-004 V2-0 EN. FSC. Bonn. Please note that there are differences between the TreeSisters and FSC policy. <https://ic.fsc.org/en/document-center/id/30>

NB: There are some key differences between the *FSC Policy for Association* and the above TreeSisters policy based on it: TreeSisters uses a different definition of *Directly Linked* to that included in this FSC policy. The elements listed above as TreeSisters policy differ from the text used in the FSC policy. TreeSisters specifically does not extend the scope of application of this policy to what FSC defines as *Indirectly Linked* companies.

⁶ As defined by FSC in its *Policy for Association*.

- iv. Destruction of high conservation values⁷ (HCVs) in forest contexts (including in areas where forests have already been felled and remnant forest related HCVs remain);
- v. Introduction or use of genetically modified organisms in forest contexts;
- vi. Violation of any of the International Labour Organization (ILO) Core Conventions in a forest context (as defined in the ILO Declaration on Fundamental Principles and Rights at Work).

3.3.3. **Activities that Threaten High Conservation Values (HCVs)⁸** are defined by TreeSisters as activities that threaten any of the following HCVs:

- i. HCV1 - Species Diversity. Concentrations of biological diversity including endemic species, and rare, threatened or endangered species, that are significant at global, regional or national levels;
- ii. HCV 2 - Landscape-level ecosystems and mosaics. Large landscape-level ecosystems, ecosystem mosaics and Intact forest landscapes (IFLs) that are significant at global, regional or national levels, and that contain viable populations of the great majority of the naturally occurring species in natural patterns of distribution and abundance;
- iii. HCV 3 - Ecosystems and habitats. Rare, threatened, or endangered ecosystems, habitats or refugia;
- iv. HCV 4 - Ecosystem services. Basic ecosystem services in critical situations, including protection of water catchments and control of erosion of vulnerable soils and slopes;
- v. HCV 5 - Community needs. Sites and resources fundamental for satisfying the basic necessities of local communities or Indigenous Peoples (for example for livelihoods, health, nutrition, water), identified through engagement with these communities or Indigenous Peoples;
- vi. HCV 6 - Cultural values. Sites, resources, habitats and landscapes of global or national cultural, archaeological or historical significance, and/or of critical cultural, ecological, economic or religious/sacred importance for the traditional cultures of local communities or Indigenous Peoples, identified through engagement with these local communities or Indigenous Peoples.

3.3.4. **Direct Involvement** is defined by TreeSisters as when a business entity is:

⁷ As defined by FSC in its *Glossary of Terms*: <https://fsc.org/en/document-centre/documents/resource/207>. Further information and in depth guidance is available from the High Conservation Value Network (HCVN): <https://hcvnetwork.org>. Please note that while HCV was originally a definition developed within the FSC system it is now applied more widely than to just forest landscapes via the HCVN. In this TreeSisters policy we reference HCV as both a set of specific values within forest contexts and in natural ecosystems and habitats in general. Up to date guidance on defining HCVs in forest contexts can be found here: <https://fsc.org/en/newsfeed/high-conservation-value-hcv-guidance-documents-published>

⁸ As defined by FSC in its *Glossary of Terms*: <https://fsc.org/en/document-centre/documents/resource/207>. Further information and in depth guidance is available from the High Conservation Value Network (HCVN): <https://hcvnetwork.org>. Please note that while HCV was originally a definition developed within the FSC system it is now applied more widely than to just forest landscapes via the HCVN. In this TreeSisters policy we reference HCV as both a set of specific values within forest contexts and in natural ecosystems and habitats in general. The wording used by FSC and the HCVN is almost identical, there are very minor word order and title differences; the wording used here in this section best reflects general HCVs rather than only forest specific ones, See guidance documents available from the HCVN: <https://hcvnetwork.org/libraries/>.

- i. Undertaking the damaging activity itself; or
- ii. Directly ordering the damaging practice to happen by commissioning it via the engagement of a third party; or
- iii. Investing in the damaging practice of a third party company, is set to receive a return and could therefore potentially profit from it; or
- iv. A business that advises that a company should undertake or how to undertake damaging activities.
- v. NB: *Directly Involved* does not include: Service providers such as accountants, marketing companies, auditing companies or others that are not set to receive a return directly from the damaging activities (i.e. receives only a set payment for a set standard service that is not advice on the need to or how to undertake damaging activities) and that do not directly carry out the damaging activities.
- vi. NB: *Directly Involved* does include: When a company is owned 51% or more by another company, the Direct Involvement due diligence shall include the activities of the parent company.

4. Alignment Pledge

4.1. We require all business partners (see Appendix 1) to sign the Alignment Pledge confirming:

- 4.1.1. That they respect TreeSisters values (see above):
- 4.1.2. That they are not using greenwash (see above); and
- 4.1.3. That they are not directly involved in Destructive Forest Activities or Activities that Threaten High Conservation Values (see above).

4.2. In addition to the above, Company and Organisation (excluding self-employed individuals) partners pledge (see Appendix 1):

- 4.2.1. To discovering and understanding the source of their forest products;
- 4.2.2. To work on eliminating “High Risk Sources” (defined as those involving Destructive Forest Activities or Activities that Threaten High Conservation Values) from their supply chain;
- 4.2.3. To the development and at least start of implementation of a Positive Forest Products Procurement Policy and other procedures that ensure an increasing amount of forest sourced products⁹ bought and sold by the partner company come from reused or recycled sources or independently verified responsibly managed forests.¹⁰

⁹ Remember that many products are derived from wood and forests that may not be immediately obvious: E.g. Clothing material – viscose, rayon, Modal, TENCEL etc; “non-timber forest products” (NTFPs) such as rattan, rubber, some bamboo, forest-grown nuts, mushrooms or honey, etc. Forest related products also include the packaging that products arrive and are distributed in. All these types of product are included within the scope of this policy.

¹⁰ Currently the highest level performing independent verification standard for forest products, with the widest stakeholder support is the Forest Stewardship Council (FSC) system. Currently only the FSC system offers an assurance of avoidance of the Destructive Forest Activities. This is the system favoured by TreeSisters. There is however a place for lower performing standards as a means of verification of origin and covering an assurance that some of the Destructive Forest Activities are not taking place. These other systems might sensibly also be used in the period of transition to full responsible sourcing.

- 4.2.4. At the end of Year 2 of partnership, we hope to see that as well as those companies and organisations knowing that they are not directly involved in Destructive Forest Activities or Activities that Threaten High Conservation Values, that they also:
- i. Have full knowledge where their forest related products come from;¹¹
 - ii. Have a due diligence system in place that allows for the elimination of High Risk Sources from their supply chain (perfection not required at the end of Year 2; continuous improvement in elimination shall take place);
 - iii. Have a Positive Forest Product Procurement Policy in place and that its implementation has begun.
- 4.3. In addition to that set out above, any business partner intending to engage in high visibility cause-related marketing shall include additional performance criteria (see Appendix 1):
- 4.3.1. Higher proportions of High Risk Sources shall have been eliminated from the company supply chain.
- i. Higher proportions of forest related products shall meet the company's Positive Forest Product Procurement Policy.
- 4.4. TreeSisters shall monitor performance through a process of annual company self reporting. A small proportion of the self reporting declarations shall be audited by a specialist independent third party verifier.
- 4.4.1. The cost of this process shall be borne by the company and the results of the audit fully shared with them, with direct contact to the auditors, their conclusions and recommendations, so that the process is a positive rather than a punitive one.
- 4.4.2. TreeSisters reserves the right to withdraw from partnership with any company due to information from self declared reporting or discovered through independent audit or through other means.
- 4.4.3. The results of independent verification audits shall remain confidential and shall not be shared with any other parties than TreeSisters staff, specialist contractors/consultants under contract to TreeSisters, Board of Directors members and the audited company itself.

5. Review and Approval

The corporate policy shall be reviewed annually or as and when required.

Last updated: 17/12/2020

Document owner: The TreeSisters Board

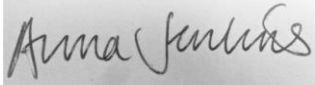
¹¹ For guidance see for example Section 5 in WWF & BSI (2012) PAS 2021:2012

Exercising due diligence in establishing the legal origin of timber and timber products – Guide to Regulation (EU) No 995/2010. Available for free from: <https://shop.bsigroup.com/Navigate-by/PAS/PAS-2021/>

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Approval

This policy has been approved by the TreeSisters Board of Trustees on 17 December 2020



Anna Jenkins, Trustee on behalf of the TreeSisters Board of Directors



Pollyanna Darling, Acting CEO TreeSisters
Date: 18/12/20

Appendix 1 - TreeSisters Tiered Levels of Partnerships

Engagement Level	No Greenwash	No Direct Involvement in Forest Destruction or Activities that Threaten HCVs	Forest Product Supply Knowledge (<i>Where is it from?</i>)	Eliminating High Risk Sources	Positive (Forest) Product Procurement Policy
Individual donation					
Company direct and non-partnership donation	✓	✓			
All Trees for Transactions* Partners Yr 1	✓	✓			
All Trees for Transactions* Partners <i>By the end of Yr 2</i>	✓	✓	✓	✓ (initial elimination phase)	✓ (policy in place and <u>does not</u> have to be 100% implemented)
Catalyst Partners	✓	✓	✓	✓ (increased elimination)	✓ (policy in place with >25% implementation in place)

*Trees for Transactions Partners includes SoulTrees, Company Forest, TreeHouse and Trees for Tickets programs.