

EPHA ETHICAL FUNDRAISING POLICY

March 2026





EPHA GUIDELINES FOR ETHICAL FUNDRAISING

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Contents

Introduction.....	3
Fundamental principles for EPHA fundraising.....	3
Working with commercial actors.....	4
Working with Foundations.....	6
Working with other civil society actors	7



Introduction

The European Public Health Alliance (EPHA) is Europe's leading public health advocacy civil society organisation that actively pursues and creates change to enable health in all policies at the European level. As a membership organisation, EPHA represents more than 40 European umbrella and national organisations with shared vision and aims.

EPHA's funding sources include membership fees, research and action grants from the European Commission, and grants from philanthropies. In the past, EPHA had received income from consultancy, advocacy, and logistical services provided mainly to EPHA members. Until 2024, EPHA was a holder of core Operating Grant from the European Commission.

EPHA is required to expand its funding base in order to sustain and strengthen its work. The EPHA Guidelines for Ethical Fundraising, hereinafter referred to as "The Guidelines", are intended to ensure that all fundraising is ethically sourced and managed, respects EPHA's strategic vision, mission, objectives and basic operating principles, and ensures EPHA's independence, sustainability and full transparency. The Guidelines apply to projects, partnerships, conference collaborations, and other joint activities, including with EPHA member organisations.

The Guidelines set out:

1. Fundamental principles for EPHA fundraising
2. Rules for working with commercial actors
3. Rules for working with foundations
4. Rules for working with other civil society actors

Fundamental principles for EPHA fundraising

EPHA is a not-for-profit, non-governmental organisation that acts as a counterweight to those commercial economic interests that have damaging effects on health. It strives to provide a genuine avenue for citizens' concerns related to public health and, as such, must maintain independence and integrity in order to achieve its objectives, allowing it to position itself in public health policy without being influenced by vested interests. EPHA's independence from commercial interests is a core organisational asset and a precondition for any engagement with commercial or philanthropic funders.



The following principles must be followed in all forms of relationships, financial or otherwise, with both profit and not-for-profit partners:

1. EPHA shall only accept funding and other relationships that are consistent with its mission and assist the organisation to achieve its mission, vision and objectives.
2. EPHA will not have any relationship with organisations primarily engaged and/or associated with the manufacture, promotion, or sale of commercial products or services which are against EPHA's mission (for example tobacco, alcohol, arms, unhealthy food, fossil fuels, gambling)¹.
3. No organisation providing funding, including sponsorship and grants, and/or in-kind support may influence or have any input into the formulation of EPHA's strategy, internal governance, and work plans.
4. EPHA will be transparent about all of its relationships including providing full financial disclosure².
5. All funding agreements, including sponsorship and grant, and/or agreements on in-kind support to EPHA will be regulated by a written contract, to be signed by all parties before activities commence and/or money changes hands. The contract will reflect the fundamental principles and additional considerations as set out in the Guidelines.
6. EPHA reserves the right to terminate any funding relationship at any time if continued engagement risks undermining its mission, independence, or public credibility.

Working with commercial actors

In order to strengthen EPHA's financial sustainability, it may be necessary to enter into partnership agreements with commercial actors to receive grants for events, projects and conferences.

For the purposes of these Guidelines, commercial actors are understood as organisations or entities whose activities are primarily driven by commercial or profit-seeking interests. This includes, but is not limited to, industrial and manufacturing

¹ This list is indicative only and is not intended to be exhaustive. The EPHA Management Board will decide on a case-by-case basis while respecting the above-mentioned principles.

² By reporting all income and in-kind support from donors and partners in the EPHA annual report



activities; agricultural and agri-food production; energy and resource-based sectors; and financial, insurance, and investment activities.

Commercial actors may include pharmaceutical companies, healthcare providers, food and beverage companies³, and other profit-making organisations with which EPHA may engage in order to pursue its strategic objectives.

Foundations, philanthropic entities, or other intermediaries that are established, funded, or otherwise closely linked to commercial actors are considered, for the purposes of these Guidelines, to carry indirect commercial interests. This definition applies regardless of the legal form of the entity or the channel through which funding is provided.

In working with commercial actors, the following additional considerations apply:

1. Where funding ultimately originates from commercial actors, EPHA will, as a matter of principle, give preference to funding channelled through independent foundations established by such actors, rather than direct funding from the commercial entity itself.
2. As a general rule, and in order to safeguard its independence, EPHA will prioritise non-restricted funding, particularly where funding originates directly or indirectly from actors with commercial interests. This does not preclude the acceptance of restricted funding, provided that all principles set out in these Guidelines are fully met.
3. Events, projects or conferences organised by EPHA will preferably be funded by more than one commercial actor or co-funded by EPHA.
4. All funding agreements with commercial actors or foundations linked to commercial actors shall include a clearly defined and enforceable firewall clause, established in advance, explicitly excluding any influence over EPHA's policy positions, publications, advocacy outputs, or public communications. Such agreements will be discussed and agreed upon by the Management Board and the Director General.
5. Such firewall provisions shall be actively monitored throughout the duration of the agreement, and any breach shall constitute grounds for immediate withdrawal from the partnership. Responsibility for ensuring compliance with

³ Unless they are covered by 1.2 above



firewall provisions rests with EPHA's Director General, under the oversight of the Management Board.

6. There must be complete transparency about sources of commercial actor funding. All funding, including sponsorship and grants, and in-kind support will be reported on the appropriate section of the EPHA website.
7. The use of logos and visual identity in relation to commercial actors is subject to strict limitations. Commercial actors' logos shall not appear on EPHA websites, publications, or communications, and EPHA's logo may not be used by commercial actors for promotional, marketing, or reputational purposes. Any exception, limited to factual project-related materials, must be explicitly agreed in advance and in writing by EPHA.
8. For meetings organised by external partners and agreed to by EPHA, a written agenda must be circulated in advance. All minutes and records of meetings of activities and events undertaken by EPHA and supported by external partners must be submitted to EPHA for approval prior to publication.
9. External entities, including commercial actors and foundations linked to commercial interests, may not publicly list EPHA as a speaker, supporter, partner, or participant in any event, publication, or activity without prior written confirmation from EPHA. Any unauthorised public association shall be subject to immediate correction or removal upon request.
10. The Director General and Management Board will assess each new partnership with a commercial actor on a case-by-case basis in line with the fundamental principles and additional consideration as listed above.

Working with Foundations

Foundations play an increasingly important role in funding civil society activities in the EU. While they often offer less burdensome reporting requirements than many commercial actors, engagement with foundations can raise legitimate concerns regarding decision-making autonomy and strategic direction.

EPHA therefore applies the same rigorous ethical standards when working with foundations as when working with commercial actors, particularly with regard to safeguarding independence and preventing any influence over the organisation's strategic priorities, policy positions, or public communications.

Each potential foundation partnership shall be assessed on a case-by-case basis by the Director General and the Management Board, including decisions on the use of EPHA's name, logo, or visual identity.



Working with other civil society actors

The fundamental principles set out in Section 1 also apply to EPHA's collaboration with other not-for-profit organisations, including NGOs, trade unions, networks, and privately run not-for-profit entities. Such collaboration may take the form of joint advocacy, provision of logistical or technical support, or jointly implemented projects and campaigns with fundraising implications.

Consistent with its mandate as a membership organisation, EPHA will, where opportunities arise, prioritise collaboration with its members over external civil society actors. Where EPHA may be applying separately for the same tender as one of its members, the Management Board shall decide whether to pursue the application, taking into account transparency, fairness, and potential impacts on the membership.

While mutual transparency is encouraged in the spirit of collaboration, EPHA does not expect its members to inform it of their intention to apply for a bid and, equally, where an EPHA member does not inform EPHA of its intention to apply for a bid that EPHA is tendering for, EPHA shall not be held responsible for creating undue competition.

Any conflicts of interest arising in the context of the application of these Guidelines – including in relation to commercial actors, foundations, public or international institutions, and other civil society organisations – shall be promptly disclosed and managed in accordance with EPHA's Code of Conduct on Conflicts of Interest. This obligation applies to members of the Secretariat, the Management Board, and EPHA member organisations.

The Director General and EPHA Management Board will regularly review these guidelines.