

**UKRAINE DEVELOPMENT CHARITY
POLICY PRINCIPLES TO PRESERVE INDEPENDENCE**

5 MAY 2024

1. The Trustees of the Ukraine Development Charity (“the Charity”) today adopt the following policy principles to preserve the independence of the Charity in light of the fact that there are two connected organisations that are non-charitable (under English law): the Ukraine Development Charitable Trust (an entity organised under the laws of Ohio that is registered as a not-for-profit entity with the United States Department of the Treasury) and the Ukraine Development Trust (a non-charitable trust organised under the laws of England and Wales).
2. Each of these three entities has different goals and principles of organisation and management, and the Trustees agree that it is imperative that separate accounts, management documents and all other records are kept in respect of each entity.
3. The Trustees recognise and acknowledge these differences and will ensure that the resources of the Ukraine Development Charity will be deployed only for the charitable purposes stated in its Statutes and associated policy documents and not for any other purpose whether a purpose of either connected entity or otherwise.
4. The Trustees acknowledge that in serving as Trustees of the Ukraine Development Charity they are subject to English charities law and that they must operate at all times within the scope of that law and all pertinent applicable and associated rules.
5. The Trustees will ensure that inappropriate control or influence in decision-making on the part of the Ukraine Development Charity or any other person or organisation associated with the Charity does not take place; and they acknowledge this as a principal duty on their part as charitable trustees under English law.
6. The Trustees acknowledge that they are particularly aware of the risk of reputational harm to the Charity by association with the activities of connected entities and in their management and other decisions relating to the Charity they will take all necessary measures to uphold the high reputation of the Charity and to disassociate it from activities of connected entities that might cause the Charity’s reputation to suffer.
7. The Trustees will take every necessary measure to prevent inappropriate support to, or benefit to, persons, organisations or purposes connected with the Charity that do not fall within the scope of the Charity’s legitimate charitable purposes.
8. The Trustees will take every necessary measure to prevent public confusion between the Charity and any connected entity.
9. For the aforementioned purposes the Charity will maintain separate bank accounts from any connected entity and will not transfer funds to the accounts of any connected entity save pursuant to an agreement in writing that the funds in question will be used only for the Charity’s charitable purposes in English law.
10. When soliciting donations (whether to the public at large or specifically) the Trustees and any associated person or organisation will identify the Charity as a distinct entity from any connected entity or associated organisation and will highlight that the Charity has specific charitable purposes under English law that may be different from the purposes of any connected entity; and that funds held by the Ukraine Development Charity shall be used for the charitable purposes of the Charity only and not for any other purpose.
11. Where it appears that a donor has donated funds to the Charity under a misapprehension as to the Charity’s purposes, then the donor in question shall be informed forthwith of the Charity’s exclusively charitable purposes under English law and the donor shall be given the opportunity either to agree to the donor funds being used for exclusively charitable purposes or for the funds to be returned to the donor (if that is lawful).
12. All documentation issued by the Charity shall make it clear that the Charity is a distinct entity from any connected entity with distinct charitable purposes, and all representations by the Trustees or by any other person associated with the Charity shall be to the same effect.
13. The Trustees shall procure that at all relevant times the website www.development-foundation.org and/or any other website managed by for or on behalf of the Trustees relating to the Charity clarifies the distinctive charitable purposes of the Charity in contrast to the purposes of any connected entity, and in particular makes it clear that donations to the Charity cannot be used for military or political purposes. This particular stricture will also apply to any other marketing materials issued by the Charity.
14. The Trustees shall review these Policy Principles and their operation from time to time to ensure that the independence of the Charity is being preserved in their application and shall make due additions or adjustments where they perceive any risk to the independence of the charity as herein above described and as a matter of English charities law.