

STANDARDS AND CONDUCT OUR APPROACH

Standards and conduct at CAF

We are CAF and we exist to make giving go further, so together we can transform more lives and communities around the world.

We are a charity, a bank and champion for better giving, and for over 90 years we've been helping donors, companies, charities and social organisations make a bigger impact.

The CAF family consists of a UK-registered charity together with its subsidiaries, including CAF Bank, CAF Financial Solutions Ltd (CFSL), CAF Investments Ltd and CAF Venturesome. CAF operates internationally, through CAF America, CAF Canada and a network of affiliates in Brazil, Southern Africa, India, Australia and New Zealand, Bulgaria and Türkiye.

It is through this group of organisations that we deliver our mission around the globe.

Doing business the right way

We strongly believe that acting with integrity, and maintaining the highest possible standards is central to everything we do to support donors, organisations and communities in the UK and around the world.

We expect all staff to act with integrity and do the right thing. All CAF employees are expected to actively promote and robustly support our principles and be willing to challenge poor behaviour wherever it occurs.

Putting customers and charities at the heart of our business

We value all of our customers because they share our desire to make a real difference to society, wherever they are in the world. We aim to build trust with our customers by ensuring that we treat them fairly and deal with them in an open and transparent way. We encourage feedback and listen to customers' ideas and concerns.

We aim to provide the means to facilitate charitable giving in the most effective and mutually beneficial way possible and enable charities to make the best use of the funds they have.

If we do get things wrong, we investigate any complaints quickly, thoroughly and fairly.

Supporting our donors and charities

We will contribute positively to the needs of our donors and the charities we work with, to provide the support needed to help achieve a lasting social impact and improve the communities that they support.

We value the contribution our donors make and will not tolerate any undue pressure being applied to any donors or charities.

Being a responsible lender

We have extended our support of the charitable sector by providing secured loans through our subsidiary, CAF Bank and unsecured loans through Venturesome, our social investment arm. As part of our commitment to our sector, but also to the principles of responsible lending, we only lend to established charities that are able to demonstrate both a proven ability to repay a loan and that the purpose of the loan fulfils its charitable goals.

Avoiding discrimination

We have no political allegiance and are neutral to any particular cause. We do not discriminate against any individual or group on any grounds, whether this relates to age, disability, sex, race or religion.

Being a great place to work

We want colleagues to enjoy working at CAF, and strongly believe that, in delivering real value to the charitable sector, we must provide a working environment that provides the same level of social care and consideration. We ensure that staff are supported to develop their careers and provide a great service to our customers, whilst at the same time ensuring that they work free from any discrimination, harassment or bullying. We do not tolerate such breaches of respect for others. Procedures are in place to deal with any disputes, and the CAF Whistleblowing Policy ensures that employees are able to speak out confidentially if they suspect any wrongdoing at work.

We are proud to hold the Investors in People Silver standard.

Working with suppliers

We expect any company that we work with directly, or which is part of our supply chain, to adhere to the same principles of ethical behaviour that we uphold. We expect our suppliers to comply with the Modern Slavery Act 2015 by protecting human rights, not exploiting staff, ensuring that working practices reflect minimum local standards and laws and by making sure that all employees are treated fairly.

We also expect our staff to raise concerns about any issue or suspicion of modern slavery in any part of our business, or by our suppliers, at the earliest possible stage.

Protecting the environment

In addition to providing support to a range of environmental charities, we also actively protect the environment by using our resources as effectively as possible and promoting environmental responsibility with our colleagues. We've undertaken a review of our energy usage and continue to work to further reduce the carbon footprint across our offices.

Acting with integrity

We uphold our integrity and reputation in everything we say and do - protecting our sector, our customers and our stakeholders. We protect our customer's personal information and have monitoring systems in place to ensure that these remain secure. We have established adequate procedures, including system and controls to deter and prevent financial crime.

We also have clearly defined rules in relation to the giving or receiving of benefits, gifts, entertainment or hospitality. We have processes in place to identify and manage any conflicts of interest which may arise in the course of our business. Furthermore, we have an established AntiBribery and Corruption Standard which explicitly prohibits the payment, offer, acceptance or request of a bribe by anyone within CAF or anyone acting on our behalf.

CAF is regulated by the Charity Commission and is registered with the Financial Conduct Authority for Anti-Money Laundering. CAF Bank is regulated by the Financial Conduct Authority and the Prudential Regulation Authority, CFSL as a solo regulated firm is regulated by the Financial Conduct Authority, and all members of the CAF Group act in full compliance with the regulatory rules and applicable laws relevant to our operations.

Policy statements

We operate our businesses in accordance with a number of board-approved policy statements and standards which are designed to protect our donors, charities and ourselves and to ensure continued successful, financially sound operations.

We comply with all relevant legislative and regulatory requirements and our policies include:

Conflicts of Interest Policy

This policy ensures that we avoid situations in which our colleagues' interests' conflict or appear to conflict with the interests of CAF or our customers, whether these are financial or non-financial interests.

We don't accept gifts, entertainment or benefits in kind from persons or entities who deal with us if this might reasonably be perceived to influence our decisions.

Data Protection and Privacy

This policy governs the way in which we collect, retain and use personal data. We aim to ensure that we only hold personal data for as long as it is needed, and that it is held securely. We take data protection and privacy very seriously and ensure that all staff undertake training on this at least once a year.

Data Security and Payment Card Industry Data Security Standards (PCI-DSS)

We process personal data and align our processes to comply with industry standards such as ISO27001. We are compliant with the PCI Data Security Standards and have an established procedure to keep abreast of the latest security issues to mitigate risk exposure for our donors and charities.

Risk Governance

We have an established framework which reviews all potential risks that could affect our activities, whether these are due to internal factors such as staffing, financial resources or processing changes or external factors such as changes to legislation or the wider economic outlook. Business risks are reviewed and monitored on an ongoing basis and reported to appropriate board committees and the Board of Trustees.

A formal Business Continuity Plan is in place to ensure that our businesses are able to continue normal operations or get back to business as usual within a short timeframe, in the event of a major incident. This plan is subject to regular testing and review.

Anti-Money Laundering / Counter-Terrorism Financing

Financial crime is a major issue for all financial institutions, and we aim to ensure that we protect our donors and charities by having established processes and dedicated staff in place to undertake appropriate checks and monitoring on an ongoing basis. As well as having an ethical responsibility to prevent money laundering and terrorist financing, we also have a legal obligation to do so - which is why we take all necessary steps to ensure that we know who our donors and charities are and who they are doing business with. We comply with the relevant UK legislation regarding Anti-Money Laundering and Counter-Terrorism Financing.

Anti-Bribery and Corruption

We comply with the Bribery Act 2010 and have a zero tolerance towards any acts of bribery or corruption by any colleagues, suppliers and others with whom we do business. Our policy sets out clearly the prohibitions on offering, promising, giving, requesting, accepting or agreeing a bribe of any kind. This extends to include gifts and entertainment which could be deemed to be excessive or inappropriate in order to exert any improper influence.

Criminal Finances Act

We comply with the Criminal Finances Act 2017 and have a zero tolerance towards any acts leading to the facilitation of tax evasion by CAF colleagues, suppliers and others with whom we do business. Our policy sets out clearly the prohibitions on facilitating tax evasion of any kind by employees or other associates. This extends to include the failure to prevent the facilitation of UK and foreign tax evasion, by a person associated with a 'relevant body'.

Competition / Anti-Trust

We abide by the laws prohibiting anti-competitive behaviour and ensure that legal advice is sought before entering into any agreements which could be contrary to compliance with the law.

Complaints

We take complaints seriously - both internally and from external parties. We have a policy in place to undertake to investigate complaints thoroughly and take appropriate action; including advising our customers (where appropriate) that there might be possible recourse to an external party should they not be satisfied with our response.

Senior Managers and Certification Regime (SM&CR)

CAF Bank and CFSL are compliant with the Senior Managers and Certification Regime with the aim to reduce harm to consumers and strengthen market integrity by making individuals more accountable for their conduct and competence. The regime sets out to establish healthy cultures and effective governance by encouraging greater individual accountability and setting a new standard of personal conduct. CAF Bank and CFSL have established and implemented policies and procedures to ensure we remain compliant with SM&CR.

If you have any questions or comments about any of our standards, policies or processes please contact our External Affairs team:

Charities Aid Foundation
25 Kings Hill Avenue
Kings Hill
West Malling
Kent ME19 4TA

T: 03000 123 000

E: enquiries@cafonline.org

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