

# Sanctions Policy

October 2022

---

## Background

Following the Russian invasion of Ukraine in 2014, the UK and other countries introduced a package of sanctions measures. This was substantially extended following the further invasion in February 2022.

As The BEARR Trust operates in areas that are subject to international sanctions, we take steps to ensure that our activity in support of humanitarian assistance and the development of civil society organisations is fully compliant.

## Policy statement

The BEARR Trust is determined that its funds shall only be used to further its mission to support civil society organisations working with vulnerable people in Eastern Europe, Central Asia and the Caucasus. Funds must not be used for any illicit purpose by any third party.

The BEARR Trust will not knowingly provide funds or other material support to any individual, government or other entity sanctioned by the international community. We will take all reasonable steps to safeguard the use of our funds from any illicit activity.

## Actions

The BEARR Trust provides direct financial support via our annual Small Grants Scheme and via our Ukraine Appeal. In both cases, we provide small amounts of funding in each transaction (£3,000 and £2,500 respectively) and our funds are made available to community-led CSOs.

We take a proportionate and risk-based approach to sanctions compliance, in line with the Charity Commission's Compliance Toolkit<sup>1</sup> and OFSI charity guidance. Specifically:

- In all cases, we carry out due diligence on the beneficiary organisation, consistent with the relatively small scale of the grant funding requirement and, in the case of the Ukraine Appeal, the need for rapid action in the context of the humanitarian emergency. We require all applicants to complete a proforma specifying their request<sup>2</sup>. This is reviewed by a Working Group of trustees and where possible, we review the applicant's online presence. In the case of the Ukraine Appeal, we limit funds to £1,000 where we have not worked with the organisation before.
- In transferring funds to beneficiaries, we use business-to-business transfer agencies (Western Union International Bank, Wise and Clear Capital Exchange), which are subject to the same compliance regulations as our main UK bank. We

---

<sup>1</sup> Charity Commission (2013), [Protecting Charities from Harm: Compliance Toolkit](#)

<sup>2</sup> This is consistent with the Charity Commission Verification of Proposed Partner Form

occasionally use person-to-person money transfer services, but (in line with OFSI guidance) only in exceptional circumstances.

- We require acknowledgement of receipt. We also require a report from the beneficiary on the use of funds, following every individual grant agreement.
- We carry out due diligence on large donors to The BEARR Trust using the Charity Commission Know Your Donor template.
- Compliance checks are carried out regularly (at least annually) against OFSI's consolidated list of sanctions.

In addition to these measures, we respond in full to all sanctions information requested by our banking and money transfer service providers.

The BEARR Trust does not currently make any grant payments to Russia or Belarus.

## **Review and revision**

This policy shall be reviewed annually, or whenever new guidance is published by the Charity Commission and OFSI.

October 2022