

Policy/Procedure Name:	Ethical Policy for Investment, Trading, Sponsorship and the receipt of Donations		
Policy/Procedure Number:	FIN 007		
Revised Date:	January 2026		
Review by Date:	January 2028		
Policy/Procedure Author:	Finance and Resources Director		
Policy/Procedure Owner:	Finance and Resources Director		
Management Committee Approved By:	TLT		
Trustee/Governor Committee (where appropriate) Approved By:	Finance and General Purposes Committee		
For Action By:	Trustees, members of TLT, Finance Department		
For Information to:	Staff		
Approval requested to upload on the Treloar's Website:	Yes <input checked="" type="checkbox"/> (tick if requested)		
Who is carrying out EIA?	Lorna Woodcroft	Date of EIA?	09/01/26
Have we shown due regard for the 9 protected characteristics within the policy/procedure?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		
Are all opportunities to promote equality taken within the policy/procedure?	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>		
Refer Policy/Procedure to EDI Co-ordinator for further assessment	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>		

1. Policy/ Procedure Aim –

Aim is to inform about Treloar's Ethical Policy for investment, trading, sponsorship and the receipt of donations.

2. Policy/Procedure Details

Guideline

Treloar's adopts an ethical policy drawn on in reference to the charity's objects which are as follows:

To promote the relief of persons with disabilities (whether physical or otherwise) ("Beneficiaries") and in particular but without limitation by any or all of the following:

- 3.1.1 the promotion, provision and maintenance of schools, colleges and other educational establishments;
- 3.1.2 the promotion and provision of care, therapy, treatment and counselling to Beneficiaries;
- 3.1.3 the promotion of employment of Beneficiaries whether by way of the creation and operation of workshops and facilities or otherwise; and
- 3.1.4 improvement of the knowledge, understanding and awareness of the public into the conditions of life and needs of Beneficiaries and in particular but without limitation by the promotion of research and the publication of the useful results of such research.

Treloar's will not knowingly invest in, or accept donation or sponsorship from, organisations whose business or operations are inconsistent with or managed in a way which is inconsistent with these objects, even if by doing so there is a potential impact on the charity's financial performance.

Treloar's shall also give due regard to the potential impact on Treloar's reputation when deciding on investments, contracting, trading, sponsorship or the receipt of donations.

In the event that anyone requires clarification over any aspect of this policy or any particular circumstance, they should discuss the matter in the first instance with the Finance Director.

Enforcement

The Finance Director shall be responsible for ensuring that the Investment Manager, the Procurement Manager and Director of Fundraising are aware of the policy and have procedures in place to enforce. The Investment Manager shall provide annually an Environmental, Social and Governance report (or equivalent) and shall inform the chair of the Finance and General Purposes Committee, if he believes there has been a breach of Treloar's Ethical Policy.

2.1 Key Responsibilities

Policy/Procedure Communication and Implementation Action Plan - Amend and add to as appropriate		
	Action	Responsibility
1	Write to all Investment Managers informing of Policy	Finance Director
2	Circulate Policy annually to staff likely to come into contact with Ethical Issues.	Finance Director
3	Ensure that Annual report reflects Ethical Policy	Finance Director

3. Implications of Policy/Procedure

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Policy/Procedure No: FIN 07

Revised Date: Jan 2026

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3.1 Training Requirements

3.2 Communication Requirements

How will the Policy/procedure be communicated:	eMail
Who will ensure the above communication is carried out::	PA to Finance and Resources Director
Do the changes made to this policy/procedure affect any other policies/procedures? If yes, has this been communicated to the policy/procedure author/owner	No

3.3 Inclusive Communications

If you require this document in an alternative format, such as large print, audio description, or a coloured background, please contact Jo Cox at jo.cox@treloar.org.uk

3.4 Other Implementation Requirements

4. Monitoring and Review

Bi-annually

5. Links to other related policies, procedures or documents (internal)

6. Further sources of information (external)

<https://www.gov.uk/government/publications/charities-and-investment-matters-a-guide-for-trustees-cc14/charities-and-investment-matters-a-guide-for-trustees>

7. References

8. Definitions

9. Revision History

Listed below is a brief audit trail, detailing amendments made to this policy procedure in last 4 years

Page/para No.	Brief description of the change(s)	Change made by	Date
	Reviewed – no changes	Simon Birch	Nov 2021
	Reviewed – minimal changes	Simon Birch	Jan 2024
	Reviewed – minimal changes	Simon Birch	Jan 2026

IMPORTANT NOTES:

It is essential for those with designated responsibilities to familiarise themselves with the sources of information, referred to above.

Policy documents describe mandatory minimum standards and will be subject to audit and review. Line managers are required to ensure suitable and sufficient arrangements are in place to meet policy requirements, including the provision of information and instruction to staff.

Appendix - Equality Impact Assessment (EIA) - Stage 1

Name of Policy / Function/Decision	FIN 007 Ethical Policy				
Name of Assessor / Author /Lead	Lorna Woodcroft				
Start Date	25/1/22				
This EIA is being undertaken because it is:	<i>Delete as appropriate</i> <ul style="list-style-type: none"> • Part of a project proposal submission • A result of organisational change • A result of new policy • A result of a policy revision Other:				
Screening					
Does this affect employees, students or other stakeholder groups? Could the impact be significant to that group of people? Trustees, TLT, Procurement and Finance – impact not significant					N
Will it have a significant effect on how our core business is delivered?					N
Does it involve a significant commitment of resources?					N
Does it relate to an area where there are known inequalities (e.g. gender pay gap, hate crime, accessibility of IT)					N
If the answer to any of these questions is 'YES' then continue to complete Equality impact assessment. If you are unsure about the answer to any of these questions please contact EDI co-ordinator or Head of Quality for further support.					
Has the screening identified the policy/decision/change as having relevance to the any of the following groups?					
Age	N	Disability	N	Sexual Orientation	N
Race	N	Sex/Gender	N	Religion or Belief	N
Gender Reassignment	N	Pregnancy or Maternity	Y/N	Marriage or civil partnership	N
Have we shown due regard for the 9 protected characteristics within the policy/procedure/decision?				Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Are all opportunities to promote equality taken within the policy/procedure/decision?				Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Have we stated how we will monitor the implementation and impact of this policy/decision?				Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	
Date of Screening				25/1/22	