

CHARITY PARTNERSHIPS AND FUNDRAISING POLICY

POLICY STATEMENT

M&S aims to make a positive contribution to society by championing causes that matter to our customers and supporting communities where we operate. In many cases this involves partnering with or fundraising for a charity. To protect the M&S brand, it is critical that charity relationships are managed professionally with the appropriate level of due diligence and adherence to policies.

BACKGROUND

Our customers are charitable and expect us to support good causes. As an organisation we donate money to a range of charities and we also allow colleagues to engage with customers and members of the public to fundraise for chosen causes. The conduct of any charity and business partnership is high profile and reflects on our brand and so it is important that such relationships are professionally managed.

YOUR RESPONSIBILITIES

Ensure you understand and comply with M&S policies noting that M&S does NOT offer charitable support to:

- **Personal appeals or sponsorship of individuals** e.g. funding medical treatment or an overseas trip for someone
- **Political causes**
- **Religious bodies, unless the support being given is non-denominational and non-sectarian.** For example, you can support a church if the money is used to benefit people of any religion
- **Third party fundraising on a charity's behalf.** Money must go directly to the charity for a known cause
- **Advertising for a charity to promote their cause**

M&S supports:

- Organisations that are run not for profit and provide a public benefit, including registered charities, Community Interest Companies (CIC), Charitable Unincorporated Associations, Charitable Incorporated Associations and Charitable Trusts
- We also support limited companies who have a charitable purpose or public benefit

Onboarding:

All new charity partnerships need to be signed off by the central Community Team and processed through appropriate governance before any agreements are made to ensure it fits within the

overall framework of charity partners and so that the appropriate level of due diligence can be carried out.

It's important that M&S see through commitments made. Agreeing to fundraise for a charity but not doing anything causes negative impact for the charity and the M&S brand. Last minute changes to plans can have a disproportionate negative impact on organisations relying on goodwill from volunteers. Money raised for the charity must be donated in the financial year in which it is raised.

- Charity donations over £50 will need line manager approval
- Charity donations over £5k will need approval by any two of CEO, CFO and Corporate Affairs Director (following a recommendation from the Community Team).
- Charity donations over £50k will be notified to the ESG Committee.

Exiting:

Any changes to existing charity partnerships, including broadening of scope and exiting completely, need to be communicated to the central Community Team so that this can be managed in the most appropriate way.

OUR COMMITMENT

- The Company is committed to complying with charity law and fundraising regulations during fundraising and cause related marketing campaigns, including the Charities Act 1992 (as amended by the 2016 Act), the Charity Act 2011, the Fundraising Code of Practice issued by the fundraising regulator and the UK Code of Non-broadcast Advertising, Sales Promotion and Direct Marketing and the UK Code of Broadcast Advertising.
- The Company will take all reasonable steps to ensure colleagues are supported in fulfilling these requirements and will provide both the means for them to do so and guidance on how to comply, as required.
- The Company will ensure its customers are protected, including vulnerable people, from unreasonably intrusive or persistent fundraising

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approaches or undue pressure to donate. You should not:

- be persistent or place pressure on anyone
- intrude on a person's privacy
- take advantage of a mistake, funds must be returned if this happens
- take advantage of anyone that seems vulnerable

→ The Company is committed to ensuring it delivers on our Safeguarding Standards in our charity partnerships and fundraising to safeguard the welfare of children and adults.

COMPLIANCE

- This policy applies to all M&S colleagues worldwide. We also expect our Franchise business partners to adhere to these standards for any customer fundraising.
- This does not apply to colleagues carrying out fundraising backstage or in their own time.
- This does not apply to surplus food or clothing donations.
- The central Community Team are responsible for monitoring compliance. A charity relationship can be terminated if it is found to

be in breach of our policy or fails due diligence checks.

- Quarterly Reporting will be put in place on all charity spend over £50
- The Community Framework will be reviewed on an annual basis

REPORTING AND QUERIES

If you have any questions or concerns about our charity partnerships, please contact the Community Team:

Jo Daniels – Jo.Daniels@marks-and-spencer.com

Nick Mortimer – Nicholas.x.Mortimer@marks-and-spencer.com

For more information on activities involving our charity partners please see guidance on the Plan A Hub:

- Charity partnership management
- Fundraising, including fundraising regulations
- Cause related marketing
- Safeguarding
- Volunteering

FURTHER INFORMATION

Policy Owner	Victoria McKenzie-Gould, Corporate Affairs Director
Compliance Lead	Jo Daniels - Community Team
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