



Iontaobhas Oideachasúil
Educational Trust

Policy Statement on Russia-Ukraine Crisis

June 2022

Introduction

The invasion of Ukraine by Russia is a shocking event, which has upturned the lives of many millions of people in Ukraine, and challenges the sense of peace and security in which many Europeans have lived for two generations. It seems probable that the repercussions will impact widely across society, including charities, responding to these events as they unfold.

Following the introduction of economic sanctions by the European Commission in February 2022 against the Russian State and certain Russian entities and Individuals, the Risk, Compliance & Governance Committee (the Committee) has considered the implications and risks for DCU Educational Trust (DCUET).

The Committee recommends that the Board adopts the following range of measures in order to minimise the financial and reputational risk that could result from the Russia/Ukraine crisis.

Investments

DCU Educational Trust should not hold any investments within or linked to Russia, Russian Individuals or Russian Sphere countries.

DCUET should obtain assurances from its fund investment managers on the current level of Russian investments held and instruct the investment managers to dispose or write down any relevant holdings with immediate effect. DCUET should, in addition, instruct the investment managers not to take any Russian investment positions until advised otherwise.

Existing Donors

DCU Educational Trust should conduct a review of existing donors in order to determine if there are any Russian (Sphere) registered corporate donors or Russian (Sphere) individual donors.

DCUET should not accept any further donations from, or conduct any additional fundraising activities with, identified parties.

Further, DCUET should attempt to identify donors with known associations with Russia (Sphere). Any identified donors should be advised to the Committee for further consideration of the implications of such association.



New and Anonymous donations, Gifts in Kind

DCU Educational Trust should not engage in any new fundraising activities with Russian (Sphere) registered corporate donors or Russian (Sphere) individuals. Further, DCUET should refuse to accept any new donations from such donors, including any Gifts in Kind.

With regard to anonymous donations, every effort should be made to identify the source of the donation.

Ongoing Process

DCU Educational Trust will continue to conduct periodic reviews of investments and donor pool in order to remain aligned to evolving sanctions lists maintain by the European Union.