

# Givers Legacy Foundation Contribution Policy

## Introduction

Givers Legacy Foundation ("GLF") exists to help families build their legacy through charitable giving. This policy governs the acceptance, processing, and stewardship of contributions in compliance with U.S. charity law (notably the U.S. Civil Code and U.S. anti-money laundering regulations), while ensuring operational alignment with international best practices and ethical standards.

GLF accepts gifts for the advancement of its charitable objectives and those of its charitable partners. All contributions are received with an expectation of charitable intent and will be administered in accordance with applicable laws, regulations, and GLF's governing instruments.

## Eligible Givers and Contribution Responsibility



### Eligible Givers

Gifts may be made by any legal person or entity, including:

- Individuals
- For-profit and non-profit corporations
- Foundations and donor-advised funds
- Partnerships (general and limited)
- Trusts and estates
- Legal entities such as Limited Liability Companies (LLCs), Corporations (Inc.), and similar corporate forms

## Donor Responsibilities

Givers are responsible for:

- Valuation of the gift under the relevant jurisdictional laws
- Ensuring the gift aligns with their legal and tax obligations
- Notifying GLF if contributing testamentary assets, restricted assets, or complex non-liquid gifts
- Obtaining and retaining any required third-party valuations or appraisals for cryptocurrency and complex asset gifts (e.g., business interests, real estate, privately held securities) that may be needed for the donor's own tax reporting or compliance requirements.

GLF does not generally accept contributions from non-beneficiary retirement accounts/qualified plans unless special provisions are in place.

## Types of Gifts Accepted

GLF may accept the following types of gifts, subject to due diligence and approval:

### Cash Gifts

Accepted in multiple currencies via:

- Bank wire
- EFT/ACH
- Credit card
- Money order
- Check

### Publicly Traded Securities

- Must be received into GLF's brokerage account in good order
- Typically liquidated the next business day
- Thinly traded, restricted, or illiquid securities require pre-approval and may involve longer settlement

### Default Policy on Liquidation

Unless prior arrangements have been specifically requested by the donor and agreed to in writing by GLF, all marketable securities will be liquidated immediately upon receipt, and the resulting cash proceed, net of transaction assessments, will be allocated to the donor-recommended fund.

## Cryptocurrency

- Subject to a 1% processing assessment
- USD 500 equivalent minimum per transaction
- Only pre-approved coins and wallets are accepted
- Due diligence includes source of funds verification may be requested, especially for contributions exceeding USD 20,000 or when the donor is unknown to GLF

## Asset-Based, Non-Liquid, and Complex Gifts

Examples include:

- Privately held corporate stock
- Restricted or non-public securities
- Real estate (developed/undeveloped)
- Art, collectibles, tangible personal property
- Royalties, copyrights, patents
- Life insurance (all forms)
- Loan notes or receivables

All non-liquid gifts require internal approval through a defined risk and impact evaluation process, following the U.S. Code of Obligations and stewardship principles.

Gifts involving non-liquid or complex assets, including business interests, closely held entities, and real estate, may be accepted by GLF on a case-by-case basis.

## Default Policy on Liquidation

Unless otherwise agreed in advance with GLF, cryptocurrency gifts will be liquidated promptly upon receipt. The net proceeds will be allocated to the donor's recommended fund.

## Market Liquidity Considerations

In cases where the cryptocurrency, security or other asset is thinly traded, GLF reserves the right to delay liquidation or execute the transaction in tranches in order to prevent market disruption. The timing and method of liquidation will be at GLF's sole discretion, taking into account prevailing market conditions, volatility, and liquidity risk.



Prior to acceptance, these gifts must undergo a formal **Ministry Acceptance Evaluation**, which determines:

- Legal structure and transferability
- Reputational or regulatory risk
- Fair market valuation and liquidity
- Tax implications for both GLF and the donor
- Projected management burden and administrative costs

Acceptance of these assets is subject to written agreement between GLF and the donor and may involve cost recovery arrangements or the use of special-purpose entities. GLF reserves the right to delay liquidation or execute transactions in a manner that avoids market disruption for thinly traded assets.

GLF reserves the right to decline any gift that, in its sole discretion, presents unacceptable legal, financial, or ethical risks.

## Testamentary and Deferred Gifts

GLF accepts bequests and estate-related gifts via:

- Wills and trusts
- Bank and brokerage account beneficiary designation, including retirement accounts (if permitted)
- Life insurance policies
- Payable/transfer-on-death designations
- Charitable gift annuities or remainder trusts
- Other asset-based gifts

All testamentary gifts should use the following designation language:

*“To Givers Legacy Foundation, a charitable, 501(c)(3), non-profit corporation organized under the laws of the United States, subject to its governing instruments, policies, and procedures, as amended from time to time.”*

GLF will only initiate grantmaking after the estate settles and when it is reasonably confident there is no material risk or pending litigation.

# Gift Refusal, Return, or Suspension

GLF may refuse, return, or suspend a gift under the following conditions:

- Known or suspected illegal origin (fraud, bribery, terrorism, money laundering)
- Associated reputational risk or ethical concerns
- Gift conditions conflict with GLF's charitable objectives or public benefit purpose
- Asset may be connected to known or latent liabilities
- Conflicts with regulatory or donor-advised fund restrictions (e.g., impermissible private benefit or excessive donor control)



## Due Diligence and Regulatory Compliance

### Anti-Money Laundering (AML)

In accordance with U.S. AML law and FINMA guidelines, GLF applies a risk-based KYC approach, particularly for:

- One-time large donations (>USD 20,000), especially with new givers with no prior relationship
- Politically Exposed Persons (PEPs)
- Gifts from high-risk jurisdictions or known terrorist hotspots
- Donations from a single donor that exceed USD 100,000 in a calendar year

GLF's AML/KYC Policy includes the following measures:

✓ **Client Identification and Verification**

Donors holding Foundation Funds, large amount donors (LADs), and charity leaders (CLs) must provide identification documentation including passport, government-issued ID, or legal incorporation documents.

✓ **Sanctions and PEP Screening**

Clients are screened against sanctions and PEP lists through Dun & Bradstreet Restricted Party Screening.

✓ **Ongoing Due Diligence**

GLF monitors transactions regularly to detect and investigate unusual patterns. Clients may be asked to re-verify identity or provide additional documentation.

✓ **Enhanced Due Diligence (EDD)**

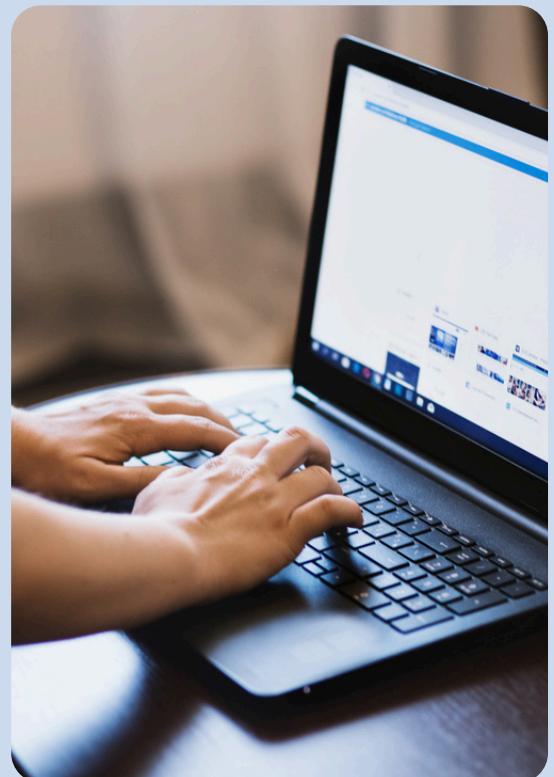
High-risk clients, including PEPs, complex organizational structures, or jurisdictions with poor transparency, will be subject to EDD involving deeper vetting, documentation, including Source of Funds declaration, and potential field investigation.

✓ **Beneficial Ownership**

GLF identifies and verifies the natural persons who ultimately own or control more than 25% of an entity involved in a transaction.

✓ **Recordkeeping**

All AML/KYC documentation and verification activities are retained for a minimum of five years post-fund closure.



Failure to meet KYC verification requirements may result in delayed fund activation, suspended disbursements, or rejected contributions. GLF retains the right to decline organizational relationships where it cannot establish a reasonable belief in the client's identity or funding legitimacy.

## Recordkeeping

GLF maintains documentation for all gifts, including:

- Receipts for gifts over USD 250
- Detailed descriptions for asset-based gifts
- Signed Donation Agreements or other Donation Contracts (where applicable)
- Donor communications and instructions



## Receipting and Acknowledgement

### Contribution Clearing and Posting

Contributions are posted to donor-recommended funds following the successful clearing of the transaction:

#### ✓ Wire Transfers

Posted within 3 business days of funds being received by GLF's bank

#### ✓ Credit Card Contributions

Posted when cleared by the processing company, typically within 3 business days

#### ✓ ACH Transfers

Subject to a 7-calendar day clearing hold before being posted

GLF reserves the right to place a discretionary hold on any contribution when additional due diligence or verification is required, or when fund instructions are incomplete.

GLF will issue a formal receipt for each eligible contribution in accordance with U.S. regulations and international best practices.

#### ✓ Money Order

Subject to a 7 calendar-day clearing hold before being posted and depending on the issuing institution and GLF's bank policies

#### ✓ Checks

Subject to a 7-calendar day clearing hold before being posted; Checks under USD 3,000 may be cleared sooner

Receipts include:

- Date of receipt by GLF
- Description of the asset (cash, securities, crypto, etc.)
- Donor name (as per instrument of transfer)
- Amount (for cash gifts) or declared value (for non-cash gifts, as substantiated by the donor)

## Contributions Without Recommendations

If a contribution is received by GLF without a donor recommendation or designation, the contribution will be allocated to the GLF Unknown Giver Fund. GLF will make best efforts to identify and contact the donor using any available information or transactional metadata.

If the donor provides instructions, the funds will be allocated accordingly. If no contact is established or instructions received within a twelve-month period, the contribution will be transferred to GLF's operational accounts and used at the discretion of the Foundation to support charitable initiatives in accordance with its public benefit objectives and applicable law.

## Cost Recovery and Fund Assessments

Applicable administrative costs may be assessed based on:

- Fund size and balance
- Asset type and complexity
- Investment management requirements
- Legal, tax, and liquidation costs

GLF will recover third-party costs from gifted assets where possible. Exceptions or custom arrangements may be approved by leadership.

## Important Note on Receipt Dates

Receipts will be dated **only on the day the gift is received into GLF's account**, not on the date the donor initiates the transaction. For example, if a donor initiates a stock transfer on **December 31**, but the shares are not received in GLF's brokerage account until **January 4**, the receipt will reflect **January 4** as the official contribution date.

This timing distinction is particularly relevant for donors intending to claim charitable deductions based on calendar-year giving. Donors are advised to initiate contributions well in advance of year-end deadlines if they wish to ensure receipting within a given tax year.

## Receipts for Smaller Gifts

While GLF generally provides receipts for gifts over USD 250, if a donor has supplied a valid email address, GLF will also issue receipts for contributions below this threshold electronically.

GLF is not responsible for processing delays caused by intermediary banks, custodians, or market holidays, and cannot retroactively alter gift receipt dates to accommodate tax planning purposes.



The SVP of Operations & Philanthropy shall ensure adherence and will report material deviations, breaches, or incidents.

## Modifications and Oversight

This policy may be amended by the Board of Trustees of Givers Legacy Foundation as needed to:

- Align with updated U.S. legal standards
- Reflect evolving risk landscapes
- Maintain harmonization across the broader GLF network

*This Contributions Policy extends to any present or future subsidiary, affiliate, or supporting organization of Givers Legacy Foundation (GLF). All such entities shall adhere to this policy in order to maintain consistency, accountability, and compliance with applicable U.S. law and IRS regulations.*

*Givers Legacy Foundation (GLF) is recognized as a tax-exempt public charity under Section 501(c) (3) of the Internal Revenue Code. Contributions to GLF are deductible for U.S. federal income tax purposes to the full extent permitted by law. Donors should consult their tax advisors regarding the deductibility of their contributions in light of their individual circumstances. GLF will provide substantiation of contributions in accordance with IRS requirements, including contemporaneous written acknowledgments for gifts of \$250 or more.*



**Prepared by:** Tricia Collins, SVP, Operations & Philanthropy

**Review cycle:** Annually or as required by regulatory change

**Last Reviewed:** August 2025