

## SUSTAINABLE ENVIRONMENTAL ADVOCACY AND DEVELOPMENT

# Gift Acceptance Policy

### *Board Governance Policy*

|                                     |       |
|-------------------------------------|-------|
| <b>Adopted by Board of Trustees</b> | _____ |
| <b>Effective Date</b>               | _____ |
| <b>Next Review</b>                  | _____ |

## 1. Purpose

Sustainable Environmental Advocacy and Development (SEAD) welcomes charitable gifts that advance its mission while protecting the organization, its donors, and the public interest. This policy provides a consistent framework for reviewing, accepting, acknowledging, administering, and, when necessary, declining gifts.

## 2. Guiding Principles

- SEAD will accept gifts that are consistent with its charitable mission, governing documents, legal obligations, ethical standards, and organizational capacity.
- SEAD will respect lawful donor intent while retaining appropriate control over the use and administration of charitable assets.
- No trustee, officer, employee, volunteer, or representative may provide legal, tax, or financial advice to a donor on behalf of SEAD.
- Donors should be encouraged to consult their own independent legal, tax, and financial advisers regarding significant or complex gifts.
- SEAD will not knowingly accept a gift that would jeopardize its tax-exempt purposes, expose it to unreasonable liability, create excessive administrative burden, or damage its integrity or reputation.

## 3. Authority to Accept Gifts

Routine, unrestricted cash gifts and readily marketable securities may be accepted by authorized staff or officers in the ordinary course of business. Gifts that are restricted, unusual, non-cash, illiquid, potentially burdensome, or associated with material conditions must be reviewed by the President/Executive Director, Treasurer, Board Chair, or other person designated by the Board. The Board of Trustees retains final authority over gifts presenting significant legal, financial, ethical, reputational, or mission-related concerns.

## 4. Generally Acceptable Gifts

- Cash, checks, electronic transfers, and online contributions.
- Publicly traded securities that can be readily valued and sold.
- Bequests and beneficiary designations from wills, trusts, retirement plans, life-insurance policies, and similar arrangements.
- Grants from foundations, corporations, government entities, and other charitable sources, subject to applicable terms.
- In-kind goods or services that SEAD can reasonably use in furtherance of its mission.
- Other property or interests approved after appropriate review.

## 5. Restricted and Designated Gifts

SEAD may accept gifts restricted to a particular program, project, geographic area, or charitable purpose when the restriction is consistent with SEAD's mission and reasonably capable of administration. SEAD will not accept restrictions that are unlawful, discriminatory, impracticable, inconsistent with donor intent requirements, or so burdensome that they materially interfere with effective program administration.

If circumstances later make a restriction impossible, impracticable, unlawful, or wasteful, SEAD will seek an appropriate modification consistent with applicable law and the donor's charitable intent.

## **6. Gifts Requiring Special Review**

- Real estate, including land, buildings, mineral rights, or partial interests.
- Closely held business interests, partnership or limited-liability-company interests, and privately held securities.
- Cryptocurrency or other digital assets.
- Vehicles, boats, equipment, artwork, collectibles, intellectual property, or other tangible personal property of material value.
- Life-insurance policies for which SEAD would become owner or beneficiary.
- Gifts involving debt, liens, environmental risk, carrying costs, unrelated business income, contractual obligations, or other potential liabilities.
- Gifts requiring SEAD to employ a particular person, purchase from a particular vendor, endorse a commercial product, or provide an impermissible private benefit.
- Any gift that may create a conflict of interest or significant reputational concern.

## **7. Due Diligence**

Before accepting a gift requiring special review, SEAD may obtain information reasonably necessary to evaluate ownership, value, restrictions, liabilities, environmental conditions, marketability, carrying costs, tax implications to SEAD, compliance requirements, and consistency with SEAD's mission. SEAD may require an independent appraisal, title information, environmental assessment, legal review, or other professional advice at the donor's expense when appropriate.

## **8. Valuation and Appraisals**

SEAD will record gifts in accordance with applicable accounting standards and legal requirements. Except where required for SEAD's own accounting or reporting purposes, SEAD will not assign or confirm a donor's tax-deduction value for non-cash property. The donor is responsible for obtaining any qualified appraisal and completing donor tax forms required by law. SEAD may provide factual information needed to complete its portion of an applicable form.

## **9. Gift Acknowledgments**

SEAD will provide timely written acknowledgments for charitable contributions when required or appropriate. Acknowledgments will describe non-cash property without assigning a tax value and will state whether SEAD provided goods or services in exchange for the contribution when required by law.

## **10. Donor Privacy and Confidentiality**

SEAD will protect donor information consistent with applicable law, its Privacy Policy, contractual obligations, and legitimate organizational needs. Donor names or gift information will not be publicly disclosed when anonymity has been appropriately requested, except when disclosure is required by law, audit, grant, regulatory, or other legal obligations.

## **11. Naming and Recognition Opportunities**

Naming rights, sponsorship recognition, commemorative opportunities, and other significant public recognition must be documented and approved at an appropriate level. SEAD may decline or discontinue recognition when continued association would materially conflict with SEAD's mission, values, legal obligations, or reputation, subject to any binding agreement and applicable law.

## **12. Donor Benefits and Quid Pro Quo Contributions**

When a donor receives goods or services in connection with a contribution, SEAD will comply with applicable disclosure and substantiation requirements. Fundraising staff and volunteers must accurately describe the

charitable and non-charitable portions of transactions and may not promise tax treatment that has not been independently established.

**13. Planned and Deferred Gifts**

SEAD may accept bequests, beneficiary designations, charitable trusts, charitable gift annuities, or other planned gifts only when the arrangement is legally permissible and administratively appropriate. SEAD may obtain legal or financial review before accepting an obligation to serve as trustee, custodian, annuity issuer, or other fiduciary.

**14. Refusal or Return of Gifts**

SEAD may decline a gift when acceptance would be inconsistent with this policy or otherwise not in SEAD's best interests. Once a completed charitable gift has been accepted, it generally will not be returned except when required by law, necessary to correct an error, or approved by the Board or authorized leadership after appropriate legal and financial review.

**15. Conflicts of Interest and Ethical Fundraising**

Persons involved in soliciting, reviewing, or accepting gifts must disclose actual or potential conflicts of interest and comply with SEAD's Conflict of Interest Policy. No person may receive undisclosed personal compensation, commissions, finder's fees, or other private benefits based on the amount or value of a charitable contribution.

**16. Gift Administration and Restricted-Fund Accounting**

Accepted gifts must be deposited, safeguarded, recorded, and used in accordance with SEAD's Financial Controls Policy. Restricted gifts must be tracked in a manner that demonstrates compliance with donor restrictions. Documentation relating to gifts must be retained under SEAD's Document Retention and Destruction Policy.

**17. Policy Administration and Review**

The Board of Trustees may delegate day-to-day administration of this policy while retaining fiduciary oversight. Questions concerning unusual gifts should be elevated before acceptance. The Board will review this policy periodically and revise it as SEAD's programs, fundraising practices, legal obligations, and organizational capacity evolve.

**Acknowledgment**

I acknowledge that I have received, read, and understand SEAD's Gift Acceptance Policy and agree to comply with its requirements.

|                  |       |
|------------------|-------|
| <b>Name</b>      | _____ |
| <b>Signature</b> | _____ |
| <b>Date</b>      | _____ |