

# International Generosity Foundation Contribution Policy

## Introduction

International Generosity Foundation ("IGF") exists to mobilize global generosity from the United States to the rest of the world. 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.

IGF 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 IGF'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 GmbHs, SRLs, and SAs



## 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 IGF 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.



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

## Types of Gifts Accepted

IGF 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 IGF'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 IGF, 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

IGF collaborates with various Network Members to facilitate contributions made in cryptocurrency. Donors choosing to contribute in this form acknowledge that their donation will be processed through the applicable Network Member, and therefore, the donation will be subject to the rules, terms, and conditions of that Network Member.

## 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

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 IGF and the donor
- Projected management burden and administrative costs

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 IGF on a case-by-case basis.



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

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

## Testamentary and Deferred Gifts

IGF 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

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

## Market Liquidity Considerations

In cases where the cryptocurrency, security or other asset is thinly traded, IGF 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 IGF's sole discretion, taking into account prevailing market conditions, volatility, and liquidity risk.



All testamentary gifts should use the following designation language:

*“To International Generosity 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.”*

# Gift Refusal, Return, or Suspension

IGF 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 IGF'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, IGF 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**

IGF 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**

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

## **Recordkeeping**

IGF 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

### ✓ **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. IGF retains the right to decline organizational relationships where it cannot establish a reasonable belief in the client's identity or funding legitimacy.



## **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 IGF'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

## ✓ Money Order

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

## ✓ Checks

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

IGF 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.

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

Receipts include:

- Date of receipt by IGF
- 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)

## Important Note on Receipt Dates

Receipts will be dated **only on the day the gift is received into IGF'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 IGF'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 IGF generally provides receipts for gifts over USD 250, if a donor has supplied a valid email address, IGF will also issue receipts for contributions below this threshold electronically.

IGF 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.

## Contributions Without Recommendations

If a contribution is received by IGF without a donor recommendation or designation, the contribution will be allocated to the IGF Unknown Giver Fund. IGF 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 IGF'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

## Modifications and Oversight

This policy may be amended by the Board of Trustees of International Generosity Foundation as needed to:

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

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



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



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

*International Generosity Foundation (IGF) is recognized as a tax-exempt public charity under Section 501(c)(3) of the Internal Revenue Code. Contributions to IGF 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. IGF 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  
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