



## **Gift Giving Policy**

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The purpose of this policy is to govern the acceptance by Project Beaver of all or specific types of gifts, and to provide guidance to prospective donors. The goal is to ensure the organization does not accept any gift that may create real or perceived risks or conflicts to the organization. This policy will help to:

- Improve our internal decision-making process and standardize communication around gift/grant acceptance.
- Ensure Project Beaver accepts only donations and grants that are mission and values aligned and that provide a net benefit to the organization.
- Create clarity and opportunity around possible new values-aligned sources of unrestricted funding for Project Beaver.

## **Accepted Giving Sources**

Cash, Check, Credit Card, Direct ACH Debit, Gifts of Stock, Cryptocurrency, Bequests, Estate Gifts, Annuities, Donor Advised Funds, Matching and In-kind donations. Note: Gifts of Stock and Cryptocurrency are converted to cash within 5-7 business days.

## **Use of Legal Counsel:**

Project Beaver will seek the advice of legal counsel in matters relating to acceptance of gifts when appropriate. Review by counsel is recommended for:

- Gifts of securities that are subject to restrictions or buy-sell agreements.
- Documents naming Project Beaver as trustee or requiring it to act in any fiduciary capacity.

- Gifts requiring Project Beaver to assume financial or other obligations.
- Transactions with potential conflicts of interest.
- Gifts of property that may be subject to environmental or other regulatory restrictions.

## **Restrictions on Gifts**

Project Beaver will not accept gifts that:

- Would result in Project Beaver violating its corporate charter.
- Would result in Project Beaver losing its status as an IRS § 501(c)(3) not-for-profit organization.
- Are too difficult or too expensive to administer in relation to their value.
- Would result in any unacceptable consequences for the organization.
- Are for purposes outside Project Beaver's mission.

Decisions on the restrictive nature of a gift, and its acceptance or refusal, shall be made by the Executive Committee, in consultation with the Executive Director.

## **Individual Giving**

Project Beaver accepts donations from all individual donors but recognizes individuals can represent corporate interests and will evaluate gifts from any individual perceived as trying to influence Project Beaver's values, approach and/or campaigns. Project Beaver accepts individual pooled donations through crowdfunding platforms (e.g. GoFundMe). Project Beaver accepts donations from individuals' securities that can be sold upon receipt.

## **Donor Advised Funds**

Project Beaver accepts donations from donors via Donor Advised Funds (DAFs). The DAF is recognized as the official donor, rather than the original supporter, though Project Beaver's relationship is with the individual, not with the financial entity/DAF sending the funds.

If a donor has certain intentions for their contributions, Project Beaver wants to ensure those intentions are followed. Therefore, the Board can elect to place restrictions on the funds to ensure the donor's intentions are met, rather than keeping the funds unrestricted because they came from a DAF.

All donations over \$10,000 received through DAFs will be presented to the Board for review at their next possible meeting, providing documentation from the supporter in addition to payment support from the DAF. If the Board provides a restriction to a donation, it will follow the same procedures as income with donor restrictions.

## **Workplace Giving**

Project Beaver accepts workplace donations in the form of matching gifts across the board, even from corporations that act in ways that don't align with our mission, because these donations represent an individual's contribution, regardless of their origin. These donations are always treated as individual contributions.

## **Real Estate**

No gift of real estate will be accepted without prior approval of the Board of Directors based on advice from Project Beaver's legal counsel and a qualified independent appraisal.

Criteria for acceptance of the property shall include:

- The property is expected to be marketable within six months.
- Any restrictions, reservations, easements, or other limitations associated with the property are known and minimal.
- Any carrying costs, which may include insurance, property taxes, mortgages, or notes, associated with the property are known and deemed manageable.
- The appraisal/survey reflects that that property is sound and in acceptable condition for resale.
- The cost of obtaining necessary documents and fees associated with risk assessment and remediation studies; property taxes; maintenance,

management and insurance appraisals; title reports and legal fees will be borne by the donor.

## **Tangible Personal Property**

Jewelry, artwork, collections, and other personal property shall not be accepted unless these provide added benefit to the organization's work and mission (e.g. live traps for beavers) or there is reason to believe the property can be quickly sold. No personal property shall be accepted that obligates Project Beaver to ownership of it in perpetuity. No perishable property or property which will require special facilities or security to properly safeguard it will be accepted without prior written approval of the Board of Directors. Only the Board of Directors or the person(s) authorized by them may represent to a donor that property will or will not be held by Project Beaver for a specific period of time, or for purposes related to a specific period of time, or for purposes related to its 501(c)(3) purposes.

If there is reason to believe particular personal property has a value of \$1,000.00 or more, it may be accepted only after receipt and review of an appraisal qualified under the terms of the IRS code governing gifts of this type property. Serious valuation problems exist with respect to a number of categories of personal property, especially art and other "collectibles." If a gift of personal property is to be considered based on the aforementioned criteria, the donor will be asked to obtain a bona fide appraisal or documentation of fair market value and ease of sale.

## **Gifts In-Kind**

Project Beaver accepts in-kind donations made by individuals if they provide added benefit to the organization's work and mission. Project Beaver will provide an official acknowledgement to donors for their accepted gifts, but in accordance with IRS regulations, the organization cannot provide gift valuation and the donor is responsible for determining the value of the gift. If an in-kind donation does not further the organization's goals, Project Beaver reserves the right to decline the gift and/or send the donation and donor contact information to another charitable organization.

Project Beaver will accept in-kind corporate donations that align with the above criteria if the donation is directed through a foundation that is a separate legal entity from the associated corporation (see private foundations guidelines below).

## **Private Foundations**

Project Beaver accepts gifts/grants from most private foundations. This includes foundations whose investment portfolios are from historically corporate earnings, provided the foundation is a separate legal entity from the associated corporation (e.g. Ford Foundation vs. Ford Motor Company). When considering accepting support from a foundation, Project Beaver's Board and Executive leadership will use the following criteria to determine alignment:

- The foundation has a board that makes grantmaking decisions, separate from corporate-affiliated board.
- The foundation has its own leadership and staff.
- The foundation does not require the use of Project Beaver's logo, work, or other marketing benefits for the affiliated corporation.
- Project Beaver's association with the foundation's brand will not have a negative impact on our reputation.
- The foundation is registered as a 990-PF if US-based, or country equivalent.

## **Government Agencies**

Project Beaver will accept funding from US local, state or federal government agencies. Funding from other government agencies or networks whose policies and objectives do not present a real or perceived conflict of interest with Project Beaver campaigns will be considered on a case-by-case basis.

## **Businesses**

Project Beaver will not accept donations of \$5,000 or above from any for-profit company that does not pass the initial screening. When considering accepting support from a for-profit company, Project Beaver's Board and Executive

leadership will use the following criteria to determine alignment: The screening has been developed with Project Beaver staff and board input with the goal of leaving room for only aligned for-profit companies to support Project Beaver. Screening criteria include the following:

- Business/Company does not support anti-environmental or human-rights violating business models and practices.
- Business/Company does not engage in unethical or illegal labor practices.

## **Acknowledgement of Support Guidelines**

The Project Beaver brand and logo are not for sale and we strive to ensure that no individual, foundation, company or business makes a donation to Project Beaver in order to gain organizational endorsement or a marketing tool. If an individual, foundation, company or business chooses to publicly acknowledge their support of Project Beaver, it must be approved by Project Beaver Board and Executive leadership based on the criteria listed above and they must use logo and language provided by Project Beaver. Any business seeking to list Project Beaver publicly must pass the initial screening process for gift/grant acceptance, regardless of the donation amount.

Project Beaver only publicly acknowledges donors in its annual report and with relevant event sponsorship benefits. Supporters of Project Beaver never receive any sort of endorsement.