



Gift Acceptance & AML Policy

Effective March 1, 2026

Introduction

The SDG Impact Fund is an IRS recognized 501(c)(3), not-for-profit entity organized under the laws of the State of Georgia (hereinafter referred to as the “Fund”). The Fund encourages the solicitation and acceptance of gifts that will help the Fund in the furtherance of its mission to foster private financial support for global charitable causes. This Gift Acceptance Policy shall apply to all gifts received by the Fund for any of its programs or services. The Fund retains full discretion over all gifts and grantmaking decisions in accordance with IRS regulations governing public charities.

Purpose of Policy

The Board of Directors of the Fund and its staff solicit current and deferred gifts from individuals, corporations, Funds and other private entities to secure the financial growth to fulfill the mission of the Fund. The purpose of these policies and guidelines is to define the practices and policies governing the acceptance of gifts by the Fund and to provide guidance to prospective donors and their advisors when making gifts to the Fund, so as to facilitate the gift-giving process.

General Policy

The Fund will accept unrestricted gifts and gifts for specific programs and purposes, provided that such gifts are consistent with its stated mission and do not violate the terms of this policy. Gifts received by the Fund must not inhibit it from seeking similar or different gifts from other donors. No gift can be received which limits, beyond a general definition of subject area, the global reach of the Fund. The Fund will not accept any gift that provides a direct or indirect personal benefit to the donor or any related party, beyond benefits permitted under applicable law.

Gift Acceptance Committee

It is recognized that certain gifts, including but not limited to those involving unusual funding arrangements, should not be routinely processed, but should be reviewed by the Gift Acceptance Committee, which receives its authority from the Fund Board of Directors, as described within this policy statement. All final decisions on the restrictive nature of a gift, and its acceptance or refusal, shall be made by the Gift Acceptance Committee of the Fund.

The Gift Acceptance Committee shall consist of:

- The Chairman of the Board of Directors
- A member of the Board of Directors
- The Chief Financial Officer

The Chairman of the Board of Directors shall serve as the Chairman of the Gift Acceptance Committee. The Chair shall consult with the CFO prior to any meeting of the Gift Acceptance Committee. The Chair may also consult with any other officer, director or staff member of the Fund whom the Chair believes appropriate. The Gift Acceptance Committee shall typically meet by telephone conference or at the call of the Chair, as may be necessary. Three (3) members of the Gift Acceptance Committee constitute a quorum.

The types of gifts which will be referred to the Gift Acceptance Committee include, but are not limited to, the following:

- Gifts requiring unusual funding arrangements or other commitments.
- Gifts of intangible or unusual personal property, including vessels or boats.
- Gifts of non-publicly traded securities.
- Gifts of partnership interests and other non-traditional investments.
- Gifts of real estate as defined further in this policy statement.
- Certain annuity contracts and charitable annuity trusts as defined further in this policy statement.
- Gifts with special restrictions that may be difficult or costly to administer.
- Any gifts that are exceptions to existing guidelines or which fall outside the definition of acceptable gifts as defined by this policy statement.

All decisions of the Gift Acceptance Committee shall be documented in writing and maintained as part of the Fund's official records.

Compliance with Uniform Affiliation Agreement

Pursuant to the terms of the Uniform Affiliation Agreement executed by the Fund and any Donor, the acceptance of certain gifts may require prior approval of the Gift Acceptance Committee.

Donations requiring prior approval by the Gift Acceptance Committee include donations that impose certain types of obligations on the Fund, or require actions or approvals by the Fund which have not previously been taken or given. Donations of this type would include, but would not be limited to: a proposed gift made to fund a program or capital project not previously approved by the Board of Directors; gifts involving naming opportunities not previously approved in accordance with Fund policies and procedures; and, gifts of land that include proposed conditions requiring that the Fund occupy the land or conduct certain activities on the land contrary to the Funds own policies or procedures. Prior to approval by the Board of Directors, such donations may be "conditionally" accepted by the Fund only pursuant to a written agreement which contains a provision indicating that acceptance is conditioned on the acceptance of the conditions or obligations by the Board of Directors in accordance with applicable Fund policies and procedures. Until any conditions or obligations

imposed on the Fund are accepted in accordance with applicable policies and procedures, the donation may not be publicized or disclosed to third parties. To avoid possible damage to a donor relationship that could result from publicity associated with the refusal to accept a proposed donation, notice provided by the Fund to any employee or contractor should not refer to the Donor by name.

A second category of donations requiring the Board of Directors approval involves the donation of land. Donations of land that are intended to be retained by the Fund (rather than land that is accepted for resale within a reasonable period of time) and donations of land or similar interests (servitudes or leases) intended for lease or occupancy by the Fund require the Board of Directors approval. Prior to approval by the Board of Directors, such donations may be “conditionally” accepted by the Fund only pursuant to a written agreement which contains a provision indicating that acceptance is conditioned on approval by the Board of Directors in accordance with the terms of an agreement.

Donor Relations

The interests of prospective donors shall be a primary consideration with respect to any gift to the Fund. Pressure techniques are not acceptable, and no program, agreement, trust or contract shall be presented which would benefit the Fund or its beneficiary units at the expense of the donors’ best interests and charitable motivations. All prospective donors will be advised to consult their own legal or financial counsel regarding the tax implications of a gift and matters related to estate planning.

All information obtained from or about donors or prospects shall be held in strictest confidence by the Fund and the Board of Directors. The Fund will respect donor wishes in regard to publication of information or other forms of recognition.

AML Guides

Generally accepted IRC Code guidelines recommend that all charities, including nonprofits and grant makers, conduct a basic vetting of donors and recipients, by:

- Consulting publicly available information to ensure that key employees, board members or other senior management of the recipient are not suspected of activity relating to terrorism;
- Requiring that recipients certify that they do not employ, transact with, provide services to or otherwise deal with any individuals, entities or groups that are sanctioned by OFAC, or with any persons known to the recipient to support terrorism;
- Donor and Donor Advisors must submit a completed and sign Grant Recommendation Form for final Board approval before any grant is made.

- The Board of Directors reserve the right to reject any and all gifts, and/or grant recommendations at their sole discretion.

A. “Know Your Donor” (KYD)

The Fund may conduct Know Your Donor (KYD) procedures, including identity verification and source-of-funds review, particularly for large or non-cash contributions.

B. Source of Funds / Source of Wealth

The Fund reserves the right to request information regarding the source of funds or source of wealth associated with any contribution.

C. Enhanced Due Diligence

Enhanced due diligence may be conducted for high-risk jurisdictions, complex asset contributions, or large transactions.

D. Ongoing Monitoring

The Fund may conduct ongoing monitoring of donor activity and grant distributions to ensure continued compliance with applicable laws and regulations.

E. Refusal / Exit Rights

The Fund reserves the right to decline, return, or unwind any transaction if concerns arise regarding legal, regulatory, or reputational risk.

Current and Deferred Giving

Current Giving — A current gift involves the transfer of money or property by a donor to a qualified charitable institution, such as the Fund, without receipt of consideration or economic benefit by the donor in return for making the gift. Such gifts are placed at the immediate disposal of the Fund and may be either restricted or unrestricted in purpose. Most types of property may be donated to the Fund as current gifts, although gifts other than cash and publicly-traded securities must comply with the provisions and guidelines contained within this policy statement. Often the amount of a gift of cash or securities can be increased through a designed matching program, or fundraising campaign. The Fund aggressively pursues such opportunities through active communication with donors and beneficiary units.

Deferred Giving — A deferred gift involves the irrevocable transfer of an asset to a qualified charitable organization, such as the Fund. The donor generally retains either an income stream or the remainder interest. Current tax laws allow several planning alternatives for deferred gifts, although a donor will not receive charitable tax deductions unless the program selected complies with applicable requirements established by the Internal Revenue Code, or other laws or regulations which govern certain types of deferred gifts. The Fund will urge all prospective donors to seek the assistance of personal legal and financial advisors in matters relating to their gifts and the resulting tax and estate planning consequences.

The Fund's deferred giving program is referred to as "Planned Giving." Planned Giving supplements and enhances the overall development programs of the Fund by:

- Offering opportunities to make gifts during a donor's lifetime to those who desire to retain some income from their capital for themselves and their beneficiaries.
- Enabling donors to make larger gifts during their lifetime than could normally be made.
- Encouraging estate planning by offering lifetime and testamentary gift opportunities available under existing tax laws.

All donors who participate in a planned giving program and provide documentation to that effect are eligible for a component of the Fund's donor recognition program.

Planned giving may include, but is not limited to, Charitable Remainder Trusts (CRTs), Pooled Income Funds (PIFs), and other split-interest charitable vehicles administered by the Fund.

Acceptable Gifts

The following types of gifts are acceptable:

- Cash
- Cryptocurrency and tokens
- Digital assets
- Tangible personal property
- Securities
- Real estate
- Remainder interests in property
- Oil, gas and mineral rights/interests
- Bargain sales
- Vehicles, boats, et al
- Life insurance policies
- Charitable gift annuities
- Charitable remainder trusts
- Charitable lead trusts
- Retirement plan beneficiary designations
- Bequests
- Life insurance beneficiary designations

Other liquid and illiquid assets may be accepted on a case-by-case basis.

The Fund reserves the right, in its sole discretion, to liquidate, dispose of, or convert any accepted asset at such time and in such manner as it deems appropriate.

The Fund may require environmental assessments, title insurance, and other due diligence for real estate or similar assets and reserves the right to decline any asset that may expose the Fund to environmental or financial liability.

Use of Legal Counsel

The Fund shall seek the advice of legal counsel in matters relating to acceptance of gifts when appropriate. Such matters include, but are not limited to, the following:

- Closely held stock transfers that are subject to restrictions, buy-sell agreements or other arrangements that limit the marketability of the securities.
- Arrangements and documents pertaining to such arrangements where the Fund is named as Trustee.
- Gifts involving bargain sales or documents requiring the Fund to take or refrain from taking some action or assume an obligation.
- Transactions with potential conflicts of interest that may invoke IRS or other legal sanctions.

The Fund does not represent donors in any transaction and all donors are strongly encouraged to seek independent legal, tax, and financial advice.

Miscellaneous Provisions

It will be the responsibility of the donor to secure an appraisal when appropriate and engage the advice of independent legal and financial counsel for all gifts made to the Fund. The Fund always reserves the right to obtain an appraisal, at its own expense, of any tangible property or real estate offered for donation, prior to acceptance. In situations where advisors retained by the Fund prepare documents or render advice in any form to the Fund and a donor, it shall be disclosed in writing to the donor that the professional involved is in the employment of the Fund and is not acting on behalf of the donor. Any documents or other advice rendered in the course of the relationship between the Fund and the donor should be reviewed by counsel of the donor prior to completion of the gift.

The Fund may produce materials which educate and inform prospective donors and their advisors about the various forms of giving. The Fund may pay a fee to a third party as consideration for directing a gift to the Fund, however the Fund does not endorse any professional or fiduciary services.

The Chief Financial Officer of the Fund will be responsible for filing the required IRS Form 8282 (and make appropriate notation on an annual 990) upon the sale or disposition of any property sold or otherwise disposed of within three years of receipt by the Fund when the charitable deduction value of the item is greater than \$5,000. It is understood that the Fund must file this form within 125 days of the date of sale or disposition of the asset.

The Fund does not assign a value to contributed assets for purposes of a donor's tax deduction.

The Fund will not engage in transactions or accept contributions that violate U.S. sanctions laws or involve prohibited parties. All grants and contributions are subject to compliance with OFAC regulations and other applicable laws.

Donors are responsible for obtaining qualified appraisals as required under IRS regulations for non-cash contributions.

The Fund may engage independent fundraising professionals and compensate such parties in a manner consistent with applicable federal and state law. All compensation arrangements shall be reviewed for reasonableness and approved in accordance with the Fund's governance policies.

The Fund shall ensure that all fundraising activities are conducted in a manner consistent with ethical standards and do not involve undue pressure, misrepresentation, or actions inconsistent with donor intent.

Revisions to Gift Acceptance Policy

These policies have been reviewed and approved by the Fund Board of Directors. Except as otherwise stated within these written policies, the Gift Acceptance Committee must approve any exceptions to policy provisions. The Gift Acceptance Committee will periodically review these policies and make recommendations for revisions to the Board of Directors. Any changes in these written policies require approval of the Board of Directors.

This policy shall be periodically reviewed by the Gift Acceptance Committee, and any recommended revisions and updates will be presented to the Board of Directors for approval.