

GIFT ACCEPTANCE POLICY

PURPOSE

Common Threads solicits and accepts gifts that are consistent with its mission and that support its core programs, as well as special projects. Donations and other forms of support will generally be accepted from individuals, partnerships, corporations, foundations, government agencies, or other entities, subject to the limitations set forth in this Gift Acceptance Policy.

SCOPE

This Gift Acceptance Policy applies to all Board Members and any employee or representative authorized to accept gifts or donations on behalf of Common Threads.

DELEGATION OF AUTHORITY

The interpretation and enforcement of this Gift Acceptance Policy is delegated by the Board to the Finance Committee, except as expressly set forth herein. The Finance Committee acknowledges that gift acceptance is generally the purview of the Executive Director, and the Finance Committee shall confer with the Executive Director as needed in order to give effect to this Policy.

GIFTS ACCEPTED WITHOUT REVIEW

The Executive Director is generally authorized to solicit and accept gifts in their sole discretion, except gifts falling into the categories identified below (see "Specific

Limitations" and "Prohibited Gifts"). The Executive Director shall discuss any gift with potential negative impacts on Common Threads' mission (to be determined by the Executive Director in their sole discretion) with the Finance Committee prior to making any final decision, and such gifts must be approved by a majority of the Finance Committee. The Finance Committee may, in its discretion, seek the majority approval of the full Board prior to approving a gift.

Without limiting the generality of the foregoing, the following gifts are generally acceptable without review from the Finance Committee:

- *Cash* cash gifts are acceptable in any form, including by check, money order, credit card, or on-line.
- *Bequests* donors are encouraged to make bequests to Common Threads under their wills, and to name Common Threads as the beneficiary under life insurance policies, commercial annuities, and retirement plans.
- *Charitable Trusts.* Common Threads will accept designation as a beneficiary of charitable remainder trusts and charitable lead trusts.

GENERAL CONSIDERATIONS

When considering whether to solicit or accept gifts, the Finance Committee will consider the following factors:

- *Values* whether the acceptance of the gift compromises any of the core values of Common Threads
- *Compatibility* whether there is compatibility between the intent of the donor and the Common Threads' use of the gift
- *Public Relations* whether acceptance of the gift has the capacity to damage the reputation of Common Threads in the eyes of the public
- *Partnerships* whether acceptance of the gift will have negative effects on Common Threads' relationships with its partner organizations
- *Primary Benefit* whether the primary benefit is to Common Threads, as opposed to the donor
- Consistency whether acceptance of the gift is consistent with prior practice
- *Form of Gift* whether the gift is offered in a form that Common Threads can use without incurring substantial expense or difficulty
- *Effect on Future Giving* whether the gift will encourage or discourage future gifts

The Executive Director shall provide the Board with such information as may be necessary to evaluate a proposed gift in light of the above factors.

SPECIFIC RESTRICTIONS

The following gifts may not be solicited or accepted except on the majority approval of the Finance Committee:

- Gifts from the alcohol, tobacco, or cannabis industry, or those directly affiliated with such industries.
- Gifts of securities that are subject to restrictions or buy-sell agreements.
- Documents naming Common Threads as trustee or requiring Common Threads to act in any fiduciary capacity.
- Gifts requiring Common Threads to assume financial or other obligations.
- Transactions with potential conflicts of interest (see Conflicts of Interest Policy)
- Real property
- Used vehicles
- Tangible personal property of questionable marketability
- Any gifts that are too difficult or too expensive to administer in relation to their value

PROHIBITED GIFTS

Common Threads shall not accept gifts that would result in the violation of its articles of incorporation or bylaws, or that would result in Common Threads losing its status as an IRC § 501(c)(3) not-for-profit organization.

REVIEW

Adopted _____

Reviewed most recently on _____

Next review June 2021