WORLD FOOTPRINT FOUNDATION

GIFT ACCEPTANCE POLICY (GAP)

Policy Number: 2026-01-A
Original Effective Date: June 01, 2026
Amended & Restated Effective Date: Upon adoption by the Board of Directors on October 20th, 2026
Status: Approved by the Board

I. PURPOSE

The purpose of this Gift Acceptance Policy (GAP) is to provide clear guidance to the Board of Directors, staff, and prospective donors regarding the acceptance, administration, and stewardship of charitable contributions. This policy ensures that all gifts align with the Foundation's tax-exempt mission under Section 501(c)(3) of the Internal Revenue Code, adhere to donor restrictions that are consistent with the Foundation's charitable purposes, maintain transparency, and uphold institutional integrity and fiduciary compliance.

II. THE "CARNEGIE" PHILOSOPHY & PERPETUAL SOVEREIGNTY

The Foundation adheres to the "Carnegie Model" of philanthropy: equipping frontline institutions with the structural capital and tools necessary for permanent self-reliance. To advance this purpose, the Foundation prioritizes the capitalization of restricted, perpetual endowments for essential healthcare and educational organizations, while establishing an internal operational endowment to ensure the Foundation remains an enduring catalyst for community resilience.

III. BIFURCATION OF GIFTS & SUSTAINABILITY ALLOCATION

A. Gift Categories. For purposes of this policy:

a. **"Unrestricted Gift"** means a contribution made to the Foundation without a donor-imposed restriction as to purpose, including contributions made through the Foundation's general donation form.
b. **"Endowment Grant Program Gift"** means a contribution that the donor designates for the Foundation's restricted endowment grant program. Such a gift is held for, and applied only to, grants approved by the Board under the Grantmaking Policy (Policy No. 2026-04). It is not an Unrestricted Gift and is not subject to the allocation in Section III.B.3.
c. **"Non-Binding Recommendation"** means a donor's suggestion about an intended partner institution. A Non-Binding Recommendation does not bind the Foundation. If the Board declines to fund a recommended grantee, the Endowment Grant Program Gift is applied to another grant approved by the Board within the same program.

B. Policy Provisions.

1. **Board Variance Power & Non-Binding Donor Recommendations (IRS Anti-Conduit Standard):** In compliance with Internal Revenue Service anti-conduit standards (Treas. Reg. §

1.501(c)(3)-1, Rev. Rul. 63-252, and Rev. Rul. 66-79), the Foundation's Board of Directors retains sole, ultimate, and absolute discretion, control, and variance power over all contributions, gifts, and programmatic disbursements. Donors, philanthropic institutions, or Donor-Advised Funds (DAFs) contributing to the Foundation's frontline initiative may submit Non-Binding Recommendations regarding intended partner institutions. The Board of Directors exercises independent due diligence and reserves the absolute right to approve, modify, condition, or reallocate any recommended grant in furtherance of the Foundation's exempt charitable purposes.

2. **The 100% Pass-Through Rule for Approved Frontline Endowment Grants:** Once the Board of Directors independently reviews and approves a restricted endowment grant to an eligible partner public charity pursuant to the Foundation's Grantmaking Policy, exactly 100.0% of the funds allocated to that grant shall be disbursed directly into the grantee's segregated custodial account pursuant to an executed Restricted Endowment Grant Agreement. The Foundation prohibits the assessment, deduction, or retention of any administrative overhead fee, management fee, or operational haircut from Board-approved restricted endowment grants.
3. **Allocation of Unrestricted Gifts:** To sustain the Foundation's governance operations, compliance oversight, and multi-generational independence, up to 10% of Unrestricted Gifts made directly to the World Footprint Foundation may be allocated, at the Board of Directors' discretion, to seed and build the Foundation's internal permanent operating endowment reserve. The remaining balance of Unrestricted Gifts shall fund current charitable programs, grantee compliance auditing, and general operational expenses. The operating endowment shall be invested in accordance with the Foundation's adopted Investment Policy Statement and UPMIFA standards. This allocation does not apply to Endowment Grant Program Gifts or to Institutional Stewardship Contributions.
4. **Voluntary Institutional Stewardship Contributions:** Donors establishing or supporting restricted endowment grants are invited, but never required, to provide an optional, supplemental Institutional Stewardship Contribution (suggested at 10% of the principal grant amount) to underwrite the Foundation's independent due diligence, annual reporting, and UPMIFA compliance monitoring. Any donation form or page shall present this contribution as an opt-in choice that is never pre-selected. Making or declining the contribution has no effect on the Board's decision whether to approve any grant, and no grant approval is conditioned on it.

IV. TYPES OF GIFTS ACCEPTED

1. **Cash and Cash Equivalents:** Checks, wire transfers, ACH transfers, and online credit card donations are accepted without prior review.
2. **Marketable Securities:** Publicly traded stocks, bonds, and mutual fund shares are generally accepted. The Foundation will typically liquidate marketable securities promptly upon receipt. Proceeds of Endowment Grant Program Gifts pass through at 100% as provided in Section III.B.2, while proceeds of Unrestricted Gifts are allocated in accordance with Section III.B.3.
3. **Restricted Project / Programmatic Gifts:** Gifts designated for specific operational projects (distinct from permanent endowment grants) are subject to Board review to ensure alignment with charitable purposes and operational feasibility. The Foundation does not accept restricted gifts that impose conditions incompatible with its legal tax-exempt status or Bylaws.

V. VALUATION & TAX RESPONSIBILITY

The Foundation records all gifts at Fair Market Value (FMV) on the date of contribution, in accordance with IRS regulations and standard accounting practices. Donors are solely responsible for obtaining independent appraisals for non-cash gifts where required by IRS rules. The Foundation does not provide legal, tax, or financial advisory services to donors.

VI. FIDUCIARY ETHICS, CONFLICTS OF INTEREST & ADVISORY TRANSPARENCY

1. **Prohibition of Excess Benefit Transactions:** No gift shall be accepted, solicited, or structured if it creates an "Excess Benefit Transaction" or private inurement for any Disqualified Person, director, officer, or substantial contributor under Section 4958 of the Internal Revenue Code.
2. **Prohibition of Finder's Fees & Commissions:** The Foundation prohibits the payment of commissions, finder's fees, or percentage-based compensation to any director, officer, employee, or agent for procuring gifts or grants.
3. **Advisory Disclosure & Grantee Independence:** To ensure complete transparency:
    - Grantees receiving restricted endowment grants retain full, sovereign independence over their choice of qualified custodian and investment adviser.
    - Receipt of grant funding from the Foundation is never conditioned upon, tied to, or contingent upon retaining any specific investment adviser or commercial service provider.
    - Any potential conflict of interest involving common board members or affiliated service providers shall be formally disclosed in writing to donors and grantees in accordance with the Foundation's Conflict of Interest Policy.

VII. RIGHT TO DECLINE

The Board of Directors reserves the right to refuse or decline any gift that:

1. Violates the Foundation's Conflict of Interest Policy or threatens its 501(c)(3) public charity status;
2. Imposes undue administrative, legal, or financial burdens on the Foundation;
3. Compromises the Foundation's institutional autonomy or donor intent; or
4. Originates from sources whose activities or reputational standing conflict with the Foundation's mission of advancing health, education, and human wellbeing.

CERTIFICATE OF ADOPTION

I, **Inés Elvira Londoño**, Secretary of the World Footprint Foundation, certify that the foregoing Amended & Restated Gift Acceptance Policy (GAP) was duly adopted and ratified by the Board of Directors of the Foundation at a duly convened Special Meeting of the Board of Directors held on October 20th, 2026, superseding Version 1 dated June 01, 2026, and that said policy remains in full force and effect.

IN WITNESS WHEREOF, I have executed this Certificate as of October 20th, 2026.

(Signed original on file with the Foundation)

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Inés Elvira Londoño, Secretary
World Footprint Foundation

REVISION HISTORY

Version	Adoption Date	Summary of Modifications
1	June 01, 2026	Initial adoption of Gift Acceptance Policy (Resolution

Version	Adoption Date	Summary of Modifications
		No. 2026-01).
2	10/20/26	Amended & Restated (Policy No. 2026-01-A): defined gift categories; Board variance power over non-binding donor recommendations; 100% pass-through for Board-approved restricted endowment grants; allocation of up to 10% of Unrestricted Gifts, at the Board's discretion, to the internal operating endowment; opt-in, never pre-selected Institutional Stewardship Contribution; anti-tying advisory rules.