

# WARRIOR RISING

## GIFT ACCEPTANCE POLICY

Warrior Rising is a 501(c)(3) nonprofit organization that solicits and accepts gifts and donations that are consistent with its mission, and support its core programs and special projects. In order to protect the best interests of Warrior Rising, best serve the veterans who benefit from Warrior Rising services, and show the proper appreciation for our generous donors, Warrior Rising follows this policy in determining whether and how to accept charitable gifts.

### MISSION

**Warrior Rising empowers U.S. veterans and their immediate families, by providing opportunities to create sustainable businesses, perpetuate the hiring of fellow U.S. military veterans and earn their future.**

### GUIDING PRINCIPLES

- Warrior Rising willingly accepts all appropriate monetary and in-kind contributions of assets and skilled services consistent with its purpose and its nonprofit status, in accordance with its established acceptance policies and procedures as described herein.
- Warrior Rising urges all prospective donors to seek the assistance of personal legal and financial advisors in matters relating to gifts, such as tax and estate planning consequences. Warrior Rising is unable to provide these types of assistance to potential donors.
- Decisions of whether and how to accept charitable gifts will be made by recommendation of the Warrior Rising Executive Director, with approval by a majority of the board.
- Warrior Rising will seek the advice of legal counsel in matters related to acceptance of gifts when that is deemed necessary and appropriate by the Executive Director. Among others, Warrior Rising will seek advice of counsel for such donations as:
  - Gifts of securities;
  - Documents naming Warrior Rising as trustee or requiring Warrior Rising to act in any fiduciary capacity;
  - Gifts requiring Warrior Rising to assume any type of financial or other obligation;
  - Might present Warrior Rising or any of its board, staff, or program recipients to have a conflict of interest;
  - Gifts that might be subject to any type of regulatory restrictions.
- In situations where advisors retained by Warrior Rising prepare documents or render advice in any form to a donor to Warrior Rising, it shall be disclosed (a) that the professional involved is in the employ of Warrior Rising and is not acting on behalf of the donor, and (b) that any documents or other advice rendered in the course of the relationship between Warrior Rising and the donor should be reviewed by counsel for the donor prior to the completion of the gift.
- Warrior Rising will accept some forms of in-kind (non-monetary) gifts; however, Warrior Rising will not estimate the dollar value of such gifts for the donor.
- No fee or commission will be paid to any person or institution as consideration for directing a gift to Warrior Rising.
- Warrior Rising will periodically review this policy and reserves the right to modify it at any time by approval of the board of directors. If such modifications are made, the revised policy shall apply only to gifts made after the date of modification and shall not be applied retroactively to gifts made prior to that time.

## POLICY ON RESTRICTED GIFTS

In general, Warrior Rising prefers to accept gifts that in no way restrict the manner in which the gift might be applied toward the Warrior Rising mission.

Warrior Rising will not accept gifts:

- That are for purposes outside Warrior Rising's mission;
- From people or organizations that it believes discriminate against veterans, or provide or advocate for products or services it believes are not consistent with veterans' best interests;
- That would result in loss of its status as a 501(c)(3) nonprofit organization;
- That are too difficult or too expensive to administer in relation to their value;
- That are likely to require Warrior Rising to incur future organizational costs in order to maintain the gifts, if such costs might reasonably be expected to outweigh the value of these gifts;
- That are restricted for the benefit of one particular, pre-identified individual;
- That are restricted for the benefit of one particular, pre-identified group or class of individuals, such as by race, religion, creed, etc., or which are specifically excluded from benefiting any particular, pre-identified group or class of individuals;
- Of tangible personal property with the obligation for Warrior Rising to retain ownership of it in perpetuity;
- Of real property in which the donor maintains a life interest in the property.

Warrior Rising will accept restricted gifts only when it is confident a) the gift is fully consistent with the Warrior Rising mission, and b) that Warrior Rising has the ability to track the application of the gift to its purpose as intended by the donor. Warrior Rising will not incur unreasonable expenses to track the acceptance of a restricted gift or its application to Warrior Rising products and services; therefore, Warrior Rising will explain its gift acceptance and application tracking capabilities to potential donors in advance of accepting a restricted gift, and will request the donor's acknowledgement and acceptance of these capabilities before accepting the gift.

Notwithstanding anything set forth in this section, prior approval by the Board of Directors shall not be required for acceptance of the sponsorship of, or donations restricted to, special projects, specific events, or events restricted to certain locations (whether specific cities or states).

## GIFTS GENERALLY ACCEPTED WITHOUT REVIEW

In general, Warrior Rising is honored to accept gifts of the following types:

- Cash;
- Bequests through wills<sup>1</sup> and beneficiary designations under revocable trusts, life insurance policies, commercial annuities, and retirement plans;
- Charitable remainder trusts<sup>2</sup>;
- Charitable lead trusts;
- Charitable Gift Annuities

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<sup>1</sup> Unless the underlying property is of the nature of property that this policy otherwise states is not acceptable.

<sup>2</sup> Such trusts will not be marketed as tax avoidance devices or as investment vehicles, as it is understood such activity may violate federal and/or state securities regulations. No charitable remainder trust for which Warrior Rising serves as co-trustee will be encouraged that names as income beneficiaries, individuals under 60 years of age, or that names more than two income beneficiaries.

- Personal, professional, business, or educational services directly applicable to and valuable to Warrior Rising in pursuit of its mission.

## GIFTS THAT MAY OR MAY NOT BE ACCEPTED

Warrior Rising will not automatically accept gifts in this category. Decisions of whether to accept gifts in this category shall be made by the board. Warrior Rising's Board of Directors (or such board committees or non-board committees as the Board of Directors shall authorize for such purpose) will first review these potential gifts, with or without assistance from financial and legal counsel. Following review, the Warrior Rising Executive Director, or the chair of the reviewing committee, will recommend to the board whether to accept or reject these types of gifts, and seek a final board decision:

- Publicly traded securities: Securities traded on the New York or American stock exchanges, the NASDAQ Global Select or Global Markets, or other readily marketable securities, will be accepted provided the market value exceeds the cost to liquidate (for cash). It may be anticipated that such securities will be immediately sold. In no event will an employee or volunteer working on behalf of Warrior Rising commit to a donor that a particular security will be held for any specified time or subject to any donor restriction unless authorized by the Executive Director with the advice and consent of the Board of Directors.
- Closely held (Non-publicly traded) securities<sup>3</sup>
- Tangible personal property;
- Life insurance policies in which Warrior Rising is named as a policy owner and future premiums must be paid;
- Real estate<sup>4</sup> and timeshares;
- Business ownership interests;
- Animals;
- Perishable property or property that will require special facilities or security to safeguard properly;
- Any types of in-kind gifts, both tangible goods and in the form of services, that are not readily convertible into cash, or directly usable by Warrior Rising in the pursuit of its mission.

## GIFT ACKNOWLEDGMENT

Warrior Rising will provide written acknowledgement of all gifts made to Warrior Rising and comply with the current IRS requirements in acknowledgement of the gifts.

This includes the mandatory written acknowledgment given to donors of all donations greater than \$250, and any donation over \$75 when goods or services have been exchanged (e.g., tickets to a fundraising dinner or event).

## DONOR RECOGNITION

Warrior Rising is still exploring how donor giving will be recognized and acknowledged at different levels, and as this is determined, this written policy will be amended under this clause to indicate the benefits of the various levels, and the length of term of the recognition (e.g., annual, perpetually).

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<sup>3</sup> Prior to completion of any gift of this kind, Warrior Rising will not commit to re-sell it to any specific party or parties.

<sup>4</sup> Regarding a gift of real property, the Board of Directors will review to determine an acceptable deed and necessary documentation. The cost of obtaining necessary documents and fees associated with environmental studies, property taxes, transfer taxes, maintenance, management, insurance, appraisals, title reports, and all similar such legal fees should be borne by the donor.

Warrior Rising retains the right to terminate or modify any recognition if Warrior Rising's board of directors determines that a recognized donor is engaged in activities that conflict with the organization's mission or values or that the donor is otherwise involved in disreputable or criminal activities or activities that would dishonor or embarrass the organization.