

Gift Acceptance Policy for Trinity Cathedral Parish and The Trinity Foundation

The following policies and guidelines govern acceptance of gifts made to Trinity Cathedral Parish (the “Cathedral”) and the Trinity Foundation (the “Foundation”) (both of which are collectively referred to herein as “Trinity”). Trinity greatly appreciates the generosity of its members and this gift acceptance policy is intended to encourage gifts that support its ministries by providing clarity to donors about the gifting process so that their intentions are fulfilled.

Gift Acceptance Committee. Trinity’s Gift Acceptance Committee shall be comprised of the Dean, the Senior Warden, the Canon for Administration, the Chair of the Finance Committee, and the Foundation President. Trinity will not accept gifts that (a) would adversely impact Trinity’s status as a public charity under Internal Revenue Code Section 501(c)(3), (b) are too difficult or too expensive to administer in relation to their value, (c) are not either useful to Trinity or readily marketable, (d) could result in any unacceptable consequences for Trinity, or (e) are for purposes outside of Trinity’s mission.

- **Guidance from the Vestry and/or Trinity Foundation Commission.** The Gift Acceptance Committee will seek guidance from the Vestry and/or Trinity Foundation Commission (the “Commission”) for gifts that the Gift Acceptance Committee, in its discretion, determines to be of such nature that additional counsel would be appropriate.
- **Review of Legal Counsel.** The Gift Acceptance Committee will seek the advice of legal counsel in matters relating to acceptance of gifts when appropriate. Review by counsel is recommended for:
 - Any gifts of real estate, restricted securities, or interests in non-publicly traded securities.
 - All gifts requiring Trinity to assume financial or other obligations.
 - Any transactions with potential conflicts of interest.

No Tax or Legal Advice to Donors. Trinity does not provide tax or legal advice to donors and urges all prospective donors to seek the assistance of professional legal and financial advisors in matters relating to their gifts, including the resulting tax and estate planning consequences. Some contributions are only deductible if the donor acquires a qualified appraisal by an independent professional appraiser. In such instances, it will be the donor’s responsibility to obtain and pay for the appraisal. While Trinity will assist the donor in

complying with the Internal Revenue Service reporting requirements for Non-Cash Charitable Contributions by signing the Form 8283 that has been prepared by the donor or the donor's tax preparer to acknowledge receipt, execution of the Form 8283 does not represent Trinity's concurrence or agreement with the appraised value of the donated property. Furthermore, Trinity will determine in its sole discretion the holding period for any donated property and will not agree in advance to hold the property for any specific period of time.

Fiduciary Appointments. Trinity will not serve as a trustee or personal representative for a donor.

Gifts Generally Accepted Without Review. The following type of unrestricted gifts will generally be accepted without the approval of the Gift Acceptance Committee.

- Cash gifts are acceptable in any form, including by check, money order, electronic funds transfer, debit card and credit card.
- Unrestricted marketable securities may be transferred electronically to an account maintained by Trinity at a brokerage firm or delivered physically with the transferor's endorsement or signed stock power (with appropriate signature guarantees) attached. For accounting purposes, the value of a gift of marketable securities is the average of the high and low trading values on the date of the gift. Marketable securities will be sold immediately upon receipt.
- Distributions from life insurance policies, commercial annuities and retirement plans that designate Trinity as a beneficiary.

Gifts Subject to Review. Other types of property may be accepted, subject to review and approval by the Gift Acceptance Committee. Examples of gifts subject to review include, but are not limited to:

- **Tangible Personal Property.** The Gift Acceptance Committee shall review and determine whether to accept any gifts of tangible personal property in light of the following considerations:
 - Will the property be used by Trinity in connection with its exempt purpose?
 - Is the property marketable?
 - Are there any unacceptable restrictions imposed on the property?
 - Are there any carrying costs for the property?
 - Does the donor have good title to the property?
- **Life Insurance** Trinity will accept gifts of life insurance policies, subject to the approval of the Gift Acceptance Committee, where Trinity is named as both the owner and the beneficiary of the insurance policy and the donor agrees to pay future premium payments to maintain the policy. For accounting purposes, the value of a gift of a life insurance policy is the interpolated terminal reserve value of the policy

(as determined by the insurance company) as of the date of the gift.

- Real Estate The Gift Acceptance Committee shall review and determine whether to accept any gifts of real estate in light of the following considerations:
 - Is the property useful to Trinity?
 - Is the property readily marketable?
 - Are there covenants, conditions, restrictions, reservations, easements, mortgages, encumbrances or other limitations associated with the property?
 - Is there a current survey of the property?
 - Have all taxes and assessments been paid?
 - Is Trinity acquiring complete ownership or a partial interest in the property?
 - Are there carrying costs (including insurance, property taxes, mortgages, notes, utilities or other costs) or maintenance expenses associated with the property?
 - Does an environmental assessment or audit reflect that the property is damaged or otherwise requires remediation? It is highly recommended that an environmental assessment or audit be performed, based upon the advice of legal counsel.
 - Does the donor have marketable title to the property?

- Restricted and Non-Publicly-Traded Securities. The Gift Acceptance Committee shall review and determine whether to accept any gifts of interests in restricted marketable securities and non-publicly traded securities, such as closely-held interests in partnerships, corporations or limited liability companies in light of the following considerations:
 - Are the interests readily marketable?
 - Are there covenants, conditions, restrictions, or other limitations associated with the interest?
 - Are there carrying costs or capital contribution obligations associated with the interest?

Memorial and Honorary Gifts. Unless otherwise designated by the donor, memorial and honorary gifts will be allocated on an annual basis to one or more funds within, or administrative expenses of, the Foundation by the Finance Committee after consultation with the Commission.

Undesignated Gifts. Unless otherwise directed by the Gift Acceptance Committee:

- Deferred Gifts. All undesignated gifts received from an estate, a trust, by beneficiary designation or other direction upon the death of an individual (collectively referred to herein as “deferred gifts”) shall be considered extraordinary gifts and shall be allocated to the Foundation after payment of any outstanding stewardship campaign pledge for the current and preceding calendar

year and any outstanding capital campaign pledge for the donor.

- Allocation of Other Gifts. The Gift Acceptance Committee will give due consideration to the following guidelines in allocating any undesignated gift (other than a deferred gift):
 - If the gift is less than \$25,000 and is received by the Cathedral it shall be considered an ordinary contribution and added to the operating account.
 - If the gift is \$25,000 or more and is received by the Cathedral it shall be considered an extraordinary gift and shall be allocated to the Foundation.
 - An undesignated gift of any size that is received by the Foundation shall be considered an extraordinary gift and shall be allocated to the Foundation.

- Allocation of Foundation Gifts. The Gift Acceptance Committee will give due consideration to the following guidelines in allocating any undesignated gift received by or allocated to the Foundation as provided above:
 - Any portion of the gift that is valued at \$250,000 or less shall be added to the Foundation's General Endowment Fund unless the Commission directs all or part of the gift to one or more existing or newly-created funds within the Foundation which may be endowed or non-endowed funds.
 - Any portion of the gift that is valued between \$250,000 and \$500,000 shall be added to the Foundation's General Endowment Fund unless the Vestry directs all or part of the gift to one or more existing or newly-created funds within the Foundation which may be endowed or non-endowed funds.
 - If the value of the gift exceeds \$500,000, (a) one-half of the portion of the gift that is valued in excess of \$500,000 shall be added to the Foundation's General Endowment Fund unless the Commission directs all or part of the gift to one or more existing or newly-created funds within the Foundation which may be endowed or non-endowed funds and (b) one-half of the portion of the gift that is valued in excess of \$500,000 shall be added to the Foundation's General Endowment Fund unless the Vestry directs all or part of the gift to one or more existing or newly-created funds within the Foundation which may be endowed or non-endowed funds.

Designated Gifts. A donor may designate gifts for a particular program, ministry or project. Any such designated gifts should be in addition to the member's regular gift to the Cathedral's annual stewardship campaign so that the Cathedral's annual operating budget is not reduced as a result of the designated gift. If a designated fund exists to support the project or the ministry that the donor wishes to fund, the donor will be encouraged to add his or her gift to the existing designated fund. If a designated fund does not exist for

the project or ministry that the donor wishes to support, a new designated fund may be established, subject to the following conditions:

- Designated gifts must be for a project, established program or ministry of Trinity approved by the Gift Acceptance Committee together with the head of the project, program or ministry.
- All designations must be in writing and the donor must agree that if the purpose for which the designated gift is made is accomplished without expending all of the designated funds or in the event that the designated purpose is no longer desired by Trinity that Trinity may utilize any remaining portion of the gift as the Finance Committee deems appropriate.
- Designated gifts that are intended to create a permanent fund, which may be endowed or non-endowed, of greater than \$25,000 will be managed by the Commission. Designated gifts that are intended to be completely expended within twenty-four (24) months for the project or mission or that are intended to create a restricted fund that is not expected to exceed \$25,000 will be managed by the Cathedral.
- Although from time to time Trinity may facilitate the collection of gifts of money that are intended to be given as a gift from the parish community to a particular person, Trinity cannot acknowledge donations that are intended as a gift for a particular person as tax-deductible contributions to Trinity.
- If a gift is designated to purchase products or secure services, Trinity reserves the right to select the vendor or provider of the services. The designated monies and any item or service purchased with such monies shall remain the property of Trinity.

Recognition Opportunities. Trinity, on recommendation of the Gift Acceptance Committee and with the approval of the Vestry, may approve the recognition of extraordinary gifts for the improvement and/or maintenance of Trinity's campus and buildings or portions thereof. In the event that a facility or area benefiting from the extraordinary gift is demolished or significantly renovated or reconfigured, the Gift Acceptance Committee will also recommend to the Vestry the appropriate means of properly preserving the recognition.

Amendment Procedures. This Gift Acceptance Policy shall only be amended by the Vestry of the Cathedral which shall give due consideration to all proposals therefore by the Commission. This version of the Gift Acceptance Policy was approved by the Vestry of the Cathedral at its meeting on December 17, 2020 and supersedes all prior versions and revisions.