



CLINTON FOUNDATION GIFT ACCEPTANCE POLICY

Effective March 20, 2025

Purpose

The Clinton Foundation (“Foundation”) relies upon contributions to support its work to create economic opportunity, improve public health, and inspire civic engagement and service. This Gift Acceptance Policy (the “Policy”) governs the acceptance of gifts.

Definitions

For purposes of this Policy,

- A “**Gift**” is a voluntary transfer of assets from a person or organization to the Foundation. Gifts are motivated by a charitable intent and are generally irrevocable.
- “**Donors**” include individuals, charitable vehicles, foundations, corporations, governments, and any other entity that makes a gift or charitable grant to the Foundation.
- An “**unrestricted**” contribution is a gift that may be used by the Foundation for any legal purpose.
- A “**restricted**” contribution is a gift that may be used only for the project or purposes for which it has been designated by the donor in writing. A restricted gift may be “permanently restricted” or “temporarily restricted.” Temporarily restricted gifts are restricted only until a certain amount of time has passed or a certain condition is met.
- “**Donor identity unknown**” refers to gifts where the identity of the donor is unknown to the Foundation, usually transmitted by a third party such as a charitable gift fund.

Gift Acceptance Committee

The Foundation’s Gift Acceptance Committee (“GAC”) is responsible for assuring compliance with this Policy through the review and approval of certain gifts, including, without limitation, all gifts of non-liquid assets and any gift that may pose a material risk or liability, cost or undue administrative burden for the Foundation.

The GAC may refuse any gift that is inconsistent with the Foundation’s mission, this policy or for any other reason at the discretion of the GAC.

The GAC shall be comprised of the Foundation’s Chief Executive Officer, President, Chief Financial Officer, Chief Development Officer, and General Counsel.

General Gift Acceptance Principles

The Foundation only accepts gifts that support its charitable mission and reflect its values. The Foundation reserves the right to refuse any prospective gift, including any gift that:

- Is offered for a purpose that is inconsistent with the Foundation's mission;
- May in any way jeopardize the Foundation's good standing as a 501(c)(3) organization;
- May create an unreasonable financial or administrative burden;
- Offers little or no financial benefit;
- Has restrictions that violate the Foundation's ethical standards in any way;
- Could cause the Foundation to violate any Foundation policy or applicable law; or
- Otherwise does not pass the Foundation's internal review process.

Donor Identity Unknown Gifts. All donor identity unknown gifts over \$9,999.00 will be referred to the Gift Acceptance Committee for determination of acceptance or rejection.

Types of Gift Instruments the Foundation Accepts. Subject to the principles set forth above, the Foundation accepts the following types of gifts:

- Liquid assets, including cash, checks, credit card gifts, cryptocurrency and publicly traded securities;
- Non-liquid assets, including closely-held securities, interests in hedge funds, private equity interest, real estate and tangible personal property, provided, however, that all such gifts are subject to review and approval by the GAC;
- Gifts-In-Kind of real, tangible property and/or services (i.e., gifts-in-kind);
- Deferred gifts, including bequests and charitable remainder trusts, provided, however, that that Foundation will generally not accept appointment as a trustee;
- Multi-year commitments and pledges to be paid over time;
- Gifts made to the Foundation's endowment;
- Charitable lead trusts, provided, however, that the Foundation will generally not accept appointment as a trustee;
- Gifts made via donor advised funds; and
- Retirement plan assets.

The Foundation, in its sole discretion, may choose to accept other types of gift instruments not listed above on a case-by-case basis, upon review and approval by the GAC.

Gift Designations. Absent an explicit written donor designation, Gifts will be classified as unrestricted. The donor-designated purpose of restricted gifts must be clear and in writing. If the designated purpose becomes impossible or of no utility to the Foundation, the Foundation will make best efforts to contact the donor to seek permission to use the funds for a related purpose or modify the restriction. If the donor cannot be reached then with the authorization of the Gift Acceptance Committee, restricted gifts may be reclassified as unrestricted. Unless a different rate is specified, up to fifteen percent (15%) of all restricted gifts may be designated to support the Foundation's general operating expenses.

No Refund of Gifts. The Foundation does not refund gifts of any kind, including grants or sponsorships, unless it is determined that the Foundation has materially failed to honor the donor's intent, that circumstances exist that prevent the Foundation from honoring that intent, and an alternative use of the contribution is neither available nor allowed for in the contribution agreement. The Foundation may make limited exceptions to this no refunds policy, in its sole discretion.

Gift Receipt. Donors will receive a written gift receipt from the Foundation, consistent with the IRS requirements for substantiation of charitable gifts.

Donor Disclosure. The Foundation does not generally disclose its donors. Under certain circumstances, with the review and approval of the CEO, CDO, and the General Counsel, disclosure may be permitted or deemed in the best interest of the Foundation.

Donor Privacy. Donors are generally required to submit certain personal identifying information ("personal information") when making a donation. The Foundation takes donor privacy seriously and endeavors to keep donors' personal information secure, accurate and up-to-date. Consistent with the Foundation's Privacy Policy, donors may contact the Foundation by emailing development@clintonfoundation.org to update their personal information or request to be removed from Foundation distribution lists at any time. The Foundation will promptly comply with such requests. For additional information, please see the Foundation's [Privacy Policy](#).

Questions? Any questions about this Policy or the Foundation's gift acceptance procedures, should be directed to development@clintonfoundation.org.