

## Program Guidelines

A GUIDE TO YOUR GIVING FUND

### HAVEN CHARITABLE PROGRAM GUIDELINES

These Haven Charitable™ Program Guidelines (“Guidelines”) describe the donor-advised fund program (the “Program”) of Haven Charitable, Inc (“Haven Charitable™”), as well as important policies, procedures, and benefits associated with establishing and maintaining a donor-advised fund (“Giving Fund™”) at Haven Charitable.

All activities of Haven Charitable, and participation in the Program, are subject to the terms and conditions of the Haven Charitable, Inc. Articles of Incorporation (“Articles”) and these Guidelines.

Haven Charitable is governed by an independent Board of Directors (“Directors”), who are responsible for all aspects of its operations. The Directors reserve the right to modify the program and these Guidelines at any time, subject to the provisions of the Articles.



## Table Of Contents

GIVING FUND STRUCTURE AND OVERVIEW.....	3
CONTRIBUTIONS.....	6
TAX CONSIDERATIONS.....	11
GRANT RECOMMENDATIONS.....	14
INVESTMENT OPTIONS.....	18
FEES AND EXPENSES.....	19
RECORD KEEPING AND REPORTING.....	21
LEGACY OPTIONS.....	22
HAVEN GIVING INITIATIVE.....	25
SERVICE PROVIDERS.....	26
OTHER IMPORTANT STATEMENTS.....	27



# Giving Fund Structure and Overview

## ELIGIBILITY TO ESTABLISH A GIVING FUND

Individuals, families, companies, trusts, estates, private foundations, and other nonprofits are eligible to open a Giving Fund using the Haven Charitable Program.

## ESTABLISHING A GIVING FUND

Donors can establish a Giving Fund online at [www.havencharitable.org](http://www.havencharitable.org), by mail or by fax, by completing a Giving Fund Application. To enroll, a donor will need to:

1. Name the account
2. Designate advisor(s) and provide contact information
3. Select investment option(s)
4. Choose legacy option(s)
5. Read and agree to the terms within these Policies & Guidelines

Once the account has been opened, donors can make an irrevocable contribution to Haven Charitable of \$1,000 or more. Once Haven Charitable receives the contributed assets, all required paperwork in good order, and the Directors have formally accepted the contribution, the donor no longer has control over the assets. Haven Charitable will liquidate the assets, and the proceeds will be allocated into investment options in the account as recommended by the donor. The account is then eligible to support 501(c)(3) public charities in good standing with the IRS, in accordance with these Guidelines. Donors can make additional contributions at any time subject to approval by the Directors.

## NAMING THE GIVING FUND

As part of the application process, donors will be asked to give their Giving Fund a name. They can name it after themselves, their family, a charitable focus (Feed the Animals Fund, for example) or any other name that holds significance to them. Haven Charitable reserves the right to approve Giving Fund names.

## PRIMARY ADVISOR

The primary advisor is the individual or entity that opens a Giving Fund. They may recommend grants and asset allocations, view fund information and name other advisors and successor advisors.

## DESIGNATING CO-ADVISORS

A co-advisor can be added to the fund who has the same privileges as the primary donor. The co-advisor would remain an advisor to the fund in the event of the primary advisor's death. However, the primary advisor may remove and/or replace the co-advisor at any time by updating their account online or by completing a Giving Fund Update Form.



Both primary and joint advisors must be at least 18 years of age.

*Note: In this guide, the term “donor” and “advisor” may also be used to refer to the primary and joint advisors, particularly when addressing contribution and grantmaking activity.*

## DESIGNATING SECONDARY AND PROFESSIONAL ADVISORS

Primary and co-advisors may name secondary and professional advisors to their Giving Fund. Anyone being added or removed must provide written consent to their addition or removal.

**Secondary Advisors** - A secondary advisor serves concurrently with the primary and co-advisors. These individuals may be given authority to recommend grants and/or investment allocations. The primary advisor and co-advisor may have multiple secondary advisors, such as children, relatives, employees or friends, and can add or remove them at any time online or by completing a Giving Fund Update Form. Secondary advisors must be over the age of 18 unless the primary or co-advisor are their legal guardian. Secondary advisors are not successors to the fund unless the primary advisor has designated them as such.

**Professional Advisor** - Donors have the option to assign a financial advisor, CPA, attorney, or other professional advisor the authority to recommend investment allocations and/or submit grant recommendations. In addition, if a corporation has established a Giving Fund or there are several individuals contributing collaboratively, then individuals or corporate officers may be designated as professional advisors to recommend grants and/or investment allocations on behalf of the corporation or group's Giving Fund. Professional advisors are not successors to the fund unless the primary advisor has designated them as such.

## CORPORATE GIVING ACCOUNTS

Corporate Giving Accounts are available for those situations where it is more desirable to have a non-individual primary advisor.

## MODIFYING ACCOUNT HOLDERS INFORMATION

The primary advisor, or co-advisor if granted permission by advisor, may add or modify any other secondary advisor's contact information, or revoke another advisor's privileges, at any time via the Giving Fund Update Form. Advisors being added or removed must provide written consent to their addition or removal.

## STATEMENTS

At the end of each quarter, account advisors and all authorized parties receive an account statement, which summarizes the Giving Fund balance, contribution and grant transactions, and all other activity from the most recent quarter. In January, the statement includes a summary of all account activity for the preceding calendar year. Statements are not intended for tax-reporting purposes. Advisors and other authorized parties may opt to receive account statements electronically or via U.S. mail.



## GIVING FUND ABANDONMENT

When a Giving Fund has failed to meet the minimum account activity requirements, has little or no other activity, and repeated attempts to contact account advisor(s) has failed, Haven Charitable will enact the last known Succession Plan of record. (For more information, refer to “minimum account activity”.) If a succession plan does not exist or cannot be implemented, Haven Charitable will transfer the account’s remaining assets to the Haven Giving Initiative. For more on succession planning, refer to Legacy Options on page 22.



# Contributions

## OVERVIEW

Contributions that are accepted by Haven Charitable are unconditional and irrevocable. All contributions and any future related earnings are no longer the property of the donor; they are owned by Haven Charitable and will be used solely for charitable purposes. For this reason, when contributing, the donor cannot impose any restrictions or conditions that prevent Haven Charitable from freely and effectively using the gift to further its charitable mission.

All contributions are subject to review and approval by the Directors. The Directors reserve the right, in their sole discretion and for any reason, to reject a contribution if it will be difficult to process, cause excessive unreimbursed expenses, or for any other reason not to accept any contribution. Staff may review contributions on behalf of and at the direction of the Directors. Although Haven Charitable may have received and/or taken possession of a contribution, it is not accepted until deemed so by the Directors. Haven Charitable performs the requisite due diligence on all contributions and may choose to decline a contribution upon completion of its due diligence. If Haven Charitable determines that it will not accept a contribution, the property will be returned to the donor as soon as possible. Once Haven Charitable accepts a contribution, it is irrevocable and is owned and controlled by the Directors. The Directors have exclusive legal control over all contributed assets. Contributions to Haven Charitable are not refundable.

## MINIMUM CONTRIBUTION

The minimum initial contribution to Haven Charitable for the establishment of a Giving Fund is \$500. There are no required minimums for subsequent contributions, however some forms of assets have minimum contributions limits as stated below.

## TYPES OF ACCEPTED ASSETS

**CASH EQUIVALENTS** - Haven Charitable accepts cash-equivalent gifts of U.S. dollars in the form of personal check, wire, or money order. Checks and wires must be drawn on a U.S. financial institution. Checks and money orders should be made payable to Haven Charitable Inc and contributions are generally deposited on the day they are received. Please also indicate the name and/or number of the Giving Fund in the memo field. Contributions to Haven Charitable are typically in U.S. dollars but cash equivalents denominated in select foreign currencies are acceptable, on a case-by-case basis. The Directors reserve the right to approve or deny any contribution. After receiving acceptable paperwork and the contributed assets in good order, Haven Charitable will generally process the contribution with 5 business days.

**ELECTRONIC FUNDS TRANSFER (EFT)** - A primary advisor may make a contribution to Haven Charitable using Electronic Funds Transfer (EFT) to transfer funds electronically from the primary advisor's bank account. The primary advisor can make a one-time or automatic recurring EFT contributions. For an individual Giving Fund, the primary advisor's bank account must be either a personal savings account or a personal checking account. For a corporate Giving Fund, the corporate bank accounts must be an account on which the Giving Fund



contact is authorized to act on behalf of the corporate entity. The corporate bank account must be at a U.S. bank. The minimum EFT transaction amount from a primary advisor's bank account to Haven Charitable is \$50 and the maximum amount is \$100,000.

Contributions that have been made to Haven Charitable from a bank account by EFT are not available for grant or investment recommendations until the funds are received by Haven Charitable. A confirmation will be sent to the Account Holder indicating the date the contribution was received by Haven Charitable. Haven Charitable shall not be liable for the failure to complete an EFT transaction as instructed by the primary advisor.

**CRYPTOCURRENCY AND DIGITAL ASSETS** - Haven Charitable accepts cryptocurrency and digital asset contributions. Due to the complex nature of these instruments, please contact Haven Charitable for more details.

**PUBLICLY TRADED SECURITIES** - Haven accepts publicly traded securities such as: Mutual fund shares, stocks and bonds. Upon receiving the appropriate paperwork and the donated securities in good order, Haven Charitable will generally sell the securities at the earliest date possible but reserves the right to sell at any time.

Once Haven Charitable has received the original Letter of Instruction, attached to the Contribution Form or the Giving Fund Application, a typical transfer initiated by Haven Charitable takes three to five weeks depending on the type of securities and how quickly they are transferred by the originating financial institution. Transfers initiated by the primary advisor at the originating financial institution may be completed more quickly.

Contributions of securities held in a brokerage account (in street name) are effective, for tax-reporting purposes, on the date the account holder can no longer recall the asset. Haven Charitable considers contributions as irrevocable as soon as they are credited to the account.

When making the transfer, the primary advisor should indicate both the number of shares and the approximate value of the donation. Because security values may fluctuate, Haven Charitable transfers assets based on the number of shares and not the approximate value. Shares are contributed based on the current cost-basis method unless otherwise specified.

**CERTIFICATED SECURITIES** - In order for Haven Charitable to accept physical stock certificates, they must be endorsed by all registered owners of the contributed assets and accompanied by an irrevocable stock power form. The contribution is effective when the account holder makes unconditional delivery of the properly endorsed certificates, or if the contributions are sent by U.S. mail, the effective date is the date the securities are mailed and postmarked.

**PUBLICLY TRADED PARTNERSHIPS AND MASTER LIMITED PARTNERSHIPS** - The contribution of publicly traded partnerships and master limited partnerships of such assets may trigger adverse consequences for both Haven Charitable and the primary advisor. Before contributing these types of assets, primary advisors should consult a tax advisor. Contributions of publicly traded partnerships and master limited partnerships may trigger additional costs and longer processing times.



COMPLEX ASSETS AND RESTRICTED STOCK - Non-publicly traded assets, such as shares and interests in privately held companies, real estate, certain cryptocurrency, and certain oil and gas interests, are commonly accepted but require a case-by-case analysis. Generally, contribution acceptance is subject to the marketability of the securities and the issuer's approval of the sale of such securities.

Please contact a Haven Charitable representative for an estimated time frame for consideration and acceptance when contributing complex assets, restricted stock or non-publicly traded assets (assets that are not readily liquid), including real estate. Approval and processing times of complex assets and restricted stock will vary depending on the type of asset being contributed and may incur additional costs.

## CONTRIBUTION PROCESSING TIMES

All contributions are subject to review and approval by Haven Charitable. Processing times vary for different asset types, as generally described above. Haven Charitable processes and liquidate contributions as quickly as possible after all the requisite paperwork has been received, and after the assets have been received in good order.

Donors should allow for sufficient time, especially at end of year, to allow for contribution acceptance. For example, it cannot be assumed that a contribution made at 11:55 p.m. on December 31 will, in fact, be accepted.

Some contributions are quick and may be made entirely online, while others require a signed Contribution Form and an attached Letter of Instruction for processing. Contact a Haven Charitable representative for further instructions.

## COSTS ASSOCIATED WITH CONTRIBUTIONS

Once a contribution is accepted, Haven Charitable will seek to liquidate contributed assets promptly. Any costs Haven Charitable incurs in connection with the acceptance, holding or liquidation of contributed assets (credit card processing fees, digital asset transaction fees and slippage, EFT fees, commissions, legal or appraisal fees) will reduce the balance of the Giving Fund. This includes, but is not limited to, tax consequences such as "unrelated business income tax" to Haven Charitable in connection with contributions of certain forms of property including partnerships or passthrough entities. Haven Charitable may allocate such costs to the Giving Fund for which the contribution is intended. The net proceeds of the liquidation of contributed assets are reflected in the account balance of the donor's Giving Fund.

## OTHER CONTRIBUTION FEES

Haven Charitable reserves the right to assess additional fees on individual Giving Funds to cover special costs. When possible, fees will be communicated to account advisors and donors in advance of the contribution.





## CONFIRMATIONS OF CONTRIBUTIONS

When the contribution process is complete, Haven Charitable will send a confirmation via email or U.S. mail to the primary advisor, which contains a description of the contributed assets, as required by law. The letter shows a summary of account investments and the investment allocation of the net gift proceeds. This letter is not a tax substantiation letter and should not be used for such purposes.

In addition, Haven Charitable will send the donor a substantiation letter for tax-reporting purposes. The substantiation letter does not include a contribution value, except when the contribution is defined in dollar terms (such as a check, wire, and some mutual fund gifts). Proper gift valuation for tax-reporting purposes is the responsibility of the donor. If a donor is considering a contribution of non-publicly traded assets, they should consult their tax advisor to ensure compliance with IRS requirements, which may include obtaining a qualified independent appraisal, and reporting such valuation to the IRS on IRS Form 8283.

Confirmations should be read carefully. Any error must be reported to Haven Charitable within 60 days of receipt. Any fair market value computation reported on a confirmation is a good faith estimate on the part of Haven Charitable and is provided as a courtesy to advisors. Donors are responsible for the value they claim as a deduction on their tax returns and before claiming any tax deduction for contributions to Haven, it is recommended that they consult their tax advisor.

If any third-parties contribute to a Giving Fund, the primary advisor will receive a notification. This notification is not a tax receipt. Under federal income tax rules, primary advisors generally are not entitled to claim a deduction for charitable contributions made by third parties to their Giving Fund.

## TESTAMENTARY GIFTS AND TRUST DISTRIBUTIONS

A primary advisor may name Haven Charitable as a charitable beneficiary of cash equivalents, securities, real estate or other property in their will or other testamentary instrument. In addition, a primary advisor may also name Haven Charitable as a charitable beneficiary with respect to other non-probate property or other accounts allowing designation of beneficiaries, including but not limited to:

- retirement plans
- charitable trusts
- life insurance
- brokerage accounts

Individual accounts may be established by trusts and estates if specifically directed by the applicable testamentary instrument, however an individual must be named as the primary advisor. Haven Charitable will not accept advisory privilege designations (such as naming advisors, recommending grants, or naming successors) through testamentary instruments. Depending on what the testamentary instrument or beneficiary designation specifically directs, contributions may be made to Haven Charitable for allocation to an existing account, or to an account established at the time of the bequest.



Trusts or estates making charitable contributions to a Haven Charitable donor-advised fund receive a written acknowledgment that meets IRS requirements. Haven Charitable must review and approve all contributions and any contribution that Haven Charitable does not accept is returned as soon as possible.

Donors should consult with an estate planning attorney for appropriate beneficiary or testamentary language so that all Giving Fund establishment requirements are satisfied.



# Tax Considerations

## CHARITABLE DEDUCTIONS

These Guidelines provide a general overview of selected U.S. federal tax considerations and is not personal legal or tax advice, nor is it intended to be. Individual circumstances as well as state and local tax laws may vary. Haven Charitable recommends donors consult a tax advisor for guidance on the effect of applicable federal, state, and local tax law on their personal financial situation.

## SUMMARY OF FAIR MARKET VALUE ACKNOWLEDGMENT

ASSET TYPE	ESTIMATED VALUATION PROVIDED ON ACKNOWLEDGMENT
Cash	The deduction is for the amount of the contribution
Publicly traded securities	For publicly traded securities (including foreign securities) readily tradable on an established securities market, with no material restrictions, that have been held for more than one year, the donor's tax deduction will generally be the fair market value of the securities on the date the contribution is made (for this purpose, the IRS determines fair market value to be the mean of the high and low prices reported on the date the contribution is made). For securities held for one year or less, the deduction is generally limited to the lesser of the donor's cost basis or the fair market value.
Mutual funds	For mutual fund shares held for more than one year, the deduction will be for the fair market value of the shares contributed, determined as of the closing price on the date the contribution is made. For mutual fund shares held for one year or less, the deduction is generally limited to the lesser of the donor's cost basis or the fair market value.
Thinly traded stock	No estimated valuation provided if no selling prices are available on a date within a reasonable period before and/or after the contribution date.
Publicly traded securities (including foreign securities) with material restriction	No estimated valuation provided
Master limited partnerships or publicly traded partnerships	No estimated valuation provided
Non-publicly traded securities	No estimated valuation provided
Pass-through interests (LLPs, LLCs, LPs)	No estimated valuation provided
Real estate and real-estate related	No estimated valuation provided
Life insurance	No estimated valuation provided
All other illiquid assets (art, collectibles, etc.)	No estimated valuation provided



## AGI PERCENTAGE LIMITS

Under the Internal Revenue Code (“the Code”), deductions for charitable contributions are subject to certain “percentage limitations” that limit the deductions that can be taken to a stated percentage of adjusted gross income (“AGI”) in the year the deduction is taken. Generally, deductions for charitable contributions of cash cannot exceed 60% of a taxpayer’s adjusted gross income (AGI) and a 30% limit applies to contributions of property subject to long-term capital gains (e.g., appreciated securities held for more than one year). Because Haven Charitable is a public charity, the percentage limitations that apply are generally the most favorable charitable deductions available under IRS rules. However, a donor’s ability to take itemized deductions may be subject to certain other limitations. Donors should contact a tax advisor to determine the tax deductibility limits that apply to their specific situation.

## DEDUCTION CARRYFORWARDS

Contributions exceeding AGI limits may be carried forward on tax returns. As long as the donor takes the maximum available deduction each year, they can carry it forward for five years. Haven Charitable strongly encourages donors to consult with a tax advisor when considering the use of charitable contribution deduction carryforwards.

## GIFT VALUATION

U.S. federal tax regulations provide guidelines for gift valuation and in general, a contribution’s value is based on the type of asset donated and date of contribution, which ordinarily is the date when the asset is transferred to Haven Charitable. This date may vary depending on the donated asset type. Under IRS regulations, the donor is responsible for determining the valuation date and corresponding fair market value for donated securities.

## VALUE CHANGES AFTER DONATION

Because market prices for securities frequently shift throughout the day, the net proceeds of a security sale rarely equal the fair market value of the security on the date of contribution. If the value of the asset grows after it has been contributed, the donor is not entitled to any additional deductions.

## TAX TREATMENT OF HAVEN CHARITABLE INCOME

Any income that accrues from a contribution to a Giving Fund is income of Haven Charitable and is not part of the advisor’s taxable estate. The primary advisor is not subject to tax on that income, nor are they eligible to take additional charitable contribution deductions on that income. Any income or loss to Haven Charitable will be reflected in the value of each Giving Fund.

## TAX TREATMENT OF GRANTS MADE TO CHARITABLE ORGANIZATIONS

When grants are disbursed from Haven Charitable based upon advisor recommendation, Haven Charitable is granting its own assets. For this reason, primary advisors are not eligible for additional charitable deductions when they recommend grants from Haven Charitable.



## TAX REPORTING

If a donor contributes \$500 or more in publicly traded securities, Haven Charitable will provide an IRS Form 8283 showing an estimate of the fair market value of the contribution(s) as described above. However, donors are ultimately responsible for ensuring that the information they file with their tax returns, including the information on Form 8283, is complete and accurate. The IRS requires taxpayers to complete and file a Form 8283 with their federal income tax return for gifts of property (including publicly traded and other securities, as well as non-publicly traded assets) valued at \$500 or more. If the value of your gift exceeds \$5,000 and the property is not publicly traded securities or other specifically excluded assets, an independent qualified appraisal is required. For additional information regarding taxpayer filing and substantiation requirements, donors are encouraged to consult a tax advisor

## QUALIFIED APPRAISAL REQUIREMENTS

For some types of donations, such as if a donor itemizes their taxes and claims a deduction greater than \$5,000, the IRS requires an independent qualified appraisal. In this circumstance, the donor must complete IRS Form 8283, Section B. The donor may send the completed IRS Form 8283, Section B to Haven Charitable for an acknowledgment signature. The Haven Charitable signature acknowledges receipt of the gift. However, it does not endorse the valuation in any way. Valuation is the responsibility of the donor and Haven Charitable is not required to, and will not, assign or certify a gift's value for the Form 8283 or sign the Form 8283 for gifts of publicly traded securities. For additional information regarding taxpayer filing and substantiation requirements, Haven Charitable recommends donors consult a tax advisor.



# Grant Recommendations

## OVERVIEW

Once an account is funded, account advisors and authorized interested parties may recommend grants at any time to qualified 501(c)(3) public charities. Grant recommendations can be submitted electronically or with a paper form. Handwritten letters or lists of organizations will not be accepted.

Grant recommendations are not binding and are subject to review and approval by the Directors in their sole discretion. The Directors have adopted procedures and safeguards with respect to grantmaking to ensure that funds are used exclusively in furtherance of charitable purposes.

In the event that one or more grant recommendations from an advisor or interested party with full account access violates the guidelines detailed in this section, Haven Charitable reserves the right to transfer account assets to the Haven Giving Initiative. For more information on Haven Giving initiative, refer to page 26.

## ELIGIBLE RECIPIENTS

Grants can be made only to IRS-qualified public charities that are tax exempt under section 501(c)(3) and are classified as public charities under section 509(a)(1), (a)(2) or (a)(3) of the Code; or are classified as private operating foundations under section 4942(j)(3) of the Code. Eligible recipient charities include but are not limited to:

- hospitals and healthcare organizations
- scientific and medical research organizations
- religious organizations and places of worship
- environmental organizations
- schools and educational institutions
- museums and arts organizations
- organizations formed and operated for charitable purposes

## PROHIBITED RECIPIENTS AND GRANT RESTRICTIONS

The following entities are ineligible for grants from Haven Charitable:

- private foundations unless they are private operating foundations
- non-functioning Integrated Type III Supporting Organizations
- Non-US charities (except on a case-by-case basis)

IRS regulations restrict Haven Charitable from making grants that are used for lobbying purposes or to support political campaigns, or to pay for membership costs, tickets to benefit dinners, charitable auction items, school tuition, or grants for any other benefit for a specific individual.



## NON-U.S. CHARITIES

Haven Charitable does not generally make grants to non-U.S. charitable organizations (organizations not formed under the laws of the United States and its territories). Haven Charitable may, however, make grants to U.S. public charities that carry on or provide funding for charitable activities outside the United States. As with all grant recommendations, these grants are subject to review and approval by the Directors in their sole discretion.

On a case-by-case basis, Haven Charitable may approve grants that issue funds directly to foreign organizations. Because of strict IRS regulations, shifting government sanctions, and varying countries' laws, advisors who initiate direct international grants should plan for extended processing time frames, expansive due diligence requirements, higher grant minimums, and additional fees.

## SUPPORTING ORGANIZATIONS

As a result of the Pension Protection Act of 2006, the Code includes restrictions and penalties for grants issued from a donor-advised fund to Type III non-functionally integrated supporting organizations. The legislation requires Haven Charitable and other charities with donor-advised fund programs to perform "expenditure responsibility" on grants to non-functionally integrated Type III supporting organizations. Because Haven Charitable does not generally perform expenditure responsibility on grants, it will generally not make grants to non-functionally integrated Type III supporting organizations.

Haven Charitable may not make grants to supporting organizations that support organizations controlled directly or indirectly by Disqualified Persons (as that term is defined in the Code).

## DUE DILIGENCE

The Directors have adopted procedures and safeguards as stated in the Program policies with respect to grantmaking to ensure that funds are used exclusively in furtherance of charitable purposes. Haven Charitable will determine the eligibility of the charitable grant recipients and perform appropriate due diligence to assure that the recommended grant meets IRS guidelines, as well as the Program policies. If it is determined that a grant made by Haven Charitable does not meet the IRS guidelines and/or the Program Guidelines, Haven Charitable reserves the right to take any and all appropriate action to ensure that the assets are utilized solely for charitable purposes and that no impermissible private benefit has been received by any individual.

## MINIMUM ACCOUNT ACTIVITY

If a Giving Fund has not recommended a grant within 30 months from the last recommendation, Haven Charitable will attempt to contact the Giving Fund advisors to initiate at least one \$500 grant. If contact attempts are unsuccessful after six months, Haven Charitable reserves the right to take the following actions:

- If the balance of the Giving Fund is over \$10,000, Haven Charitable will issue a grant(s) equal to 5% of the Giving Fund balance directly to qualified public charities according to the recommendations in the advisor's Succession Plan. If a successor organization is ineligible to



receive a grant from Haven Charitable, pursuant to the grantmaking guidelines, the portion of the Giving Fund balance designated for that successor will be distributed to the remaining IRS-qualified public charities in the recommended proportions. If there are no successors, or the successors are ineligible, the balance will be granted out in accordance with Haven's Giving Initiative (see page 26).

- For Giving Funds with balances less than \$10,000, Haven will initiate the Succession Plan as recommended by the primary advisor.

## MINIMUM GRANT MAKING ACTIVITY

Haven Charitable aims to have grant distributions that significantly exceeded 10% of average net assets on a current five-year rolling basis. However, should the rolling aggregate grant activity average fall below 5% of Haven Charitable's collective asset balance, the Haven Charitable will ask for grant recommendations from Giving Fund that have not had grant activity of at least 5% of the Giving Fund's average net assets over the same five-year period. If Account Holders on these Giving Accounts do not make grant recommendations within 60 days, Haven Charitable will grant the required amounts out in accordance with the Haven Giving Initiative (described on page 26), in its sole discretion.

## TIMING

Grant recommendations are reviewed and processed weekly. Haven Charitable approves only those grants that are used exclusively in furtherance of charitable purposes. Following a review of recommended grant recipient's eligibility, the Directors shall approve or disapprove the grant recommendations. In accordance with that policy, Haven Charitable reserves the right to perform additional due diligence and to decline to make a recommended grant to a charitable organization, the Directors have exclusive legal control over the assets contributed, the investment of such assets, and the charitable use of such assets.

Once the grant recommendation is approved, the grant is made as soon as possible. The advisors should allow for 10 to 14 business days between the time of submission of a grant request and the mailing of the check to a charitable recipient. In the event a grant is not approved, the primary advisor, and co-advisor if applicable, of the Giving Fund will be notified regarding the reasons for such disapproval.

If a grant recommendation is to a charity not previously reviewed and verified by Haven Charitable, particularly to certain supporting organizations described in sections 501(c)(3) and 509(a)(3) of the Code, it will require additional due diligence and will often take longer to review, and the Giving Fund may incur additional fees. Pool unit values may fluctuate between the time of the recommendation and the grant's actual distribution.

## GRANT ISSUANCE

Grants are issued in check form and mailed by Haven Charitable directly to the recipient organization's verified address. All checks are made payable to the legal name of the recipient





organization. However, if the recipient has a Giving Fund set up with Haven, funds may be transferred directly to their donor advised fund.

## COMMUNICATION

Charities who are receiving their first grant from Haven Charitable may be contacted directly before a grant is issued. After a grant has been issued, Haven Charitable may contact the recipient to ensure the grant was used for its stated purpose.

## BALANCE AND INVESTMENT CONSIDERATIONS

When making a grant recommendation, authorized advisors must determine the total dollar amount of the grant and may also select the investment allocation(s) from which to pull the funds. Haven Charitable will not approve grants in amounts greater than an available account balance. If Giving Fund has multiple allocations and the advisor does not indicate which investment allocation to pull the funds from, then Haven will apply a weighted distribution of all available investment options. If the balance of one investment option in the account is insufficient to meet the requested grant allocation, Haven Charitable will allocate the grant by a weighted distribution from all remaining investment allocations.

## ANONYMOUS GRANTS

Advisors can choose to remain anonymous and to not be identified. Grants will be identified as “a Haven Charitable Giving Fund donor that wishes to remain anonymous”. Haven Charitable will not release the advisors name and contact information to any recipient charity without the advisor’s explicit consent. Haven Charitable may however, in its judgment, choose to limit anonymity.

## GRANT LETTER

Once a grant is approved, Haven will send a grant check to the recipient charitable organization. The grant letter indicates the purpose of the grant and the Giving Fund from which the grant was funded, unless anonymity is requested. Haven Charitable’s grant letter informs the recipient charity that it should not provide the advisor with a tax receipt for the grant, and that it may not provide a private benefit to any donor.



# Investment Options

## OVERVIEW

After a contribution has been liquidated, the net proceeds are invested, based on the recommendation of the advisor(s). Primary advisors and other designated advisors may recommend how funds in a Giving Fund are allocated among one or more available investment options based upon their risk tolerance and giving objectives. If an advisor chooses not to recommend a portfolio asset allocation, Haven Charitable allocates the contribution to investments as determined by the Directors of Haven Charitable in its sole discretion.

All investment allocation recommendations are subject to review and approval by the Directors. The Directors have sole responsibility and authority to invest Haven Charitable's assets. In addition, the Directors will select, approve, and periodically review all investment options and may occasionally adjust the composition of the investments.

As owner of all account assets, Haven Charitable has elected to reinvest all dividends and capital gains. Therefore, accumulated dividends and capital gains are retained within the investment options and are continually reflected in each respective option's net asset value. At the time of contribution, Haven Charitable becomes the sole owner of the assets. Because of this, any growth (or decline) of asset value in the Giving Fund due to market movement, does not impact the ability of the donor to take a deduction for contributions or the amount of such deduction. Market-based account growth or decline is considered tax-free and may not be claimed as an additional deduction or a loss.

To view Haven Charitable's investment options, along with current expense ratios and past performance, visit [havencharitable.org/investments](https://havencharitable.org/investments). Haven may allow primary advisors to designate an investment advisor or custom strategy for Giving Funds over \$1 million, on a case-by-case basis.

## INVESTMENT ALLOCATION PROCESS

Haven Charitable seeks to sell contributed property promptly and allocate the net proceeds of each sale to the Giving Fund once they are received.

Cash equivalent donations are allocated to the Giving Fund generally within 3 to 5 business days of receipt. Haven Charitable will allocate donations to the Giving Fund equal in value to the cash-equivalent contribution, less any expenses incurred by Haven Charitable in funding the Giving Fund.

For all other contributions, including publicly traded securities, Haven Charitable will liquidate the contribution in a timely manner. Funds from contributions will be allocated to a Giving Fund when the net proceeds are received and Haven Charitable has been reimbursed for applicable expenses. Once the proceeds from contributions to an account become available, Haven Charitable invests them in investment pool shares as soon as administratively possible.



# Fees And Expenses

## ADMINISTRATIVE FEE

Haven Charitable incurs administrative expenses associated with regulatory compliance and its operation as a grantmaking charitable organization. Administrative fees cover these costs, which include online donor services, phone support, grant processing and administration, charity due diligence and eligibility review, tax filings, reporting, and communications. The administrative fee is charged to the investment pool and affects the net asset value of the Giving Fund pool holdings. The following blended fee schedule will be applied to the Giving Fund at the end of each month, based upon the daily average balance of the Giving Fund for that month. This fee schedule results in a weighted average of the basis points associated with each asset tier. The minimum administrative fee is \$100 per year.

## FEE SCHEDULE

MONTH'S AVERAGE DAILY BALANCE	ANNUALIZED ADMINISTRATION FEE
Up to \$10,000,000	0.75% (75 basis points)
\$10,000,000 and up	0.60% (60 basis points)

## INVESTMENT FEES

Each money market fund and underlying investment in the model portfolios is subject to varying operating and management expenses/fees. In addition, each model portfolio charges an investment advisory fee and/or incurs trading costs associated with the management of the portfolio.

Investment fees do not display as line items on Giving Fund statements. Rather, the annual expense is spread over the year with daily assessments that are reflected in the investment option's net asset values. This method, which is widely used for mutual fund investment fees, ensures that a Giving Fund is charged fairly, regardless of activity or longevity. Underlying investments, and therefore Giving Fund balances, will fluctuate in response to market conditions.

Each investment pool will be invested in the investments described in the Investment Option Addendum as modified by the Directors from time to time. The estimated weighted average management fee of each investment pool is shown in the Investment Option Addendum, based on third-party sources Haven Charitable deems reliable and is subject to change at any time.

## TRADING AND LIQUIDATION FEES

Commissions and other fees incurred by Haven Charitable in connection with contributed property will reduce the net proceeds credited to the Giving Fund.



## ADDITIONAL FEES AND EXTRAORDINARY COSTS

Additional fees may apply for additional programs, services, or investment options. While the need to do so is rare, Haven Charitable reserves the right to deduct extraordinary costs incurred as a result of an account's activity. This may include legal and professional costs, taxes, or transaction costs.

## ILLIQUID GIVING FUND FEES

Where fees cannot be collected on the monthly basis due to a cash shortfall or an inability to sell securities or other property, these fees shall accrue interest at the rate of one percent (1%) per month will be charged on accrued amounts, and interest shall accrue monthly. All accrued amounts and interest shall become due and payable when the property is sold, when an in-kind distribution from the Giving Fund is requested, or upon notice of termination of the Giving Fund. All fees and interest must be paid in full by the Giving Fund or the donor prior to making a distribution or transfer from the Giving Fund.



# Record Keeping and Reporting

## FINANCIAL REPORTING

Haven Charitable will provide all financial reports or information required by law. In addition, Haven Charitable will provide advisors with quarterly statements, quarterly pool performance reports, and an annual report. Statements should be read carefully. Any error must be reported to Haven Charitable within 60 days of receipt.

## ACCESS TO REPORTS AND DOCUMENTS

Giving Fund statements are only available online on Haven Charitable's website at [www.havencharitable.org](http://www.havencharitable.org) in the advisor's account. In addition, all Program forms and documents necessary to open and administer the donor's Giving Fund are available as PDF files at [www.havencharitable.org/docs](http://www.havencharitable.org/docs).



# Legacy Options

## NAMING A SUCCESSOR

Primary advisors can select one or more of the legacy options regarding how their Giving Fund is administered after their lifetime by designating successors in their Successor Plan. These include individual successor(s), charitable organization successor(s) and the Endowment Program. Primary advisors can elect one successor option or any combination of the three.

Haven Charitable recommends that primary advisors regularly review successor information to ensure that it remains consistent with their wishes and to verify that contact information is still current.

Successor election(s) and recommendations can be changed by the primary advisor at any time during their lifetime, however primary advisors may not do so through any testamentary instrument, including through their will or instructions to an executor, and primary advisors may not name their estate as a successor. In addition, no unauthorized party, including an executor or individual successor, may access or receive a deceased primary advisor's personal information or transaction history with respect to the primary advisor's fund.

### OPTION 1: INDIVIDUAL SUCCESSOR(S)

Primary advisors may name one or more individual(s) who will assume all Giving Fund privileges upon their death. Each successor will be designated as a primary advisor on a new Giving Fund and can subsequently name their own successor(s). Primary advisors may name any individual(s) as successor(s). If the successor(s) is a minor, Haven Charitable will require that the grant recommendations be made in conjunction with a legal guardian. In addition, if a named successor advisor is not able or willing to serve, his or her portion will be allocated proportionally among the other named successor advisors' Giving Fund. If no other successor is named, the balance will be granted out in accordance with the Haven Charitable Giving Initiative. Please note that secondary advisors and professional advisors to the DAF account are not automatically successors to the account. If a primary advisor has named multiple successors, the new successor Giving Funds will be funded equally from the remaining Giving Fund balance at death unless otherwise specified.

Successor Giving Funds must be funded with a minimum of \$5,000. Successors with an allocated balance of less than \$5,000 will have the option of making additional contributions to reach the \$5,000 minimum within 12 months from the date of notification, or may recommend grants equal to the allocated balance within 90 days. If a successor fails to respond to the notification within 90 days, the balance will be granted out in accordance with the Haven's Giving Initiative.

### OPTION 2: CHARITABLE ORGANIZATION SUCCESSOR(S)

Primary advisors can designate one or more IRS-qualified public charities as the successor beneficiary of the Giving Fund. Upon the death of the primary advisor, and subject to approval by



Haven Charitable, any eligible grant recipient organization(s) will receive the remaining Giving Fund balance. If an organization is not an eligible grant recipient, the Giving Fund balance will be reallocated among the eligible grant recipients. If no other successor is named, the balance will be granted out in accordance with the Haven Charitable Giving Initiative. Charitable Organization Successors must be IRS-qualified public charities and are subject to review and approval by the Directors.

### OPTION 3: ENDOWMENT PROGRAM

The Endowment Program allows primary advisors to create a charitable giving plan that provides for recurring grants to charitable organizations beyond their lifetime. Primary advisors can recommend up to five IRS-qualified public charities for recurring grants as a percentage of the Giving Fund's balance. Primary advisors can update the successor plan and/or terms of the Endowment Program at any time by completing an Endowment Program Update Form.

Once a Giving Fund has entered the Endowment Program, all other advisors will be removed from the Giving Fund. All pending grants in the Giving Fund will be reviewed and, if qualified, processed accordingly. Any scheduled recurring grant(s) outside of the Endowment Program will be canceled.

Primary advisors can recommend up to five IRS-qualified public charities for recurring grants. Upon receipt of the Endowment Program Enrollment Form, Haven Charitable will review the recommended charitable grant recipients for eligibility. If any of the beneficiaries do not qualify to receive grants from Haven Charitable at the time of review, Haven will notify the primary advisor so that alternative grant recipient recommendations can be made at that time.

In addition, Haven Charitable will review each recipient at the time of the scheduled recurring grant under the Endowed Philanthropic Program to ensure that the charitable recipient remains qualified to receive grants from Haven Charitable. The grantmaking guidelines described on pages 14 through 17 apply to all grants from Haven Charitable. If an organization is ineligible to receive a grant from Haven Charitable, pursuant to the grantmaking guidelines, the portion of the Giving Fund balance designated for that beneficiary will be distributed to the remaining IRS-qualified public charities in the recommended proportions. If only one organization is named in the Endowed Philanthropic Program, Haven Charitable will distribute the grant to the alternative qualified charity successor, as recommended by the primary advisor in the Endowment Program Enrollment Form. If no alternative is named, the balance will be granted out in accordance with Haven's Giving Initiative (see page 26). In the event of changes in legal organization, status, or programs with respect to any proposed grant recipient, Haven Charitable will determine, in its sole discretion, whether and how grants under the Endowment Program should be made.

The Endowment Program requires a minimum total annual distribution amount of five percent (5%) of the Giving Fund balance. Annual distribution calculations are based on the Giving Fund balance as of December 31 of the prior calendar year.

Distributions of grants from the Endowment Program are distributable either annually or semi-annually on a recurring basis. Generally, grants will be distributed at the beginning of April and/or October. All recurring grants made through the Endowment Program must be distributed in the same month.



The Endowment Program permits anonymous grants subject to the grantmaking guidelines beginning on page 14. Primary advisors can choose which grants are anonymous and which are not. Anonymous gifts made through the Endowment Program will be identified as recommended by a Haven Charitable donor who wished to remain anonymous.

Primary advisors can recommend term durations for Endowment Program grants, with the minimum duration being five years. If the primary advisor recommends a specific term duration and there is a remaining balance in the Endowment Program at the end of that specified period, the balance will be granted to the recommended IRS-qualified public charities in the recommended proportions. Regardless of the recommended term duration, if at any time the Endowment Program balance drops below \$2,000, Haven Charitable reserves the right to grant the remaining balance to the recommended IRS-qualified public charities in the recommended proportion.

Grants from Haven Charitable through the Endowment Program will be made subject to all applicable laws and regulations. The Directors reserve the right to modify, amend and/or terminate the Endowment Program at any time.

## CONTRIBUTIONS TO THE ENDOWMENT PROGRAM

Irrevocable contributions from any person or entity, including estate gifts, appropriately designated to the Endowment Program Giving Fund, will be considered for acceptance by Haven Charitable after the Giving Fund has entered the Endowment Program.





## Haven Giving Initiative

The Haven Giving Initiative is a direct grantmaking program that supports the capacity and growth of tax-exempt charitable organizations. Funds for the Haven Giving Initiative are separate from donor contributions and are intended to engage Haven in direct philanthropy, as well as help support the operations and growth objectives of Haven Charitable. The Haven Giving Initiative will also be used by Haven to partner with other nob-profit organizations to help provide resources to charitable causes. Haven Charitable's Directors will review, select, and approve grants to charities and partnerships at their sole discretion.



## Service Providers

Haven Charitable was founded by Kingsly Capital, LLC as an independent, nonprofit, public charity in 2020. Although Kingsly may provide certain investment management and administrative services to Haven Charitable pursuant to a service agreement, Haven Charitable is not a program or activity of Kingsly.

Under the agreement, Haven Charitable pays a fee to Kingsly Partners LLC of 0.50% of the average quarterly assets of each individual Giving Fund or \$100 (\$500 for corporate Giving Accounts), whichever is greater, for a broad range of recordkeeping, fundraising, administrative, and other services. This fee is subject to further modifications for Giving Fund above certain sizes, as described under “Fees and Expenses” beginning on page 19. In addition, under the agreement, Haven Charitable reimburses Kingsly for certain other fees and expenses in connection with contributed property, as described under “Trading and liquidation fees” on page 19.



## Other Important Statements

### HAVEN CHARITABLE STRUCTURE AND GOVERNANCE

Haven Charitable's status as a tax-exempt charitable organization that is a public charity, as described in sections 501(c)(3), 509(a)(1) and 170(b)(1)(A)(vi) of the Code is pending.

Haven Charitable's staff, donors, and account advisors are subject not only to the policies and guidelines described here, but also to Haven Charitable's articles of incorporation, bylaws, and certain sections of the Internal Revenue Code. Haven Charitable is governed by a Board of Directors that maintains full discretion over the business and its programs, contributions, assets, investment allocations, and distributed grants. The role of Haven Charitable's Board of Directors is to govern the organization on behalf of its donors, advisors, and beneficiaries and to further the organization's charitable mission to increase philanthropy.

The Directors may adopt and change guidelines and policies, including those contained in these Guidelines, at any time, subject to the provisions of Haven Charitable's articles of incorporation and bylaws. The Directors may amend Haven Charitable's Articles of Incorporation and Bylaws consistent with Haven Charitable's status as a 501(c)(3) charity. Copies of the Articles of Incorporation and Bylaws are available upon request. Should the Directors determine that it is necessary to dissolve Haven Charitable, the Directors reserves the right to reassign assets held in funds to the Haven Giving Initiative and distribute its net assets to qualified charitable organizations. Under this highly unlikely circumstance, the Directors would attempt to notify investment advisors and account holders sufficiently in advance so they could recommend grants to specific public charities. The Directors make final grant determinations.

### LIMITATION OF LIABILITY

Haven Charitable will indemnify the Directors against any liability to the fullest extent allowed by law and may purchase insurance policies on behalf of Haven Charitable and its Directors. Haven Charitable will also indemnify and hold harmless investment advisers and administrative and recordkeeping service providers, their agents, and nominees from any claims, losses, liabilities, or expenses (including reasonable counsel fees and expenses), except those that may arise from gross negligence or willful misconduct in the performance of their duties.

### TERMINATION OF ADVISORY PRIVILEGES

The Board of Directors may terminate any privileges with respect to a Giving Fund or amounts held in the Giving Fund upon 60 day's written notice to a primary advisor at his or her last known US postal address associated with their Giving Fund.

### DISCLOSURE

**The Program Guidelines provide information that is general and educational in nature. It is not intended to be and should not be construed as legal or tax advice. Haven Charitable does not provide legal or tax advice. In compliance with IRS requirements, any information**



**contained herein is not intended or written to be used, and cannot be used, for the purpose of avoiding tax penalties under the Code. Content provided herein relates to taxation at the federal level only. Availability of certain federal income tax deductions may depend on whether you itemize deductions. Rules and regulations regarding deductions for charitable giving vary at the state level, and laws of a specific state or laws relevant to a particular situation may affect the applicability, accuracy or completeness of the information provided. Donors should consult an attorney or tax advisor regarding their specific situation.**

## MORE INFORMATION

Financial information about Haven Charitable can be obtained on our website at [www.havencharitable.org](http://www.havencharitable.org), or upon request.