

Dzokden Gift Acceptance Policy

At Dzokden, we warmly invite and deeply appreciate gifts that support our charitable, educational, and religious mission and reflect the values of our spiritual director, Shar Khenrül Rinpoche Jamphel Lodrö, and our vibrant community. Your generosity helps us fulfill our goal of creating a golden age of peace and harmony in the world through the teachings and practices of the Jonang Kalachakra, with a unique emphasis on rimé and Zhentong aspects.

This Gift Acceptance Policy (“Policy”) is designed to provide clarity and guidance for all those considering a gift to Dzokden—whether you are a prospective donor, one of our team members involved in gift solicitation, or an outside advisor assisting with gift planning. It outlines the types of gifts we accept, the standards that guide our decision-making, and who has the final authority in the acceptance process.

1. Key Principles of Our Policy

A. Commitment to Our Mission

Dzokden is dedicated to accepting gifts that support our mission and align with our values. This includes, but is not limited to, gifts that enhance our ability to spread the Jonang Kalachakra teachings and promote the well-being of our community.

B. Generosity in the Spirit of "Dana"

We encourage donations given in the true spirit of *dana*—generosity without expectation of return. Gifts should come from a place of heartfelt giving, with no additional conditions or expectations. When making a donation, we ask that donors do so in alignment with their own intentions and in the best interests of Dzokden. Under relevant tax law, Dzokden must provide a written disclosure statement to donors of a *quid pro quo contribution* in excess of \$75. No disclosure statement is required when the goods or services given to a donor meet the standards for insubstantial value. Dzokden will provide the donor with a gift acknowledgment with a statement that the organization did not provide more than insubstantial goods or services in return for the donation.

C. Types of Gifts We Accept

Dzokden gladly accepts a wide variety of gifts as long as the gift supports our mission and meets our acceptance guidelines. As a general rule, current gifts are encouraged in favor of deferred gifts. Similarly, Dzokden encourages unrestricted gifts, but recognizes the importance of restrictions to some donors in ensuring that their particular interests are supported and funded. Restricted gifts are, therefore, welcome, but only at specified funding levels and with the express understanding and agreement by the donor that Dzokden may use the funds as it deems appropriate if the donor’s particular interest is no longer viable. Unless otherwise specified, all gifts are considered *unrestricted*, meaning they may be used by Dzokden where most needed. If a gift is restricted, this must be clearly stated through a formal written agreement signed by both the donor and an authorized representative of Dzokden.

D. Standards for Acceptance

Gifts will be evaluated based on whether they are consistent with Dzokden's mission, values, and legal and ethical standards. We reserve the right to decline gifts that may harm the financial, legal, or ethical integrity of Dzokden, or compromise its reputation.

E. Refusal of Gifts

Dzokden reserves the right to refuse any gift that:

- i. Conflicts with our mission or values;
- ii. Introduces a conflict of interest;
- iii. Imposes prohibitive restrictions;
- iv. Exposes Dzokden to legal, financial, or reputational risk, as determined in Dzokden's discretion; or
- v. Violates any local, state, or federal laws.

F. Acceptance Conditions

Gifts will only be accepted if:

- i. The donor does not attempt to exert undue influence over Dzokden's operations nor distort Dzokden's programs in exchange for the gift;
- ii. They do not jeopardize the public's trust in Dzokden; and
- iii. They come from lawful sources.

G. Anonymity

We will honor donor requests for anonymity, provided such anonymity does not violate legal disclosure requirements. See Section 5 for more details on protecting anonymity.

H. Monetization and Disposal of Non-Cash Assets

Dzokden generally prefers to monetize and dispose of non-cash assets (e.g., securities, cryptocurrency, real estate) promptly to benefit from the value immediately, rather than holding onto the non-cash asset in its current form. We may refuse gifts with restrictions that prevent monetization.

I. Final Determination

The final decision on the acceptance of gifts is made by the appropriate representatives or leaders of Dzokden, in accordance with Article 2 below and the best interests of the organization.

2. Gift Acceptance Procedures

A. Level of Review. The following describes the requisite level of gift review, which depends on the type of gift and restrictions imposed on the gift:

- i. The Treasurer, their designee, or the Director of Finance will review and determine whether Dzokden will accept gifts that are unrestricted, subject only to an endowment restriction, or restricted only to be used for a purpose previously approved by the Board of Directors (the "Board") and which consist of cash, cryptocurrency, or publicly traded securities with a value of up to \$100,000, or tangible property with a value of up to \$25,000.

ii. Unless approval of the Board is required by the following paragraph, the Treasurer or their designee will review and determine whether Dzokden will accept the following types of gifts:

- gifts of more than \$100,000; and
- gifts of tangible property with an estimated value of more than \$25,000. iii. The

Board will review and determine whether Dzokden will accept the following types of proposed gifts:

- gifts that include a restriction that would require Dzokden to conduct a major program or activity that the Board has not previously approved or that is inconsistent with Dzokden's current activities and/or mission;
- gifts that may require Dzokden to make an unusually large financial commitment or expenditure;
- gifts of real estate or business interests;
- gifts that another section of this Policy requires the Board to review;
- gifts referred to the Board by the Director of Finance or that the Board decides to review in its discretion; and
- types of gifts not otherwise addressed by this Section 2.A.

B. Review Procedure

The Board or Director of Finance, as applicable, will review proposed gifts using publicly available information and information received from the prospective donor to determine, with third-party legal or accounting advice when appropriate, whether the gift complies with this Policy's principles and standards. This review will be conducted prior to solicitation of the donor, or prior to acceptance for unsolicited gifts. If the Board, Treasurer, or Director of Finance determines to accept a gift, its decision will be communicated to the President within one week of being asked to review the gift or within a longer reasonable time period upon notice to the President. In a case where the gift is rejected, the donor will be informed of the decision by the Treasurer. If the Director of Finance rejects a gift, the Treasurer will inform the Board and include the reason for rejection.

C. Recordkeeping

All decisions, consultations, and notifications regarding gift acceptance will be documented digitally to a degree of detail appropriate to the magnitude of the gifts, and such information must be maintained in Dzokden's records and accessible to the Board, to the extent required under state law.

3. Current Gift Options. The following describes the gift options available. All donors are encouraged to seek the assistance of independent and personal legal and tax advisors regarding any potential tax and estate planning consequences before making a gift to Dzokden. When appropriate, Dzokden will seek the advice of legal counsel in matters relating to the acceptance of any proposed gift. Dzokden does not provide tax or estate-planning advice, but in appropriate cases will execute documentation to evidence a charitable gift (such as an IRS Form 8283 and 8282). For example, it is the donor's responsibility to determine if it is necessary to obtain an appraisal of a proposed gift and, if so, to secure such appraisal. Expenses incurred while obtaining an appraisal shall be the responsibility of the donor.

A. Cash

- i. Any amount is encouraged and welcome.
- ii. While unrestricted contributions are encouraged, any donor has the option to restrict some or all of his or her gift to a specific program or use, based on approval by Dzokden, when the gift exceeds \$10,000.

B. Marketable Securities

- i. Any amount is encouraged and welcome.
- ii. While unrestricted contributions are encouraged, any donor has the option to restrict some or all of his or her gift to a specific program, project or use, based on approval by Dzokden, when the fair market value of the stock exceeds \$10,000.
- iii. If an endorsed stock certificate, or an unendorsed stock certificate with a stock power, is mailed to Dzokden or Dzokden's agent, the gift date is the date of mailing. If it is hand delivered to Dzokden, the date of the gift is the date of delivery. If the donor delivers his stock certificate to his or her bank or broker, or to the issuing corporation, for transfer into Dzokden's name, the date of the gift is the date on which the transfer is made on the corporation's books.

C. Closely-Held Stock

- i. Any amount is welcome, provided the stock may be readily sold or is likely to be redeemed.
- ii. While unrestricted contributions are encouraged, any donor has the option to restrict some or all of his or her gift to a specific program, project or use, based on approval by Dzokden, when the fair market value of the securities exceeds \$10,000.

D. Insurance

- i. The assignment of an existing life insurance policy in any amount is welcome, as is naming Dzokden as the irrevocable beneficiary of the policy or purchasing a policy in the name of Dzokden.
- ii. If the face amount of the policy exceeds \$10,000, the donor may specify that all the proceeds be restricted to a specific program, project, or use, based on approval by Dzokden. This restriction shall be made in a separate written agreement between Dzokden and the donor and attached to the policy.
- iii. Dzokden may consider gifts of life insurance policies if the following conditions are met: (1) policies must be paid in full; (2) the donor shall provide the complete life insurance contract; (3) there are no outstanding policy loans; and (4) Dzokden is designated as the owner of the policy (by absolute assignment or change of ownership) and, as a result, neither the donor nor any other party retains any incident of ownership over the policy.
- iv. Dzokden also should be designated as the beneficiary of the policy.
- v. Dzokden will value gifts of insurance interests for its own accounting and other purposes, and will only acknowledge receipt of the assets to the donor by description, not value. Dzokden may inquire of the donor what value it places on these gifts.

E. Tangible Personal Property

- i. Gifts of tangible personal property, such as artwork, books, and antiques, are welcome, they may be accepted after review and approval by the Board and may be used, or readily sold, by Dzokden.
- ii. Dzokden shall make an individual determination regarding whether or not to sell each gift of tangible personal property received by Dzokden to determine whether the gift may be used by Dzokden in furtherance of its charitable, educational, and religious mission. Such review shall include an analysis of whether retaining the gift requires allocation of Dzokden resources (e.g., special facilities or security) and such retention must be approved by the Board regardless of the gift's estimated value.

F. Real Estate

- i. Gifts of real estate, whether improved or unimproved, may be accepted only after review and approval by the Board. Generally, gifts of realty may be accepted from donors in many countries, but the property may be sold. A gift of realty subject to a mortgage may be accepted only after review and approval by the Board. Gifts of timeshares, ground rents, and burial lots will not be accepted. Gifts of realty subject to a life estate may be accepted on a case-by-case basis.
- ii. Dzokden may dispose of all gifts of real estate as expeditiously as possible, or keep it. At a minimum, gifts of real estate require: (1) a title insurance commitment showing marketable title in the name of the donor, free and clear of unacceptable encumbrances, issued by a reputable title insurance company; (2) an appraisal (not older than 60 days) by a qualified appraiser; (3) a Phase I environmental audit by a qualified engineer indicating that ownership will not expose Dzokden to environmental liability; (4) a market feasibility study for purposes of liquidation; (5) an on-site evaluation by a member of the Board (or if the property is located in a geographically isolated area, a local real estate broker); (6) a structural engineering report (where appropriate); (7) a review of leases (for commercial property); (8) evidence of compliance with the Americans with Disabilities Act (where applicable); and (9) a disclosure statement reflecting any and all carrying costs, including but not limited to taxes, insurance, association dues, membership fees, and transfer charges.
- iii. Unless waived by the Board, the donor will be responsible for all costs related to the environmental impact study, title search, marketability study, and any other related study, as well as the costs associated with conveyance and delivery of the gift.
- iv. Dzokden will value gifts of realty for its own accounting and other purposes and will only acknowledge receipt of the assets to the donor by description, not value. Dzokden may inquire of the donor what value it places on these gifts.
- v. Dzokden may enter into bargain sales that are consistent with its mission. In a bargain sale, Dzokden purchases property from a seller/donor at a discounted price and simultaneously accepts as a gift from the seller/donor the amount of the discount.

G. Retirement Benefits

- i. Donors are encouraged to name Dzokden as a beneficiary of their retirement plans. Dzokden should obtain a copy of the executed designation form that the donor has submitted to the retirement plan administrator, naming Dzokden as a beneficiary.

4. Standard of Conduct

Dzokden abides by the Association of Fundraising Professionals Donor's Bill of Rights. Dzokden staff and Board members are required to uphold the Dzokden Code of Conduct, which includes:

A. No Personal Benefit

No Dzokden director, officer, leader, or staff may benefit personally from gifts. **B. Avoid Conflicts of Interest**

No Dzokden director, officer, leader, or staff may participate in gift solicitation or negotiations if it could result in an actual or perceived conflict of interest, unless reviewed and approved by the Board pursuant to Dzokden's Conflict of Interest Policy. **C. No Finder's Fees.**

Dzokden does not pay finder's fees for acquiring gifts.

We will not knowingly accept gifts that would result in unethical or illegal advantages for the donor or any third party.

5. Donor Privacy and Confidentiality

Dzokden is committed to respecting donor privacy and confidentiality for those who wish to give anonymously. We will make all reasonable efforts to honor the donor's wishes regarding anonymity and will make every effort to only disclose information when required by law. Any intentional violation of donor confidentiality will be subject to disciplinary action.

6. Policy Review

The Director of Finance or the Treasurer will periodically review this Policy and propose updates to the Treasurer and Board as necessary to ensure it remains aligned with Dzokden's mission and legal requirements. Any proposed update shall be approved by the Board.

This version was approved by the Dzokden Board on April 6, 2025