UNITEDHEALTHCARE CHILDREN'S FOUNDATION, INC.

Gift Acceptance Policies and Guidelines

**November \_\_\_, 2023**

UnitedHealthcare Children's Foundation, Inc. (the "Foundation") is a tax-exempt 501 (c)(3) public charity, which is funded by contributions from UnitedHealth Group Incorporated, its affiliates and employees, as well as by other individuals, corporations and members of the general public. The Foundation was formed to improve the lives of children who need financial assistance to cover necessary medical treatment.

1. Purpose of Policies and Guidelines

Donors have the opportunity to make gifts to the Foundation in any manner that furthers the donor's philanthropic goals while also remaining consistent with the terms of this Policy as well as the Foundation’s mission and the fiscal and legal integrity of the Foundation. The Foundation is committed to seeking such gifts from individuals, corporations, and foundations to secure the future growth and mission of the Foundation and to provide adequate resources for full and effective programs. These policies and guidelines govern the acceptance of gifts by the Foundation and provide guidance to prospective donors and their advisors when making gifts to the Foundation. The provisions of these policies shall apply to all gifts received by the Foundation for any of its programs or services.

1. Ethics in Receiving Gifts

Gifts to the Foundation may only be accepted where there is: (1) genuine donative intent, (2) full disclosure and agreement between the donor and the Foundation about the nature of the gift and any conditions placed thereon by the donor, and (3) the gift furthers the mission of the Foundation. During gift solicitation and acceptance, it is vital that the Foundation's tax-exempt status be maintained and protected. Gift requirements must support the Foundation's mission, and any restricted use stipulated for a gift must be consistent with prevailing laws and public policies. The Foundation shall not accept any gifts that would jeopardize the financial, legal, or moral integrity or reputation of the Foundation, or that would be inconsistent with the Foundation's mission, purposes, and priorities.

1. Categories of Gifts

The Foundation divides gifts into the following five (5) broad categories and sets forth the criteria for accepting each type of gift. That said, the provisions contained in this Section C do not preclude the Board from determining on a case-by-case basis to accept or decline gifts that may or may not fall into the categories specifically mentioned below. Donors who intend to give gifts that are not in the form of cash or securities may be advised to contribute through a donor-advised fund or other third-party.

1. **Cash:** The Foundation may accept gifts of official United States currency, which may be paid by cash, credit card, or a check in any amount. In order to ensure prudent financial controls and compliance with IRS receipting requirements, gifts of $250 or more should be given in forms other than cash (e.g., checks, money orders, wire transfers). Checks or money orders should be made payable to “The UnitedHealthcare Children’s Foundation, Inc.,” or to “UHCCF” and should properly identify the donor or donors and be delivered to The Foundation’s offices. Wire and electronic fund transfers can be arranged with The Foundation’s Chief Executive Officer or the Chief Executive Officer’s designee.
2. **Securities**:
	1. Publicly Traded Securities. The Foundation may accept all gifts of securities that are traded on a United States stock exchange (e.g., the New York Stock Exchange) or other publicly reported market and on which there are no restrictions hindering subsequent sale of the securities. Upon request, the donor will provide a certification that there are no encumbrances or claims by a third party. Employees, agents or volunteers of the Foundation may not represent to a donor that a particular security will be held for investment unless this arrangement has been approved in advance by the Board of Directors or its designee.
	2. Closely Held Securities: Closely held securities (e.g., debt or interests in privately-held companies) may be accepted subject to the approval of the Board of Directors. When reviewing such gifts, the Board should consider: (i) whether there are restrictions on the security that would prevent its conversion to cash; (ii) the marketability of the security and (iii) whether acceptance of the security might have undesirable tax implications for the Foundation. Closely-held securities shall be converted to cash as soon as reasonably practicable absent compelling reasons to delay.

1. **Estate and Legacy Gifts**: Estate gifts are generally arranged during the donor’s lifetime, with the transfer of assets taking place after the donor’s death. When practical, any estate gift that would require approval of the transfer of the asset should be reviewed and approved by the Foundation prior to the commitment being ﬁnalized. Donors are advised to consult with the Foundation regarding how to designate the gift and additional criteria that may apply if the assets to be contributed are in non-cash form.Donors are also encouraged to notify the Foundation when considering a legacy gift (i.e., a gift made in the donor’s will, revocable trust, or a similar estate planning document that effects a transfer at death) in order to ensure that it meets the criteria set forth in this Policy.

The Foundation will accept any funds that it receives as a designated beneﬁciary (or an alternate beneﬁciary) of a life insurance policy, a deferred annuity contract, an IRA, a deﬁned beneﬁt plan, a 401(k) plan, a deﬁned contribution (proﬁt-sharing) plan, or other qualiﬁed plan, unless the designation imposes restrictions or a trust arrangement, in which case prior review and approval by the Foundation is required. The Foundation will accept beneﬁcial interest in an insurance policy without minimum but reserves the right to decline to pursue receipt of funds offered under such interest if it proves administratively burdensome.

1. **Goods and Services**: Gifts of tangible personal property (e.g., teddy bears, equipment or supplies for events, airplane tickets and concert tickets), real property (e.g., use of a cabin) and services (e.g., a hosted wine tasting event or professional services such as event photography) should be evaluated on a case by case basis to assure that the item furthers the Foundation’s mission and isn’t accompanied by undue carrying costs, potential liabilities or restrictions. When there is a trip or other special event donated the fair market value and the charitable contribution amount for each participant will be stated specifically in the promotional literature and donor acknowledgement letter. Donations given to offset the costs of a special event must be recorded as gift income rather than as a credit to an expense account.
2. **Other Gifts**: Other gifts, including gifts of nontraditional assets, may carry additional risks and costs to both the donor and the Foundation. The Board of Directors reserves the right to consider whether the acceptance of such gifts aligns with the Foundation’s mission and policy.

D. Restricted Gifts

The Foundation generally cannot accept gifts that are accompanied by a firm restriction by the donor to be used for a specific purpose or for grants to children with a specific condition. Donors are welcome to indicate their preferences when making the gift, but all gifts should be assumed to be given with the understanding that they will be used consistent with the Foundation’s mission and charitable purpose. To the extent that there is a restrictive gift offered that warrants consideration of a potential exception to this standard, the Board and the President shall consider and decide upon those matters on a case-by-case basis.

1. Valuing Gifts

The law does not require the Foundation to put a value on non-cash property received when substantiating receipt of the gift. Full responsibility rests on the donor for claiming any deductions including filing Form 8283 (for all non-cash gifts of more than $500), and any appraisals or other documentation.

1. Authority to Negotiate

This Board authorizes the President and his or her delegates to negotiate on behalf of the Foundation with respect to all acceptable gifts.

1. Independent Legal/Tax Advice

If initial review of an offered donation raises any concerns, further review and recommendation by an outside professional (e.g., legal counsel) may be sought by the Board or the President before making a final decision on acceptance of the gift. Donors would also be wise to secure the advice of independent legal and/or tax counsel as well as speak with financial advisors in matters relating to their gifts. The Foundation will not provide advice to donors about the tax or legal implications or other treatment of gifts. Communications aimed at donors, including but not limited to brochures and the Foundation website, should contain express language to this effect.