

# TrustBridge Contribution Policy

## Introduction

TrustBridge Global Foundation (“TrustBridge”) exists to mobilize resources by making global giving easy so that charities everywhere have all they need to accomplish their mission. This policy governs the acceptance, processing, and stewardship of contributions in compliance with Swiss charity law (notably the Swiss Civil Code and Swiss anti-money laundering regulations), while ensuring operational alignment with international best practices and ethical standards.

TrustBridge accepts gifts for the advancement of its charitable objectives and those of its charitable partners. All contributions are received with an expectation of charitable intent and will be administered in accordance with applicable laws, regulations, and TrustBridge’s governing instruments.

## Eligible Givers and Contribution Responsibility

### Eligible Givers

Gifts may be made by any legal person or entity, including:

- Individuals
- For-profit and non-profit corporations
- Foundations and donor-advised funds
- Partnerships (general and limited)
- Trusts and estates
- Legal entities such as GmbHs, SRLs, and SAs





## Donor Responsibilities

Givers are responsible for:

- Valuation of the gift under the relevant jurisdictional laws
- Ensuring the gift aligns with their legal and tax obligations
- Notifying TrustBridge if contributing testamentary assets, restricted assets, or complex non-liquid gifts
- Obtaining and retaining any required third-party valuations or appraisals for complex asset gifts (e.g., business interests, real estate, privately held securities) that may be needed for the donor's own tax reporting or compliance requirements

## Types of Gifts Accepted

TrustBridge may accept the following types of gifts, subject to due diligence and approval:

### Cash Gifts

Accepted in multiple currencies via:

- Bank wire
- Credit card
- Other bank transfers (e.g., SEPA)
- Money order (where applicable and accepted by participating network members)
- Check (where applicable and accepted by participating Network Members)

Minimum contribution assessments may apply depending on geography. For example, CHF 150 or equivalent in local currency may be assessed in specific regions due to regulatory complexity.

### Publicly Traded Securities

- Must be received into TrustBridge's brokerage account in good order
- Typically liquidated the next business day
- Thinly traded, restricted, or illiquid securities require pre-approval and may involve longer settlement

## Default Policy on Liquidation:

Unless prior arrangements have been specifically requested by the donor and agreed to in writing by TrustBridge, all marketable securities will be liquidated immediately upon receipt, and the resulting cash proceeds, net of transaction assessments, will be allocated to the donor-recommended fund.

## Asset-Based, Non-Liquid, and Complex Gifts

Examples include:

- Privately held corporate stock
- Restricted or non-public securities
- Real estate (developed/undeveloped)
- Art, collectibles, tangible personal property
- Royalties, copyrights, patents
- Life insurance (all forms)
- Loan notes or receivables

Prior to acceptance, these gifts must undergo a formal **Ministry Acceptance Evaluation**, which determines:

- Legal structure and transferability
- Reputational or regulatory risk
- Fair market valuation and liquidity
- Tax implications for both TrustBridge and the donor
- Projected management burden and administrative costs

## Market Liquidity Considerations:

TrustBridge reserves the right to delay liquidation or execute the transaction in tranches in order to prevent market disruption. The timing and method of liquidation will be at TrustBridge's sole discretion, taking into account prevailing market conditions, volatility, and liquidity risk.

All non-liquid gifts require internal approval through a defined risk and impact evaluation process, following the Swiss Code of Obligations and stewardship principles.

Gifts involving non-liquid or complex assets, including business interests, closely held entities, and real estate, may be accepted by TrustBridge on a case-by-case basis.

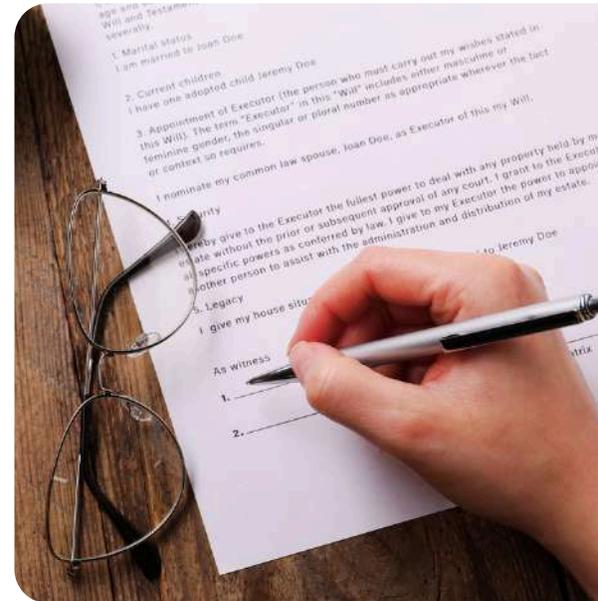
Acceptance of these assets is subject to written agreement between TrustBridge and the donor and may involve cost recovery arrangements or the use of special-purpose entities. TrustBridge reserves the right to delay liquidation or execute transactions in a manner that avoids market disruption for thinly traded assets.

TrustBridge reserves the right to decline any gift that, in its sole discretion, presents unacceptable legal, financial, or ethical risks.

# Testamentary and Deferred Gifts

TrustBridge accepts bequests and estate-related gifts via:

- Wills and trusts
- Bank and brokerage account beneficiary designation, including retirement accounts (if permitted)
- Life insurance policies
- Payable/transfer-on-death designations
- Charitable gift annuities or remainder trusts (via our U.S. Network Member only)
- Other asset-based gifts



TrustBridge will only initiate grantmaking after the estate settles and when it is reasonably confident there is no material risk or pending litigation.

All testamentary gifts should use the following designation language:

“To TrustBridge Global Foundation, a charitable, non-profit *Stiftung* organized under the laws of Switzerland, subject to its governing instruments, policies, and procedures, as amended from time to time.”



## Gift Refusal, Return, or Suspension

TrustBridge may refuse, return, or suspend a gift under the following conditions:

- Known or suspected illegal origin (fraud, bribery, terrorism, money laundering)
- Associated reputational risk or ethical concerns
- Gift conditions conflict with TrustBridge’s charitable objectives or public benefit purpose
- Asset may be connected to known or latent liabilities
- Conflicts with regulatory or donor-advised fund restrictions (e.g., impermissible private benefit or excessive donor control)

# Cryptocurrency

TrustBridge collaborates with various Network Members to facilitate contributions made in cryptocurrency. Donors choosing to contribute in this form acknowledge that their donation will be processed through the applicable Network Member, and therefore, the donation will be subject to the rules, terms, and conditions of that Network Member.



## Due Diligence and Regulatory Compliance

### Anti-Money Laundering (AML)

In accordance with Swiss AML law and FINMA guidelines, TrustBridge applies a risk-based KYC approach, particularly for:

- One-time large donations (>CHF 20,000), especially with new givers with no prior relationship
- Politically Exposed Persons (PEPs)
- Gifts from high-risk jurisdictions or known terrorist hotspots
- Donations from a single donor that exceed CHF 100,000 in a calendar year

TrustBridge's AML/KYC Policy includes the following measures:

#### ✓ Client Identification and Verification

Donors holding Foundation Funds, large amount donors (LADs), and charity leaders (CLs) must provide identification documentation including passport, government-issued ID, or legal incorporation documents.

#### ✓ Sanctions and PEP Screening

Clients are screened against sanctions and PEP lists through Dun & Bradstreet Restricted Party Screening.

#### ✓ Ongoing Due Diligence

TrustBridge monitors transactions regularly to detect and investigate unusual patterns. Clients may be asked to re-verify identity or provide additional documentation.

### ✓ Enhanced Due Diligence (EDD)

High-risk clients, including PEPs, complex organizational structures, or jurisdictions with poor transparency, will be subject to EDD involving deeper vetting, documentation, including Source of Funds declaration, and potential field investigation.

### ✓ Beneficial Ownership

TrustBridge identifies and verifies the natural persons who ultimately own or control more than 25% of an entity involved in a transaction.

### ✓ Recordkeeping

All AML/KYC documentation and verification activities are retained for a minimum of five years post-fund closure.

Failure to meet KYC verification requirements may result in delayed fund activation, suspended disbursements, or rejected contributions. TrustBridge retains the right to decline organizational relationships where it cannot establish a reasonable belief in the client's identity or funding legitimacy.

## Recordkeeping

TrustBridge maintains documentation for all gifts, including:

- Receipts for gifts over CHF 100
- Detailed descriptions for asset-based gifts
- Signed Donation Agreements or other Donation Contracts (where applicable)
- Donor communications and instructions

## Receipting and Acknowledgement

### Contribution Clearing and Posting

Contributions are posted to donor-recommended funds following the successful clearing of the transaction:

- Wire Transfers: Posted within 3 business days of funds being received by TrustBridge's bank
- Credit Card Contributions: Posted when cleared by the processing company, typically within 3 business days
- Other Bank Transfers: Subject to a 7-calendar day clearing hold before being posted

TrustBridge reserves the right to place a discretionary hold on any contribution when additional due diligence or verification is required, or when fund instructions are incomplete.

TrustBridge will issue a formal receipt for each eligible contribution in accordance with Swiss regulations and international best practices.

Receipts include:

- Date of receipt by TrustBridge
- Description of the asset (cash, securities, crypto, etc.)
- Donor name (as per instrument of transfer)
- Amount (for cash gifts) or declared value (for non-cash gifts, as substantiated by the donor)

## Contributions Without Recommendations

If a contribution is received by TrustBridge without a donor recommendation or designation, the contribution will be allocated to the TrustBridge Unknown Giver Fund. TrustBridge will make best efforts to identify and contact the donor using any available information or transactional metadata.

If the donor provides instructions, the funds will be allocated accordingly. If no contact is established or instructions received within a twelve-month period, the contribution will be transferred to TrustBridge's operational accounts and used at the discretion of the Foundation to support charitable initiatives in accordance with its public benefit objectives and applicable law.

## Important Note on Receipt Dates

Receipts will be dated **only on the day the gift is received into TrustBridge's account**, not on the date the donor initiates the transaction. For example, if a donor initiates a stock transfer on **December 31**, but the shares are not received in TrustBridge's brokerage account until **January 4**, the receipt will reflect **January 4** as the official contribution date.

This timing distinction is particularly relevant for donors intending to claim charitable deductions based on calendar-year giving. Donors are advised to initiate contributions well in advance of year-end deadlines if they wish to ensure receipting within a given tax year.

## Receipts for Smaller Gifts

While TrustBridge generally provides receipts for gifts over CHF 100 (or equivalent), if a donor has supplied a valid email address, TrustBridge will also issue receipts for contributions below this threshold electronically.

TrustBridge is not responsible for processing delays caused by intermediary banks, custodians, or market holidays, and cannot retroactively alter gift receipt dates to accommodate tax planning purposes.

# Cost Recovery and Fund Assessments

Applicable administrative costs may be assessed based on:

- Fund size and balance
- Asset type and complexity
- Investment management requirements
- Legal, tax, and liquidation costs

TrustBridge will recover third-party costs from gifted assets where possible. Exceptions or custom arrangements may be approved by leadership.



The SVP of Operations & Philanthropy shall ensure adherence and will report material deviations, breaches, or incidents.

## Modifications and Oversight

This policy may be amended by the Board of Trustees of TrustBridge Global Foundation as needed to:

- Align with updated Swiss legal standards
- Reflect evolving risk landscapes
- Maintain harmonization across the broader TrustBridge network



**Prepared by:** Tricia Collins, SVP, Operations & Philanthropy

**Review cycle:** Annually or as required by regulatory change

**Last Reviewed:** August 2025