

Charitable Gift Funds Canada Foundation

Granting Policy

Charitable Gift Funds Canada Foundation/Fonds de Bienfaisance Canada (“GFC”) is a corporation governed by the *Canada Not-for-Profit Corporations Act* (the “CNCA”) and registered public foundation (*charitable reg # 89671 3500 RR0001*)

GFC is governed by an independent volunteer Board of Directors (the “Board”) made up of individual directors.

Purpose and Scope:

The purpose of this policy is to support GFC in the fulfillment of its charitable purposes, mission and vision. This policy is intended to ensure that the activities of GFC meet the best standards in the charitable sector so that public trust in the excellence and integrity of GFC is maintained.

The Granting Policy is intended to outline GFC’s general policies on grants, grant disbursements, legacy grant management and the conditions under which all grant disbursements recommendations will be made and / or considered by GFC.

Guiding Principles:

GFC’s granting decisions will be guided by the following criteria:

- 1. Legality:** ensuring that all decisions conform to all legal and regulatory requirements of directors including their duties under the CNCA, and of charities including alignment with CRA Guidelines and the Income Tax Act (the “Act”).
- 2. Consistency:** ensuring that all decisions advance the charitable purposes of GFC and are considered under similar conditions and processes.
- 3. Reputation:** Ensuring that no decision will, or will have the potential to, bring harm to the reputation of GFC or its charitable status.
- 4. Governance:** All donations and assets are owned by GFC and grant recommendations are submitted from founding donor(s) (or others with advisory rights as stated in the program guide), with each grant recommendation being reviewed by staff and approved by the Board. Where GFC is named as fund successor for estate gifted assets, all granting recommendations are at the approval of the Board.

Qualified Donees:

Grants will only be made to qualified donees as defined in the Act, as listed on the CRA Charities Directorate listing, and consistent with GFC's defined charitable purposes.

Disbursement Quota Obligations:

Grants and grant disbursements from GFC's assets will be made at least to the extent necessary to satisfy GFC's mandatory minimum annual disbursement quota obligations, as set out in the Act.

Grant Recommendations:

In submitting grant recommendations for assets within a charitable gift fund, the Board will consider grant recommendations from the founding donor(s), fund successor(s) when active in that role, legacy intentions on file, or other named entity with grant advisory rights on behalf of that specific charitable gift fund.

If GFC has not received acceptable grant recommendations from the founding donor(s), fund successor(s) when active in that role (if named), a completed legacy intention document or named entity with grant advisory rights, then the Board reserves the right to make a grant disbursement(s) from that charitable gift fund.

GFC will generally accept grant recommendations that meet the following criteria:

- a. The recommended grant recipient is an eligible qualified donee as defined in the Act and is on the CRA Charities Directorate listing as a qualified donee in good standing.
- b. The eligible qualified donee is not restricted from receiving a grant under any Canadian criminal, anti-money laundering and/or anti-terrorism law.
- c. The founding donor(s), fund successor(s) when active in that role, legacy intention document or entity with grant advisor rights submitting the grant recommendation for a charitable gift fund has confirmed that:
 - i. no person who has advisory rights on the charitable gift fund, or any person not at arm's length with such person, will derive any personal benefit from a grant to the qualified donee; and
 - ii. the grant disbursement does not satisfy a pre-existing personal pledge;

- d. That there are sufficient grantable assets in the charitable gift fund available for disbursement at the time that the grant disbursement recommendation has been submitted.
- e. Such other criteria that GFC in its sole discretion may establish from time to time.

Grant Approval and Disbursement:

All grants and grant disbursement recommendations shall be approved by the Board on a frequency determined by the Board and GFC Senior Management. The Board may determine a schedule of grant dates and deadlines for accepting grant recommendations.

Anonymity and naming recognition:

GFC respects all donors' wishes for anonymity, where possible. Under the law, however, GFC may be legally required to disclose the identity of the donor and/or the charitable gift fund from which assets were disbursed and therefore retains the right to do so.

Donors may advise how they wish grants to be acknowledged by completing and submitting a Grant Recommendation Form.

Amendment and Review:

This policy shall be reviewed and, if necessary, amended by the Board no less than every three years.

Approved 18 October 2023.