

## Gift acceptance policy

Version 2 – June 2025

**Purpose:** This policy establishes guidelines for accepting gifts to ensure they align with IMPACT's mission, values, Code of Conduct, policies and ethical standards. This policy ensures that all gifts are managed ethically, transparently, and in compliance with legal requirements.

### Types of acceptable gifts:

- Cash, checks, and electronic fund transfers
- Publicly traded securities
- Bequests and planned gifts
- Restricted gifts: Gifts with specific conditions or restrictions set by the donor.

### Gift acceptance criteria:

- Gifts must align with the mission and values of IMPACT Initiatives. Our organization adheres to a strict [code of conduct](#) and guiding policies, including [our anti-terrorism policy](#). These policies are available for review on our [website](#).
- Gifts must not create conflicts of interest or impose undue burdens on the organization. Any potential conflicts of interest related to gift acceptance will be identified and managed in accordance with [our conflict of interest policy](#).
- All gifts must comply with relevant laws and regulations.
- Donations are subject to our acceptance. We reserve the right to refuse or return any donation at our discretion.

Note - IMPACT will not accept gifts that, in the judgment of the organisation:

- Violate the terms of IMPACT's Code of Conduct and guiding policies;
- Violate a federal, state, or other law;
- Are too difficult or expensive to prudently accept and/or administer;
- Were acquired by other than legal means, or that clear title to the donated asset does not flow directly from the donor to IMPACT;
- Are too restrictive in purpose, or compromise IMPACT's capacity to manage the donation in line with its policies, mission and/or organisational strategy
- Could create unacceptable liability or cause IMPACT to incur future unanticipated or anticipated expenses;
- Are for purposes that do not align with IMPACT's mission;
- Include conditions that compromise IMPACT's independence, neutrality, or ability to fulfill its mission.
- Pose a significant reputational risk to IMPACT Initiatives, including associations with unethical, illegal, or controversial activities.

The acceptance of a gift does not imply nor mean that IMPACT endorses or approves of the donor's views, opinions, businesses, or other activities.

### Donor screening

This is a range of practical steps that need to be taken by IMPACT Initiatives to be assured of the source of philanthropic funds. This process is necessary to ensure that IMPACT Initiatives is confident that it knows its Donor, thereby enabling it to identify and manage associated risks. The gift acceptance policy requires checks to be conducted on the qualifying gifts from any Donor that gives money or provides in-kind support to IMPACT Initiatives. Clarity on the Donor identity and source of funds used for the donation is an important part of IMPACT Initiatives' oversight and essential to safeguarding the organization's reputation. Similarly, understanding potential reputational and financial risks associated with illegal or otherwise nefarious activities of proposed corporate and/or individual partners is necessary to protect the integrity of the organization.

### Process:

- Gifts up to 10,000 CHF may be accepted without prior approval. IMPACT reserves the right to screen any individual and corporate donors for donations below 10,000 CHF, should circumstances require so.
- All individual and corporate donors for donations above 10,000 CHF will be screened to ensure the donor's activities align with our code of conduct and policies, in compliance with IMPACT's anti-terrorism screening process.
- IMPACT will use the information provided in the donation form to screen donors against sanction lists, in compliance with Swiss law and our anti-terrorism policy.
- Gifts exceeding 10,000 CHF require review and approval by the CEO and gift exceeding 50,000 CHF require approval from the Committee.

- Gifts will not be accepted from donors engaged in activities that contradict our mission or values, in line with the gift acceptance criteria section.
- Appropriate tax receipts will be issued for all eligible gifts, in accordance with Swiss tax laws.

### **Gift acceptance conditions:**

After these checks, the acceptance of all contributions is subject to the following conditions:

- The acceptance of a contribution does not constitute endorsement by IMPACT Initiatives of the Donors or its related services unless otherwise agreed in writing.
- The acceptance of a contribution does not confer on the Donor any privilege or advantage.
- The acceptance of a contribution as such does not offer the Donor any possibility for advising, influencing, participating in, or being in command of the management or implementation of strategic or operational activities.
- IMPACT Initiatives keeps its discretionary right to decline or return a contribution, without any further explanation.
- In case of a confirmed conflict of interest, any offer of a gift can be (i) directed from "non-earmarked" to "earmarked" funds for a particular program that is not conflicted, as long as all other requirements are met, or (ii) IMPACT Initiatives can reject the gift without any further explanation.

### **Designated donations and allocation flexibility**

As IMPACT Initiatives operates in over 30 countries, we are committed to honoring donor intent while upholding the humanitarian imperative to respond where needs are greatest. When a donation is designated for a specific crisis or country, we guarantee that **at least 60%** of the contribution will be allocated directly to activities in that context. The remaining portion will be used to cover costs necessary to enable our crises response work, such as emergency preparedness, research quality assurance, maintaining compliance processes and strengthening organisational resilience to respond. This ensures that we maintain the agility and responsiveness essential to our mission. This approach allows us to balance targeted support with the broader responsibility of strengthening our organisational capacity to address critical gaps in humanitarian data and analysis across diverse operational settings.

### **Gift recognition:**

For reasons of transparency, IMPACT initiatives shall normally publicly acknowledge all philanthropic contributions and engagements unless the Donor specifically requests anonymity. A truly anonymous donation, in which IMPACT initiatives's fundraising unit only deals with an intermediary who is not willing to identify the Donor, will not be accepted. A donor can request to remain anonymous as long as his/her identity is known to IMPACT initiatives and subject to donor screening checks.

This policy will be reviewed regularly to ensure it remains relevant and effective.

**Contact information:** IMPACT is located at International Environment House 2, 9 Chemin de Ballexert, 1219 Geneva, Switzerland Tel: +41-225-66-29-63 Email: [geneva@impact-initiatives.org](mailto:geneva@impact-initiatives.org)

Our donor service is at your disposal to answer all your questions. Do not hesitate to contact us: [donations@impact-initiatives.org](mailto:donations@impact-initiatives.org)

*IMPACT Initiatives is a Swiss-registered non-profit association, governed by its statutes and the Swiss Civil Code. It is politically neutral and non-religious. IMPACT Initiatives is registered with the Commercial Register (CH-660.2.788.024-2). The organization is overseen by a General Assembly consisting of nine members, five of whom are elected as Committee members. For more details, please refer to our [2023 Annual Report](#).*