



CAYMANIANS FIRST CHARITABLE FOUNDATION

DONATION ACCEPTANCE POLICY

TABLE OF CONTENTS

PURPOSE	1
LEGAL AND REGULATORY CONTEXT	2
SCOPE	2
PRINCIPLES FOR ACCEPTING DONATIONS	2
ACCEPTANCE CRITERIA	3
PROHIBITED OR DECLINED DONATIONS	4
CORPORATE AND NON-PROFIT DONATIONS	4
ACKNOWLEDGMENT AND RECEIPT	4
DOCUMENTATION AND RECORDKEEPING	5
REVIEW AND EXCEPTIONS	5
APPROVAL	5

PURPOSE

This policy outlines the principles governing the acceptance of donations by the Caymanians First Charitable Foundation (“the Foundation”), ensuring that all contributions—whether from individuals, corporations, other non-profit organisations, or other sources—are consistent with the Foundation’s charitable mission, legal obligations under Cayman Islands law, and best practices for transparency, accountability, and financial integrity.



LEGAL AND REGULATORY CONTEXT

This policy supports compliance with applicable Cayman Islands legislation and regulatory expectations, including:

- The Non-Profit Organisations Law, 2020 Revision (“NPO Law”), which regulates the solicitation of contributions from the public and requires registration of entities that solicit or receive donations in or from the Cayman Islands.
- Obligations under Cayman Islands anti-money laundering (AML), counter-terrorist financing (CFT), and counter-proliferation financing (CPF) legislative frameworks, including the Proceeds of Crime Act and the Anti-Money Laundering Regulations, to ensure funds received are not connected to criminal conduct and are properly recorded.
- The Foundation’s constitutional objectives and donor commitments requiring that assets and income be applied exclusively for charitable purposes.

SCOPE

This policy applies to all donations received by the Foundation, including:

- Monetary contributions (cash, cheques, electronic transfers);
- Corporate sponsorships and grants;
- Gifts-in-kind (non-cash assets, services, or materials);
- Bequests and planned gifts; and
- Donations from other non-profit or charitable organisations.

It applies equally to gifts from local and international sources.

PRINCIPLES FOR ACCEPTING DONATIONS

4.1 Alignment with Mission

The Foundation will only accept donations that are consistent with its mission, values, and strategic objectives. Any donation that would compromise or conflict with the Foundation’s purpose or governance standards shall be declined.



4.2 Legality and Compliance

All donations must be lawful. The Foundation will not accept funds from sources that:

- are illegal or derived from activities that are illegal under Cayman Islands law or internationally;
- could reasonably be perceived to undermine the integrity or reputation of the Foundation;
- could implicate the Foundation or its directors in criminal, ethical, or reputational risk (e.g., funds linked to money laundering, terrorist financing, or other financial crime).

The Foundation will not accept donations that include conditions or restrictions that conflict with Cayman Islands law, the Foundation's governing documents, or regulatory obligations under the NPO Law.

4.3 Due Diligence

Due diligence will be performed on prospective donors where appropriate, with a risk-based approach that considers:

- the source of funds;
- the donor's reputation and business activities;
- whether the donation could expose the Foundation to AML/CFT/CPF risk.

Enhanced due diligence may be conducted for large or high-risk donations.

4.4 Transparency

The Foundation will maintain accurate records of all donations received, including donor identity (unless genuinely anonymous and lawful), amount, date, and any conditions attached. Records will be maintained in line with Cayman Islands record-keeping requirements and best practices.

ACCEPTANCE CRITERIA

The Foundation will accept donations that meet the following criteria:

1. Consistency with Objectives: The gift advances the Foundation's charitable objectives.
2. Lawful Origin: The gift is lawful and not derived from activities inconsistent with Cayman law.
3. No Unacceptable Conditions: The gift is offered without restrictions that conflict with the Foundation's mission or obligations.
4. Appropriate Documentation: There is sufficient documentation to verify the source, purpose, and use of the funds.
5. Compliance with Reporting Obligations: The donation can be properly recorded for statutory and tax reporting, if required.



PROHIBITED OR DECLINED DONATIONS

The Foundation will decline donations that:

- Are from sources that cannot be adequately identified or verified;
- Are connected, or reasonably suspected to be connected, to illicit activity (including money laundering/funding of terrorism);
- Contain conditions that could require the Foundation to act outside its governing documents or applicable law;
- Could create undue reputational risk.

CORPORATE AND NON-PROFIT DONATIONS

7.1 Corporations

Corporate gifts and sponsorships may be accepted provided they:

- Comply with the general acceptance criteria;
- Do not imply endorsement of a corporate product or service contrary to the Foundation's interests;
- Are properly documented in a written agreement specifying the nature, amount, and use of the donation.

7.2 Donations from Other Non-Profits

Gifts from other non-profit organisations, including grants and collaborative funding arrangements, are acceptable when:

- The other organisation has a legitimate charitable purpose;
- The funds align with the Foundation's objectives and legal responsibilities;
- There is transparency about how funds will be used.

ACKNOWLEDGMENT AND RECEIPT

The Foundation will issue an acknowledgment to each donor that includes:

- Donor name (if not anonymous)
- Donation amount or description of in-kind gift
- Date of receipt
- Statement of the Foundation's charitable status and use of the donation

This documentation assists with donor records and compliance obligations.



DOCUMENTATION AND RECORDKEEPING

All donation documentation will be retained in the Foundation's financial records in accordance with Cayman Islands statutory and regulatory requirements and the Foundation's record retention policies. Particular attention will be paid to:

- Donor identity and source verification (as applicable)
- Donation agreements and conditions
- AML/CFT/CPF screening where relevant

REVIEW AND EXCEPTIONS

The Board of Directors may approve exceptions to this policy where doing so is consistent with the Foundation's mission and legal obligations. Any exceptions must be documented with reasons and approved in writing.

APPROVAL

This policy will be reviewed annually to ensure it remains effective and aligned with the foundation's mission, evolving regulations and governance best practices.