Sawgrass Foundation Gifting Policy

- **Purpose and Scope**

The Sawgrass Foundation (the "Foundation") accepts gifts of securities to support its charitable mission. This policy establishes guidelines for the acceptance, valuation, and disposition of such gifts, ensuring consistency, operational efficiency, and compliance with applicable IRS regulations.

- **Acceptance of Publicly Traded Securities**

- Marketable Securities:
  Readily marketable securities (including those listed on the registered exchanges) are generally accepted upon transfer to the Foundation's designated brokerage account.
- Valuation:
  For gift acknowledgment purposes, securities are recorded at the fair market value, defined as the average of the high and low trading prices on the date the securities are received into the Foundation's brokerage account.
- Liquidation Policy:
  To minimize exposure to market volatility, the Foundation's standard practice is to liquidate all publicly traded securities promptly upon receipt. All securities must be transferred via DTC to the Foundation's brokerage account held with Vigil Wealth Management LLC who will provide Foundation account details (DTC Number and Account Number)

- **Closely Held and Restricted Securities**

Gifts of closely held securities, including equity or debt interests in non-publicly traded entities, will be evaluated on a case-by-case basis and are subject to approval by the Foundation's Board of Directors. In evaluating such gifts, the Foundation will consider:

- Transfer restrictions and marketability;
- Potential holding period and liquidity considerations;
- Any associated liabilities or obligations; and
- A qualified independent appraisal may be required to substantiate the fair market value of the gift for tax reporting purposes.

- **Donor Acknowledgment and IRS Compliance**

The Foundation will provide a written acknowledgment to the donor within 30 days of receipt of the gift. The acknowledgment will include:

- Description of the security;
- Number of shares received; and
- Date of receipt

In accordance with IRS guidelines, the Foundation will not assign or confirm a monetary value for the donated securities.

For non-cash contributions exceeding $5,000, the Foundation will complete and sign IRS Form 8283, as required, upon receipt of the gift. If the Foundation disposes of the donated securities within three years, it will file IRS Form 8282.

- **Costs and Restrictions**

There are no fees associated with the liquidation of securities

The Foundation reserves the right to decline any gift of securities that:

- Is subject to significant restrictions;
- Presents undue administrative burden; and
- Exposes the Foundation to potential liability or reputational risk