



**MONUMENT HILL FOUNDATION
POLICIES**

APPROVED OCTOBER 22, 2025

TABLE OF CONTENTS

<u>ARTICLE</u>	<u>TITLE</u>	<u>PAGE</u>
A.	Board of Directors	
B.	Financial Management	
C.	Granting	
D.	Fundraising and Donor Relations	
E.	Investments	
F.	Conflict of Interest	
G.	Website	
H.	Policy Review and Amendment	
I.	Operation as a Public Charity	
J.	Nondiscrimination & Anti-Harassment	
K.	Record Retention and Destruction Policy	
L.	Whistleblower Protection	
Exhibit I.	Gift Commitment Form	
Exhibit II	Monument Hill Foundation – Reimbursement Request	

MONUMENT HILL FOUNDATION

POLICIES

INTRODUCTION

The Monument Hill Foundation (the “Foundation”) is a nonprofit corporation organized under the laws of the State of Colorado in accordance with Articles of Incorporation filed with the Colorado Secretary of State on July 13, 2004, as amended (the “Articles”). The Bylaws of the Foundation (the “Bylaws”) provide that the sole member of the Foundation is Monument Hill Service Club, d/b/a Monument Hill Kiwanis Club (the “Club”). The provisions of these Policies are subject to the provisions of the Articles and the Bylaws and in the event of inconsistency the provisions of the Articles and the Bylaws will control. The principal offices of the Foundation are located in northern El Paso County in the State of Colorado.

I. ARTICLE A. BOARD OF DIRECTORS

- 1. Meetings.** Regular meetings of the Foundation Board of Directors (the “Board”) will be held in northern El Paso County, Colorado on a quarterly basis during the month following each fiscal quarter. Special meetings may be called by the Executive Director or by at least four (4) directors upon at least two (2) days’ prior written notice. Although not physically present, a director is deemed to be present at a regular or special meeting if the director participates in such meeting using any means of communication by which all directors participating in the meeting may understand and communicate with each other on a contemporaneous basis during the meeting.
- 2. Action Without a Meeting.** Any action that may otherwise be taken at a meeting may be taken without a meeting providing notice is transmitted by the Executive Director or by the Secretary (with the approval of the Executive Director) electronically or otherwise in writing to each Board member and each member by the time stated in the notice electronically or otherwise (i) votes in writing for such action; or (ii) votes in writing against such action, abstains in writing from voting, or fails to respond or vote, or (iii) fails to demand in writing that action not be taken without a meeting. Such notice shall include (i) the action to be taken; (ii) the time by which a Board member must respond; and (iii) that failure to respond by the time stated in the notice will have the same effect as abstaining in writing by the time stated and failing to demand in writing by the time stated in the notice that action not be taken without a meeting. Action will be taken under this section only if, at the end of the time stated in the notice, the affirmative votes in writing for such action received by the Secretary and not subsequently revoked prior to the time specified in the notice equal or exceed the minimum number of votes that would be necessary to take such action at a Board meeting

at which members were present where the action would benefit from a contemporaneous exchange of views. Action without a meeting may, however, be necessary or appropriate from time to time to avoid delays in addressing issues of a time-sensitive nature.

3. **Notices.** When required or permitted by the Articles, Bylaws or these policies, notices must be given in writing and may be given in person, by first class mail addressed to the recipient's street or post office box address shown in the Foundation's current records, or by electronic mail addressed to the recipient's electronic mail address shown in the Foundation's current records. Notices given by first class or electronic mail are effective two (2) days after the date of mailing.
4. **Reporting.** The Executive Director, or his/her designee, shall make an annual report to the Club members to include grant request results; a summary of the corpus' 5-year financial position; and the donor recognition program.

II. Article B. Financial Management

1. **General.** The Treasurer will manage the funds of the Foundation in accordance with the Foundation's By-laws, Policies and Procedures and the direction of the Board. If the Treasurer is also serving as the Bookkeeper, the Executive Director and/or Club Treasurer (having familiarity with and access to the Foundation's Quick Book accounts) will work closely with the Treasurer in carrying out the responsibilities of the functions of treasurer set forth in these policies. The following outlines the procedures to be followed.
2. **Planning and Budgeting.** The Foundation's fiscal year begins July 1 each year and ends June 30th of the following year. The Treasurer will work with the Board and the Bookkeeper to develop a fiscal year budget. This will be done annually and submitted to the Board for approval prior to July 1 each year.
 - a. **Financial Reports.** The Budget will be maintained in Quick Books and used as a guide to Foundation operations throughout the year. Financial performance will be reported to the Board at least quarterly. The Bookkeeper will reconcile the Quick Books with the bank statements monthly and provide a copy of the QB file to the MHKC-Treasurer.

III. ARTICLE C. GRANTING

1. Definitions.

- a. **Annual Call.** A developed effort publicizing the availability of funds to Qualified Community Individuals and Organizations for the upcoming Granting Period.
- b. **Annual Call Date.** The date on which the availability of Foundation discretionary funds is publicly announced.
- c. **Annual Call Cutoff Date.** The last day for receiving grant applications.
- d. **Discretionary Granting Amount.** Total funds provided by the Foundation for distribution as annual discretionary grants as determined by the Board after April 30 of each year for the next Granting Period. The Foundation may not exceed the amount prescribed in the JOA without prior Club approval.
- e. **Designated Beneficiaries.** Organizations that receive grants in amounts designated by the Club.
- f. **Granting Distribution Period.** The granting distribution period is at the discretion of the Granting Committee, in consultation with the MHF Treasurer.
- g. **Qualified Community Organizations.** Local (Tri-Lakes Area, Northern El Paso County, and the greater Colorado Springs Area) organizations including, but not limited to, qualified non-profits, schools, and organizations performing public service to their community in accordance with the Foundation mission statement. Funds distributed to an individual must be made on a true charitable basis in furtherance of the purpose of the Foundation.

(1.) Limitations to granting.

- (a.) Grants will not be made directly to individuals. Accurate accounting for all funds granted is mandatory. Accurate accounting cannot be ensured by distributing grant money to an individual. Grants will be given only to the the school or organization providing the education service for the intended purpose of the grant.
- (b.) Grants will not be given to students who are attending schools outside of the United States of America.

2. Responsibilities.

- a. **Director of Granting.** The Director of Granting will:

- (1.) Recommend individuals for appointment to the Granting Committee.
- (2.) Coordinate and whenever possible chair all meetings of the Granting Committee.
- (3.) Oversee the discretionary granting process from receipt of the Discretionary Granting Amount to fund distribution and verification.
- (1.) Oversee the process of making grants to Designated Beneficiaries.

b. Granting Committee. The Granting Committee will:

- (1.) Establish a Granting Plan and associated timetable for the Granting Period. The Granting Plan will be submitted for approval or modification to the Board.
- (2.) In accordance with the Discretionary Granting Amount and timetable, initiate an Annual Call for all Qualified Community Individuals and Organizations wishing to apply for grants from the Foundation.
- (3.) Review all qualifying requests for eligibility.
- (4.) Based on the Discretionary Granting Amount, identify amounts to be distributed to selected grantees
- (5.) Submit the list of grantees and amounts to be granted to the Board for approval or modification.
- (6.) The Executive Director or Director of Granting will inform the Board of the grants approved and grants not approved.
- (7.) Review any changes to grantees' plans, vote on these changes, and submit any approved changes to the Board.
- (8.) Arrange for distribution of funds.
- (9.) Ensure appropriate publicity of grantees, the Foundation, and the Club.
- (10.) When appropriate and possible, verify proper use of all granted funds.

3. **Procedures:** The Director of Granting and the Granting Committee will comply with the following procedures in performing their functions under these policies:
 - a. **Timetable.** The Director of Granting will develop a detailed timetable for granting events, to include a timeframe for publicity for the Annual Call, a specific Annual Call Date, a specific Annual Call Cutoff Date, and a completion date for Granting Committee evaluation to ensure that the Granting Plan is submitted to the Board in a timely matter.
 - b. **Announcement of Annual Call.** The Director of Granting will use appropriate media (such as local newspapers, flyers, etc.), direct mailings, and informational briefings to publicize the availability of Foundation funds, in accordance with its mission statement, to be granted to Qualified Community Individuals and Organizations, along with the Annual Call Date and the Annual Call Cutoff Date. Ordinarily, all the previous year's recipients will be notified of the upcoming call.
 - c. **Applicant List.** Following the Annual Call Cutoff Date, each Granting Committee Member will receive a complete listing of all applications.

- d. **Determining Applicant Qualification and Allocation.** During a Granting Committee meeting, each member of the Committee will participate in an evaluation of each individual application as to qualification, and the Committee will subsequently assign funding in accordance with the discretionary granting amount, as appropriate
- e. **Conflicts of Interest.** Individual Granting Committee members will not evaluate, rank, allocate funds to, or otherwise vote on applications from individuals or organizations with which they have a “financial interest” within the meaning of the Foundation’s Conflict of Interest policies or with which they have a personal and longstanding (defined as multi-year) relationship with the organization or member of its staff in promoting its mission and objectives that may prevent them from being objective, or could be perceived as such. In such case, the member must recuse himself/herself from acting on that application. At the same time an action concerning such an individual or organization is to be taken, the member having the conflict will be required to leave the meeting room temporarily until that action is disposed of by the remaining members of the committee. Further, this same policy applies to any person not a member of the committee who may be present at a committee meeting as a guest or observer for any reason.
- f. **Scholarship Programs.** The Granting Committee is authorized to consider and rank scholarship programs that further the Foundation’s mission along with applications from individuals and organizations. All approved scholarship programs must be governed by written procedures approved by the Board.
- g. **Adoption of Proposed Granting Plan.** The Granting Committee at a duly called meeting at which a quorum (50% plus one of the members) is present will vote on each grant request to create a final rank ordering and monetary allocation which will be approved by the Committee. The resulting list of recommended and rejected grant requests will be forwarded to the Board for final approval or modification.
- h. **Notification to Applicants.** Upon approval or modification from the Foundation Board, the Director of Granting will notify, in writing, all applicants of the decision.

- i. **Club Management Reserve.** Section 3.04 of the Joint Operating Agreement dated July 1, 2024, describes the Club Management Reserve (CMR). The Club shall receive and process requests that fall outside the annual Granting *application* cycle. Funds approved by the Club shall be dispersed from the CMR kept by the foundation as directed by the Club. *Distribution from* The CMR shall not exceed \$10,000 during the fiscal year of the Foundation, *without MHF Board approval*. Funds distributed from the CMR shall be replenished by the Foundation at the end of the Foundation fiscal year subject to the availability of funds after required Corpus funding and discretionary grants.
- j. **Payment of Grants.** The Director of Granting will give the Treasurer advance notice of check requests to enable the Treasurer to ensure that adequate funds are available. The Director of Granting will arrange to distribute the funds to each grantee. Where possible, this will be done at a Club meeting. The Director of Granting will coordinate with the Club's Director of Public Relations, as appropriate, to publicize these events.
- k. **Acknowledgments.** Grants to organizations require an acknowledgment, on organizational letterhead, of the receipt of funds within ninety days of distribution. Grants to individuals also require an acknowledgement of funds received within ninety days of distribution. The Director of Granting will maintain a record of all grant acknowledgements and ensure follow-up actions for those acknowledgements not received.
- l. **Individual Grants.** The Director of Granting will keep adequate records and case histories that demonstrate that a grant to an individual furthers the Foundation's charitable purposes. Case histories will show names, addresses, purposes of grants, manner of selection, and relationship (if any) to members, officers, trustees or donors to the Foundation or the Club.
- m. **Reporting.** The Director of Granting will report any suspected or verified abuse or misuse of funds by a grantee to the Board. A detailed report of all distributions to grantees will be made available to the Board on a quarterly basis.

4. ARTICLE D. FUNDRAISING AND DONOR RELATIONS.

1. General.

- a. **Mission.** The Foundation will only accept gifts that are consistent with the advancement of its mission.
- b. **Use of Gifts.** Ordinarily, gifts to the Foundation are accepted on an unconditional basis and the use of gifts is designated by the Board. If a donor makes a gift subject to an express written condition that the gift be used for a particular purpose and the condition is accepted by an authorized representative of the Foundation, the gift may only be used for the designated purpose. For purposes of this paragraph, an “authorized representative of the Foundation” will mean the Executive Director or, if the Executive Director is not available at the time the condition is presented, the Director of Donor Relations.
- c. The Monument Hill Foundation, a 501.c.3., usually accepts cash donations from the MHKC and individuals.
 - (1.) Donors wishing to make a donation other than cash should establish their own charitable giving vehicle. Charitable giving vehicles are structures that enable individuals and families to make donations to charities, providing tax benefits and fulfilling philanthropic goals. One example of such a vehicle is a Donor Advised Fund (DAF). A DAF allows for simple and tax-deductible contributions of stocks and bonds to the fund. The fund can then be used to make donations to charities of one’s choosing.
 - (2.) Donations of cars and pickup trucks will be accepted only through the use of a third-party that manages the donations of cars and pickup trucks to non-profits and charities. “Vehicles for Charities” is the recommended company. The point of contact for the donations of cars and pickup trucks to the Foundation will be the Foundation Secretary.
- d. **Ethics.** All giving programs will be conducted in accordance with *the Code of Ethical Principles & Standards* published by the Association of Fundraising Professionals (the “Ethical Code” available at <https://afpglobal.org/ethics/code-ethics>) and all applicable federal and state governmental requirements.
- e. **Authority.** No individual or affiliated or recipient organization will solicit funds in the name of, or on behalf of, the Foundation unless authorized to do so by the Board or its designee.
- f. **Clearance.** The Board or its designee must approve all solicitations in advance.
- g. **Gift Formats.** The Foundation approves acceptance of the following gift formats. (See Gift Formats for details):

- (1.) Cash and securities
- (2.) Wills and Revocable Trusts.
- (3.) Life Insurance; and retirement Plans.
- (4.) Cars and pickup trucks
- (5.) Cryptocurrencies - such as Bitcoin - will not be accepted.

h. Promises to Give. The Board or its designees may solicit promises to give on behalf of the Foundation. All promises to give must be submitted in writing to the Foundation. Promises to give may not exceed five (5) years in duration. All promises to give that have not resulted in payment for three (3) years from the promised payment date will be written off. Without limitation, promises to give may be made in the form of the Gift Commitment Form attached as Exhibit I of these Policies.

2. Donor Relations.

- a. Quid Pro Quo.** It is the policy of the Foundation that all recognition programs are structured so as not to create a “quid pro quo” contribution as defined by the IRS.
- b. Annual Gifts.** The Foundation will conduct an Annual Giving Campaign (AGC). Eligibility for recognition for making donations to the Foundation is extended to corporations, non-profit entities, couples/families, and individuals. All gifts given by a donor during the Foundation’s fiscal year (July 1 – June 30) will be credited toward the donor’s total giving for annual recognition. Recognition will be provided in various forms, commensurate with the level of the cumulative donation made during the year.

- (1.) The first time an individual donor donates a minimum of \$100 cumulative during an AGC, that donor will receive a lapel pin recognizing the donation. For such a donation during a subsequent AGC, the donor will receive a device, called a “rocker”, to be worn attached to the original pin to indicate the number of AGCs during which the donor has made a qualifying donation. In each year that a suitable donation is made, the current rocker will be exchanged for a new one indicating the number of years the award has been received. These pins and rockers will be presented at a meeting of the Club in the month following the end of the quarter in which the qualifying donation was made.

- (2.) In addition to the pins and rockers, donors will also be appropriately recognized at the end of the AGC, depending on the cumulative amount donated during the AGC. The levels of donations and corresponding form of recognition are as follows:
- a. Bronze – At least \$100 – Bronze Certificate
 - b. Silver – At least \$250 – Silver Certificate
 - c. Gold – At least \$500 – Gold Certificate
 - d. Platinum – At least \$1,000 – Platinum Certificate and 3-inch medallion with ribbon and mounting device for desk display

In addition, donors will be recognized in the Annual Report of the Foundation, and as otherwise determined to be appropriate.

- (3.) Except for the presentation of pins on a quarterly basis, all other recognition of giving during the AGC will be conducted by the Foundation on an annual basis. The normal venue for the presentation of awards will be during a regular meeting of the Club in the first month of the new quarter following the end of the Foundation fiscal year.
- (4.) Donations may also be made on a family basis (for example, husband and wife by name, or "the [name] family") and will be recognized on that basis on the certificate.

c. Accumulated Giving. Donors who have reached the accumulated lifetime giving level of at least \$1,000 will be recognized with a 3-inch medallion with ribbon and mounting device for desk display. In addition, the Foundation hereby establishes a recognition society called the "Life Patron Society" to recognize the accumulated lifetime giving of donors who have given at least \$10,000. The members of the Life Patron Society will receive a special plaque that incorporates the 3-inch medallion mentioned above and recognition in the Annual Report of the Foundation, at any recognition event, and as otherwise determined to be appropriate.

- (1.) Donations may also be made on a family basis (for example, husband and wife by name, or "the [name] family") and will be recognized on that basis on the plaque.

- (2.) Unlike recognition for the AGC, appropriate recognition and induction into the Life Patron Society will occur as soon as possible after the receipt and validation of a cumulative gift to the Foundation of \$10,000 or more. The normal venue for presentation of awards will be during a regular meeting of the Club or at other venues as may be deemed suitable.

d. Planned Gifts. The Foundation hereby establishes a recognition society called the “Legacy Society” to recognize individuals, couples, or families who have established planned gifts to the Foundation. Individuals will be given membership in the society by notifying the Foundation in writing that they have made a planned gift with the Foundation as beneficiary. At the time a gift is made, donors must indicate their desire to be anonymous or their willingness to have their name published. Public announcements or other publicity concerning gifts not indicated as anonymous are the prerogative of the Foundation. Such recognition may include mention in the Annual Report, at any recognition event, and as otherwise determined to be appropriate. Donors or members of a deceased donor’s immediate family will be consulted, and their approval will be sought before gifts are made public. Donor(s) will receive a certificate to indicate their membership in the Legacy Society. Induction into the Legacy Society will occur as soon as possible after the receipt of notification during a regularly scheduled Club meeting or at other venues as may be suitable.

e. Campaign Recognition. The Board reserves the right to establish special recognition programs for gifts made as part of a specific campaign. Such recognition programs will be defined in the campaign plan and will be limited to those gifts given specifically to that campaign.

f. Gift Acknowledgment and Recognition.

(1.) The Director of Donor Relations will provide donors and individuals making planned gift commitments with written acknowledgments, including such information as may be appropriate to support tax deductibility.

(2.) In addition, the Director of Donor Relations will provide a list of all those donors who do not wish to remain anonymous to the Foundation Executive Director to be included in the Annual Report of the Foundation.

- g. Annual Report.** The Annual Report of the Foundation will include a report on the Foundation funds, which will include the following:
- (1.) Book value and market value of the funds as of the end of the fiscal year
 - (2.) A report on new gifts to the funds during the past fiscal year, including recognition information.
 - (3.) Changes in the value of the funds due to investment activities for the past fiscal year
 - (4.) Any distributions made during the past fiscal year.

3. Planned Giving.

- a. Purpose of the Program.** The Planned Giving Program offers gift opportunities for donors who want to provide philanthropic support to the Foundation through financial or estate planning. Donor objectives under the Planned Giving Program may include, but are not limited to, the following:
- (1.) Offering donors the opportunity to retain life income from their capital while making commitments to the Foundation.
 - (2.) Enabling donors to make significant gifts during their life that might not have been possible without income retention.
 - (3.) Allowing donors to provide benefits for family and other desired beneficiaries.
 - (4.) Encouraging estate planning and the preparation and maintenance of up-to-date wills.
- b. Conditional Gifts.** Any gift that is conditional or imposes any legal obligation on the Foundation may not be accepted without the approval of the Board. The Board reserves the right to decline any bequest or gift if it is determined that the gift is not in the best interest of the Foundation or the donor.
- c. Legal Counsel and Financial Advisors.** Donors will be advised to seek their own legal counsel and financial advisors in all aspects of a proposed gift. Legal counsel may be used by the Foundation as determined by the Executive Director.
- d. Separate Trustee.** The Foundation will not act as trustee under any gift format.
- e. Ethical Practices.** All individuals authorized to solicit or accept planned gifts for the Foundation will follow the Ethical Code and the practices set forth below:
- (1.) No one acting on behalf of the Foundation will represent themselves as a legal, financial, or tax advisor. In considering any gift proposal, Foundation representatives will advise the donor to have the proposal reviewed by the donor's own financial and legal advisors.

- (2.) The Planned Giving Program is donor oriented. In all matters involving donors or donor prospects, their needs are a primary consideration in that no agreement, charitable trust, or other commitment will be urged upon a donor at the expense of the donor's better interest, even if this results in a smaller gift or no gift to the Foundation.
- (3.) No planned gift will be accepted that has potential negative financial implications for the Foundation.
- (4.) Donor requests for anonymity are always honored unless the Foundation is required by law to provide donor identity to government agencies or third parties.

4. Gift Formats.

- a. **Cash and Securities.** The Executive Director or his/her assignees may solicit gifts of cash and intangible personal property, including stocks and bonds traded on the open market. Donors wishing to make a donation other than cash should establish their own charitable giving vehicle. Charitable giving vehicles are structures that enable individuals and families to make donations to charities, providing tax benefits and fulfilling philanthropic goals. One example of such a vehicle is a Donor Advised Fund (DAF). A DAF allows for simple and tax-deductible contributions of stocks and bonds to the fund. The fund can then be used to make donations to charities of one's choosing.
- b. **Wills and Revocable Trusts.** The Executive Director or his/her assignees may solicit estate gifts through wills or revocable trusts. No member of the Foundation will draft or prepare the will or testamentary letter of a donor. Estate gifts may consist of cash or specific assets such as trusts, securities, or other cash equivalents as well as gifts of personal property or real estate. These gifts can be given as a set amount of money, a percentage of the estate, a remainder of the estate, or a contingency gift.
- c. **Retirement Plans.** The Executive Director or his/her assignees may solicit gifts from retirement plans.

- d. Life Insurance.** The Executive Director or his/her assignees may solicit gifts of life insurance. Donors can make gifts of life insurance by (1) purchasing new policies and naming the Foundation as owner and beneficiary, (2) assigning ownership and beneficiary rights of existing policies to the Foundation, or (3) naming the Foundation only as beneficiary. As owner of any policy, the Foundation will pay any premiums due if the donor makes a gift in like amount to the Foundation. In the event that the donor decides not to make a gift of the premium amount to the Foundation or pay the premiums directly, the Foundation may decide to make such payments or to discontinue payments. Approved types include whole life, universal life by its numerous trade names, and variable life. Ownership by the Foundation of straight term insurance is not approved. However, the donor may designate the Foundation as a beneficiary on term insurance.
- e. Donations of cars and pickup trucks** will be accepted only through the use of a third-party that manages the donations of cars and pickup trucks to non-profits and charities. “Vehicles for Charities” is the recommended company. The point of contact for the donations of cars and pickup trucks to the Foundation will be the Foundation Secretary.

5. ARTICLE E. INVESTMENTS

1. **Scope.** The Foundation hereby adopts this policy to define the investment objectives, constraints, and methods of management of the Foundation’s investments.
2. **Purposes.** This policy is intended to outline a philosophy and attitude that will guide the management of the Foundation’s invested assets toward the desired results. The Foundation intends this policy to be sufficiently specific to be meaningful, yet flexible enough to be practical. More particularly, this policy has the following purposes:
 - a. To define and assign the responsibilities of all involved parties.
 - b. To establish a clear understanding for all involved parties of the Foundation’s investment goals and objectives.
 - c. To offer guidance and limitation to engaged professional experts, if any, regarding the investment of the Foundation’s assets.
 - d. To establish a basis for evaluating investment results.
 - e. To provide a basis for managing the Foundation’s invested assets according to prudent standards as established in common trust law.

3. **Investment Committee.** The Investment Committee may act either by physical meeting or shared communications (email, telephone, ZOOM, etc.). Any action to be taken regarding the Investment Portfolio will be concurred in and agreed to by a majority of the Committee. The Chair or Vice Chair will assign responsibility for carrying out the actions of the Investment Committee, including, without limitation, the execution of investment transactions approved by the Committee.

4. **Investment Principles.**

a. **Interest of Beneficiaries.** Investments will be made solely in the interest of the beneficiaries of the Foundation.

b. **Standards.** The Foundation's assets will be invested with the care, skill, prudence, and diligence under the circumstances then prevailing that a prudent person acting in like capacity and familiar with such matters would use in the investment of assets of like character and with like aims.

c. **Diversification.** Investment of the Foundation's assets will be so diversified as to minimize the risk of large losses, unless under the circumstances it is clearly prudent not to do so.

d. **Professional Experts.** Professional experts that may be engaged to help manage the Foundation's investments may be of varying styles and philosophies to attain the Foundation's objectives.

e. **Employment of Cash.** Cash is to be productively employed at all times by investments in short term cash equivalents to provide safety, liquidity and return.

6. **Investment Management Principles.**

a. **Preservation of Capital.** Consistent with particular investment styles and philosophies, reasonable efforts should be made to preserve capital, understanding that losses may occur in individual investments.

b. **Risk Aversion.** It is understood that risk is present in all types of investments and investment styles and that some risk is necessary to produce long-term investment results that are sufficient to meet the Foundation's objectives. However, reasonable efforts should be made to control risk, and risk assumed should be commensurate with the Foundation's objectives.

c. **Adherence to Investment Discipline.** Professional experts, if any, must adhere to the investment management styles described in the applicable terms of engagement on a consistent basis.

- 7. General Goal.** It is the general goal of the Foundation to provide for grant making in perpetuity. Withdrawals from the investments will be in accordance with the Joint Operating Agreement (JOA) (dated July 1, 2024) guidelines.
- 8. Primary Investment Goal.** The primary objective in the management of the investment of the Foundation's assets is to achieve long-term growth of principal while avoiding excessive risk. An overall level of risk that is reasonably consistent with the underlying indices for the investment or Foundation will be pursued. Short-term volatility will be tolerated to the extent it is consistent with the underlying index upon which the specific fund or investment would normally be measured.

8. Specific Investment Goals. The specific performance investment goals of the Foundation, over an investment horizon of five (5) years, are to perform no less a comparison index of 65% S&P 500 and 35% Barclay's US Aggregate Bond Index.

The total fund performance/return will be compared to the following ratio of indices even though the portfolio may include international as well REIT investments:

- a. **65%** for Equity Investments (foreign and domestic)- The Standard & Poor's 500 Index
- b. **35%** for Bond Investments (including REIT funds) - Barclay's US Aggregate Bond Index

9. Investment Guidelines.

a. Marketability of Assets. All the invested assets of the Foundation will be invested in securities that can be transacted quickly and efficiently with minimal impact on market price.

b. Allowable Assets.

(1.) Cash Equivalents

- Cash equivalents (treasury bills, money market funds rated investment grade or better,
- Commercial paper rated A1 or better, certificates of deposit, and custodial accounts)
- US. Government and Agency securities
- Corporate notes and bonds (rated BBB or better)
- Mortgage-backed bonds (rated BBB or better)
- Preferred stock
- Foreign government fixed income securities.

(2.) Equity Securities

- Common stocks (although no more than 4% of the total of the

Foundation assets can be invested in one company's stock.)

- Convertible notes and bonds
- Convertible preferred stocks
- American depository receipts of non-US corporations
- Stocks of non-US corporations traded on the New York Stock Exchange as American Depository Receipts.

c. Prohibited Assets,

- (1.) Derivative securities
- (2.) Commodities and futures contracts
- (3.) Private placements
- (4.) Limited partnerships not traded on the New York Stock Exchange
- (5.) Venture capital investments
- (6.) Real estate, excluding real estate investment trusts
- (7.) Collateralized mortgage obligations other than GNMA obligations
- (8.) Loaded mutual funds.

d. Prohibited Transactions.

- (1.) Short selling
- (2.) Margin transactions

e. Asset Allocation. The committee will operate within the following allocation guidelines:

- (1.) Stock and Stock Funds shall comprise approximately 65% (plus or minus 10%) of the value of the fund
- (2.) Bonds, Bond Funds, Real Estate Investment Trusts and Cash shall comprise approximately 35% (plus or minus 10%) of the value of the fund
- (3.) No single investment entity should exceed 10% of the total value of the portfolio.

(4.) A value outside these limits at any time will be cause for rebalancing within 90 days, or for the Committee to make a recommendation to the Board for a change in the allocation guidelines.

f. Performance Reporting. Investment performance will be reported to the Board quarterly along with an annual review after each fiscal year.

9. No Conflict of Interest. No member of the Committee, officer or director of the Foundation, or any spouse, child, parent, brother or sister of such Committee member, officer or director, will have any substantial interest in or have any personal contract or arrangement with any consultant, manager, custodian, broker, or co-trustee doing business with the Foundation, nor will any such person, directly or indirectly, receive any personal financial benefit whatsoever arising out of the investment of the Foundation's assets. Proposed members of the Committee will be required to sign a statement to this effect prior to assuming duties on the Committee.

10. Policy Review. To assure the continued relevance and appropriateness of this Investment Policy, the Investment Committee shall review its terms at least annually (in conjunction with the annual Foundation Policies review) and recommend any changes to the Board.

11. ARTICLE F. CONFLICT OF INTEREST.

1. Purpose. The purpose of the conflict-of-interest policy is to protect this tax-exempt Organization's (the "Organization") interest when it is contemplating entering into a transaction or arrangement that might benefit the private interest of an officer or director of the Organization or might result in a possible excess benefit transaction. This policy is intended to supplement but not replace any applicable state and federal laws governing conflict of interest applicable to nonprofit and charitable organizations.

2. Definitions.

a. Interested Person. An interested person is any director, principal officer, or member of a committee with Board delegated powers, who has a direct or indirect financial interest.

b. Financial Interest. A person has a financial interest if the person has, directly or indirectly, through business, investment, or family:

- (1.) An ownership or investment interest in any entity with which the Organization has a transaction or arrangement,
- (2.) A compensation arrangement with the Organization or with any entity or individual with which the Organization has a transaction or arrangement, or
- (3.) A potential ownership or investment interest in, or compensation arrangement with, any entity or individual with which the Organization is negotiating a transaction or arrangement. Compensation includes direct and indirect remuneration as well as gifts or favors that are not insubstantial. A financial interest is not necessarily a conflict of interest. Under Article F.3. c. (below) a person who has a financial interest may have a conflict of interest only if the Board or appropriate committee decides that a conflict of interest exists.

3. Procedures.

a. Duty to Disclose. In connection with any actual or possible conflict of interest, an interested person must disclose the existence of the financial interest and be given the opportunity to disclose all material facts to the Board and members of appropriate committees with Board delegated powers considering the proposed transaction or arrangement.

b. Determining Whether a Conflict of Interest Exists. After disclosure of the financial interest and all material facts, and after any discussion with the interested person, he/she shall leave the Board or appropriate committee meeting while the determination of a conflict of interest is discussed and voted upon. The remaining Board members or appropriate committee shall decide if a conflict exists.

c. Procedures for Addressing the Conflict of Interest.

- (1.) An interested person may make a presentation at the Board or appropriate committee meeting, but after the presentation, he/she shall leave the meeting during the discussion of, and the vote on, the transaction or arrangement involving the possible conflict of interest.
- (2.) The chairperson of the Board or appropriate committee shall, if appropriate, appoint a disinterested person or committee to investigate alternatives to the proposed transaction or arrangement.

- (3.) After exercising due diligence, the Board or appropriate committee shall determine whether the Organization can obtain with reasonable efforts a more advantageous transaction or arrangement from a person or entity that would not give rise to a conflict of interest.
- (4.) If a more advantageous transaction or arrangement is not reasonably possible under circumstances not producing a conflict of interest, the Board or appropriate committee shall determine by a majority vote of the disinterested Board members whether the transaction or arrangement is in the Organization's best interest, for its own benefit, and whether it is fair and reasonable. In conformity with the above determination, it shall make its decision as to whether to enter into the transaction or arrangement.

d. Violations of the Conflicts of Interest Policy.

- (1.) If the Board or appropriate committee has reasonable cause to believe a member has failed to disclose actual or possible conflicts of interest, it shall inform the member of the basis for such belief and afford the member an opportunity to explain the alleged failure to disclose.
- (2.) If, after hearing the member's response and after making further investigation as warranted by the circumstances, the Board or appropriate committee determines the member has failed to disclose an actual or possible conflict of interest, it shall take appropriate disciplinary and corrective action.

4. Records of Proceedings. The minutes of the Board and all appropriate committees with Board delegated powers shall contain:

- a. The names of the persons who disclosed or otherwise were found to have a financial interest in connection with an actual or possible conflict of interest, the nature of the financial interest, any action taken to determine whether a conflict of interest was present, and the Board's or appropriate committee's decision as to whether a conflict of interest in fact existed.
- b. The names of the persons who were present for discussions and votes relating to the transaction or arrangement, the content of the discussion, including any alternatives to the proposed transaction or arrangement, and a record of any votes taken regarding the proceedings.

12. ARTICLE G. WEBSITE.

The Foundation website shall be established and maintained by the Secretary at <http://www.monumenthillfoundation.org/>. Board officers are responsible for assuring that website pages within their area of responsibility are consistent with the needs of the Foundation and kept up to date. The Foundation may engage a contractor to make necessary changes to the website, only if absolutely necessary.

13. ARTICLE H. POLICY REVIEW AND AMENDMENT.

- 1. Policy Review.** During the last fiscal quarter of each year, the Executive Director and Secretary will initiate the Board's review of these Policies, and the Executive Director or Secretary will communicate the results of such review to the Board.
- 2. Policy Amendment.** These Policies may be amended or restated by the Board at any time.

14. ARTICLE I. OPERATION AS A PUBLIC CHARITY.

- 1. Organization.** The Foundation is organized exclusively for charitable, religious, educational, or scientific purposes, including, for such purposes, the making of distributions to organizations that qualify as exempt organizations under section 501 (c) (3) of the Internal Revenue Code, or corresponding section of any future federal tax code.
- 2. Operations.** No part of the net earnings of the Foundation shall inure to the benefit of, or be distributable to its members, trustees, officers, or other private persons, except that the Foundation shall be authorized and empowered to pay reasonable compensation for services rendered and to make payments and distributions in furtherance of the purposes set forth above. No substantial part of the activities of the Foundation shall be the carrying on of propaganda, or otherwise attempting to influence legislation, and the Foundation shall not participate in, or intervene in (including the publishing or distribution of statements) any political campaign on behalf of any candidate for public office. Notwithstanding any other provision of this document, the Foundation shall not carry on any other activities not permitted to be carried on (a) by an organization exempt from federal income tax under section 501 (c) (3) of the Internal Revenue Code, or corresponding section of any future federal tax code, or (b) by an organization, contributions to which are deductible under section 170 (c) (2) of the Internal Revenue Code, or corresponding section of any future tax code.

3. **Dissolution.** Upon the dissolution of the Foundation, assets shall be distributed for one or more exempt purposes within the meaning of section 501 (c) (3) of the Internal Revenue Code, or corresponding section of any future federal tax code, or shall be distributed to the federal government, or to a state or local government, for a public purpose. Any such assets not disposed of shall be disposed of pursuant to the laws of the state in which the principal office of the organization resided for such charitable purposes as they were organized and operated.
4. **Sales Use Tax Exemption.** The Foundation is exempt from application of the Colorado Sales Use Tax laws.

15. Article J. Nondiscrimination & Anti-Harassment.

1. The Monument Hill Foundation (Foundation) is committed to an environment in which all individuals are treated with respect and dignity. Each individual has the right to participate in an atmosphere that prohibits unlawful discriminatory practices, including harassment. Therefore, the Foundation expects all relationships among Foundation volunteers to be free from explicit bias, prejudice and harassment.
2. The Foundation will make every reasonable effort to ensure that all concerned are familiar with these policies and are aware that any complaint in violation of such policies will be investigated and resolved appropriately. These policies should not, and may not, be used as a basis for excluding or separating individuals of any protected characteristic, from participating in Foundation business or member social activities or discussions.
3. These policies apply to all members of the Monument Hill Foundation. Any volunteer who has questions or concerns about these policies should talk with the Foundation Executive Director.
 - a. **Equal Employment Opportunity (EEO).** The Foundation has no paid employees, so EEO policies are not applicable.

- b. **Retaliation.** The Foundation prohibits retaliation against any individual who reports discrimination or harassment or participates in an investigation of such reports. Acts of retaliation should be reported immediately to the Executive Director and will be promptly investigated and addressed. Verified acts of retaliation will be subject to disciplinary action. Such action may include, warning, reprimand, or termination, as the Foundation believes appropriate under the circumstances.
- c. **Harassment.** Harassment on the basis of any protected characteristic is strictly prohibited. Specifically, sexual harassment constitutes discrimination and is illegal under federal, state and local laws. For the purposes of this policy, “sexual harassment” is as defined in the Equal Employment Opportunity Commission Guidelines and Title VII of the Civil Rights Act of 1964.
- d. **Reporting.** The Foundation encourages prompt reporting of all perceived incidents of discrimination, harassment or retaliation, regardless of the offender’s identity or position, so that rapid and constructive action can be taken before relationships become irreparably strained. In addition, the Foundation encourages individuals who believe they are being subjected to such conduct to promptly advise the offender that his or her behavior is unwelcome and to request that it be discontinued.
- e. **Complaint Procedure.** While no fixed reporting period has been established, early reporting and intervention have proven to be the most effective method of resolving actual or perceived incidents of harassment. Reported allegations of harassment, discrimination or retaliation will be investigated promptly. The Foundation will maintain confidentiality throughout the investigatory process, consistent with adequate investigation and appropriate corrective action. If a party to a complaint does not agree with its resolution, that party may appeal to the Foundation Executive Director. False and malicious complaints of harassment, discrimination or retaliation (as opposed to complaints that, even if erroneous, are made in good faith) may be the subject of appropriate disciplinary action.

16. ARTICLE K. RECORD RETENTION AND DESTRUCTION.

The records of The Monument Hill Foundation are important assets and include essentially all records produced in the conduct of its business, whether paper or electronic. Different types of records require retention for specified periods of time. Failure to retain those records for these minimum periods could subject the MHF to penalties, fines, or other adverse legal action.

The MHF expects all Directors and members to fully comply with the general records retention schedules noted below. However, if you believe, or if the MHF informs you that the Foundation records are relevant to litigation, or potential litigation (i.e. a dispute that could result in litigation), then those records must be preserved until legal authority determines they are no longer needed.

Retention schedules for general categories of documents:

- a. **Corporate Records** – Corporate documents, including charters and by-laws; policy and procedure manuals; Board agenda packets and minutes of the Board and Board Committees; D&O insurance information, reports to the Monument Hill Kiwanis Club should be retained permanently. Responsibility: Foundation Secretary.
- b. **Financial Records.** Tax records, including bank statements and documents concerning revenues and expenses should be retained for seven years from the date of filing of the applicable return. Annual budgets; bank authorizations; and accounting policies and procedures should be retained for at least three years from the date of the last revision. Responsibility: Foundation Treasurer.
- c. **Investment Records.** The Investment Committee Charter should be retained for 3 years beyond the date of the latest revision. Investment Committee minutes; authorization documentation; transaction records; and annual reports from the investment custodian should be retained for at least seven years. Responsibility: Director, Investments
- d. **Granting Records.** The operating procedures for the grant review committee should be retained for 3 years beyond the date of the last revision. Grant requests and proposals, and funded grants should be retained for seven years. Responsibility: Director, Granting & External Relations
- e. **Donor Lists.** Lists of donors, restricted grants and supporting documentation should be retained permanently. Responsibility: Director, Donor Relations

- f. **Archival Records.** In support of its mission, the Foundation routinely develops a variety of records that are archival in nature. These should be retained permanently. Responsibility: Foundation Secretary
- g. **Contracts.** Final copies of all contracts or agreements entered into by the MHF should be retained for at least three years beyond the life of the agreement. Responsibility: Foundation Secretary

17. ARTICLE L. WHISTLEBLOWER PROTECTION.

The Monument Hill Foundation requires directors, officers, and members to observe the highest standards of business and personal ethics in the conduct of their duties and responsibilities.

Members and representatives of the Monument Hill Foundation (MHF) are expected to practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations.

a. Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable members and others to raise serious concerns internally so that the MHF can address and correct suspected unethical or inappropriate conduct and actions. It is the responsibility of all board members, officers, members and volunteers to report concerns about violations of MHF policies or suspected violations of law or regulations that govern the MHF's operations.

b. No Retaliation

It is contrary to the values of MHF for anyone to retaliate against any board member, officer, member or volunteer who in good faith reports an ethics violation; a suspected violation of law, such as a complaint of discrimination; suspected fraud; or suspected violation of any regulation governing the operations of MHF. A member who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of membership.

c. Reporting Procedure

MHF has an open-door policy and recommends that members share their questions, concerns, suggestions or complaints with the MHF Secretary. If the member is not comfortable speaking with the MHF Secretary, they are encouraged to speak with the MHF Executive Director. If involving the Secretary or Executive Director is inappropriate, or their response is not adequate, the person is required to report issues of concern in writing to the President of the Monument Hill Kiwanis Club, who has the responsibility to ensure that all reported complaints are fully investigated, and reported to the MHF Board of Directors.

d. MHF Secretary

The MHF's Secretary is responsible for ensuring that all complaints about unethical or illegal conduct are investigated and resolved. The Secretary will advise the Executive Director and/or the Board of Directors of all complaints and their resolution and will report at least annually to the MHF Board on compliance activity relating to accounting or alleged financial improprieties.

e. Accounting and Auditing Matters

The MHF's Secretary shall immediately notify the MHF Executive Director or alternatively the President of the Monument Hill Kiwanis Club, of any concerns or complaints regarding accounting practices, internal controls or auditing and work with them until the matter is resolved.

f. Acting in Good Faith

Anyone filing a written complaint concerning a violation or suspected violation must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be handled as a serious matter subject to discipline up to and including termination of membership.

g. Confidentiality

Violations or suspected violations may be submitted on a confidential basis by the complainant. Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

h. Handling of Reported Violations

The MHF's Secretary will notify the person who submitted the complaint and acknowledge receipt of the reported violation or suspected violation within five business days. All reports will be promptly investigated, and appropriate corrective action will be taken if warranted by the investigation.

Exhibits

Exhibit 1. Gift Commitment Form (Article D.1.g.

Exhibit 2. Monument Hill Foundation – Reimbursement Request



GIFT COMMITMENT FORM

The Monument Hill Foundation, a financial resource for the Monument Hill Kiwanis Club, has a mission of supporting youth and community in the long term, with a particular focus on programs that benefit the Tri-Lakes area of northern El Paso County, Colorado. Please consider giving generously as part of our Annual Gift Campaign*.

I would like to contribute to the Foundation's Annual Gift Campaign by making a gift in the following amount: \$100-Bronze \$250-Silver \$500-Gold

\$1000-Platinum Other Amount _____

(Please make your check payable to the Monument Hill Foundation.)

Planning on a future gift to the Foundation? (Please check the applicable box.)

- Please contact me about the Foundation's planned gift program.
- I have included the Foundation in my estate plan.

(If you prefer, email the Director, Fundraising and Donor relations through the Foundation web site at: www.monumenthillfoundation.org.)

Name: _____

Address: _____

Telephone: _____

E-Mail: _____

*The Annual Gift Campaign covers gifts received during the Foundation's fiscal year ending June 30. Gifts to the Foundation are deductible as charitable contributions from federal taxable income within the limits of the Internal Revenue Code.



Monument Hill Foundation

PO Box 102 Monument, CO 80132



Reimbursement Request

PAY TO:

ADDRESS:

CITY, STATE, ZIP:

PHONE:

EMAIL:

CHECK OR CREDIT?

PLEASE ATTACH ALL RECEIPTS

- Project Managers must approve all expenses.
- Payments will be issued through our Bill Pay system.
- Payments generally received within 7-10 business days.

PURPOSE OF PURCHASE/COMMENTS:

TOTAL AMOUNT DUE: \$

ORIGINAL INVOICE DATE:

DATE PAID TO VENDOR:

AUTHORITY:

PROJECT MANAGER APPROVAL:

FUND AND EXPENSE ACCOUNT #:

BOOKKEEPER INTERNAL CONTROL SECTION

DATE BOOKKEEPER RECEIVED:

DATE ENTERED IN BOOKS:

MANAGER NOTIFICATION DATE: