

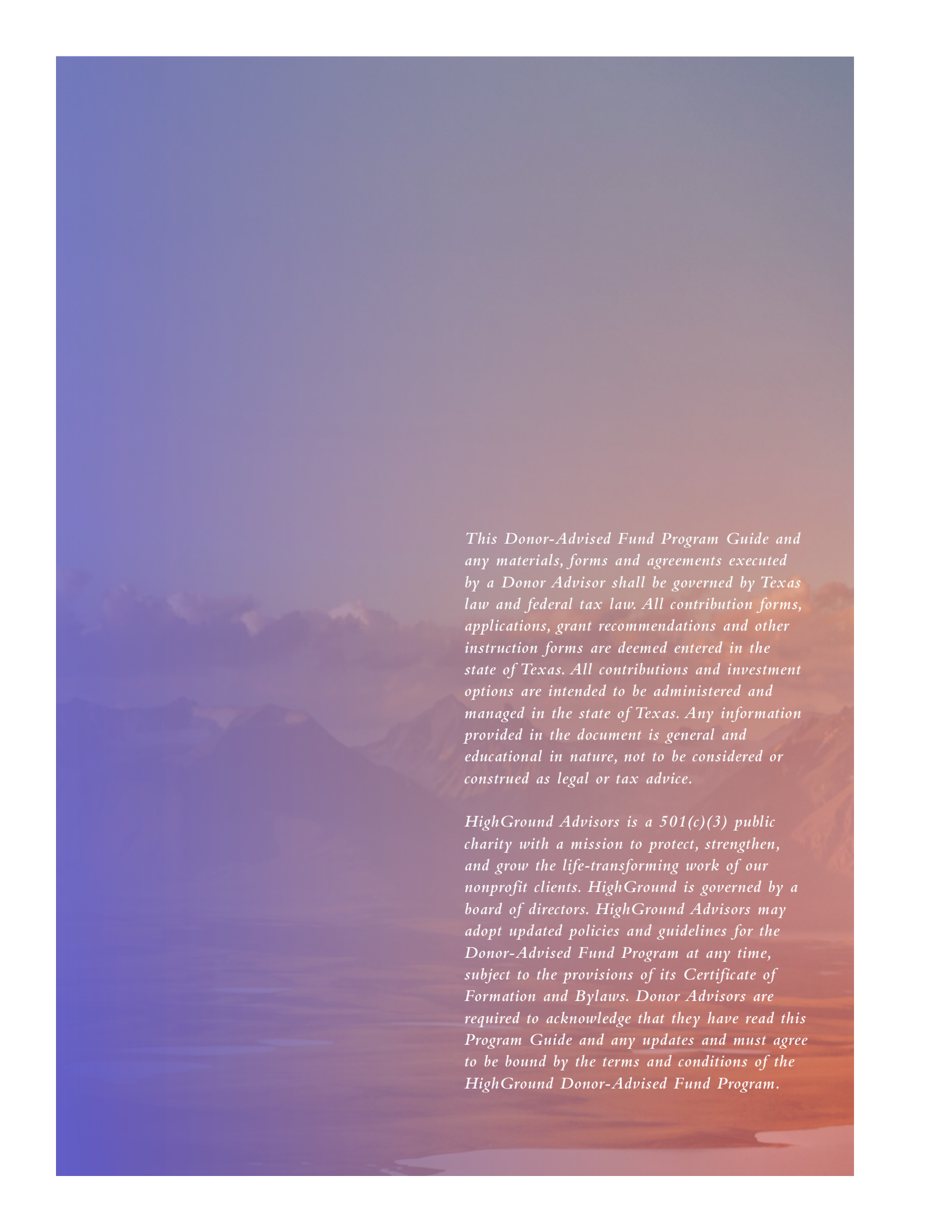
MAY 2026

# DONOR-ADVISED FUND PROGRAM GUIDE

MAXIMIZING CHARITABLE IMPACT AS A  
TRUSTED GIVING PARTNER SINCE 1930.

HIGHGROUND<sup>®</sup>  
ADVISORS

Protect. Strengthen. Grow.<sup>®</sup>



*This Donor-Advised Fund Program Guide and any materials, forms and agreements executed by a Donor Advisor shall be governed by Texas law and federal tax law. All contribution forms, applications, grant recommendations and other instruction forms are deemed entered in the state of Texas. All contributions and investment options are intended to be administered and managed in the state of Texas. Any information provided in the document is general and educational in nature, not to be considered or construed as legal or tax advice.*

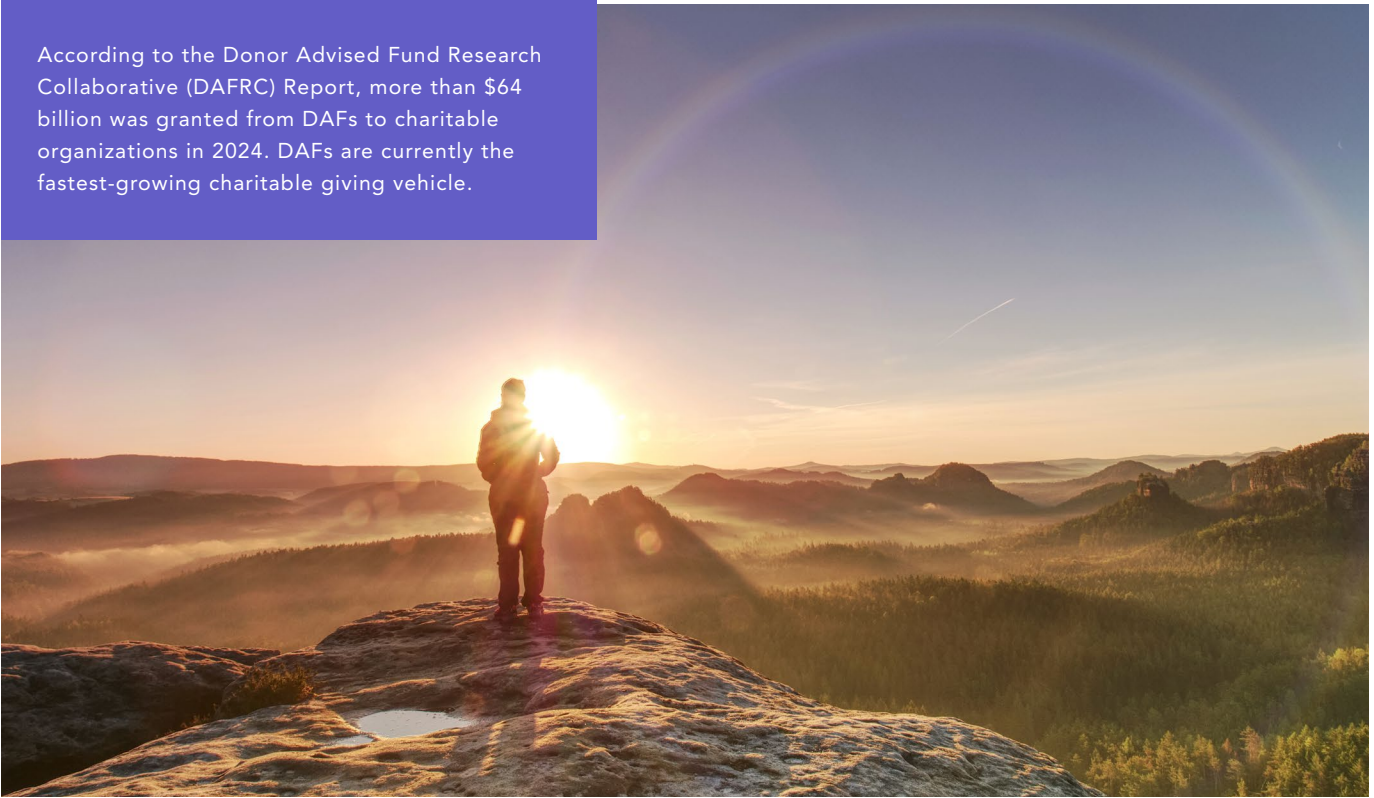
*HighGround Advisors is a 501(c)(3) public charity with a mission to protect, strengthen, and grow the life-transforming work of our nonprofit clients. HighGround is governed by a board of directors. HighGround Advisors may adopt updated policies and guidelines for the Donor-Advised Fund Program at any time, subject to the provisions of its Certificate of Formation and Bylaws. Donor Advisors are required to acknowledge that they have read this Program Guide and any updates and must agree to be bound by the terms and conditions of the HighGround Donor-Advised Fund Program.*

# CONTENTS

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WELCOME	04
ABOUT HIGHGROUND	05
ABOUT DONOR-ADVISED FUNDS	06
ESTABLISH YOUR DONOR-ADVISED FUND	08
Fund Name & Roles	09
Investment Fund Options	10
Fees & Expenses	11
Succession Plan	12
Acknowledgment & Submission	13
CONTRIBUTIONS	14
GRANT RECOMMENDATIONS	18
ADDITIONAL TERMS & GUIDANCE	20

According to the Donor Advised Fund Research Collaborative (DAFRC) Report, more than \$64 billion was granted from DAFs to charitable organizations in 2024. DAFs are currently the fastest-growing charitable giving vehicle.



## *Welcome!*

Nonprofit organizations could not advance their important missions without the generous support of donors like you.

HighGround Advisors' Donor-Advised Fund Program is one way we can help you maximize your charitable impact. One of the fastest-growing and most flexible giving tools, a DAF is an excellent vehicle for donors who wish to give in a tax-advantaged way and streamline the giving process.

This guide is our resource to you. In it, you will learn more about DAFs and their benefits. You'll also learn about HighGround's DAF Program, from investment offerings to succession strategies, and how to establish and manage your HighGround DAF.

To connect with us, call 1.800.747.5564 or email [dafs@highgroundadvisors.org](mailto:dafs@highgroundadvisors.org). Additional information may be found on our website at [highgroundadvisors.org](https://highgroundadvisors.org).

Thank you for making HighGround Advisors your giving partner.

## ABOUT HIGHGROUND ADVISORS

Founded in 1930, HighGround Advisors is a 501(c)(3) nonprofit investment management and charitable gift planning firm with \$3.6 billion in assets. We are committed to advancing the missions of nonprofit organizations by carefully stewarding the assets entrusted to us. Additionally, we help generous individuals give in strategic and tax-efficient ways.

Our expert legal team is equipped to structure and implement a wide range of giving tools, from charitable trusts and gift annuities to endowments and donor-advised funds, as well as facilitate the giving of a variety of assets, from cash and securities to real property and closely-held business interests.

We are committed to financial accountability, transparency and high ethical standards. For this reason, HighGround is Evangelical Council for Financial Accountability (ECFA) accredited, which is based on ethical standards of responsible stewardship, including accountability and sound board governance. The following information about our organization is available on our website or upon request:

- [Audited Financials](#)
- [Website Terms & Conditions Policy](#)
- [Privacy Policy](#)
- [Leadership Team](#)
- Quarterly Investment Review *(upon request)*
- Fund Disclosure Document *(upon request)*
- Code of Ethics *(upon request)*

*Our core values are the heart of HighGround. These values honor heritage and guide us as we work with those who are transforming lives.*

**WE SERVE.**

We lead with a servant heart, rooted in faith. We step in where there is a need, stay present and lead authentically.

**WE STEWARD.**

We act with integrity and professional excellence, faithfully managing all that is entrusted to us.

**WE SHAPE.**

We look ahead with vision and pursue growth and transformation with purpose and passion.

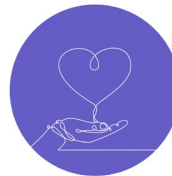
## 10 reasons to establish your donor-advised fund with HighGround and simplify your philanthropic giving:

- 1. ZERO ADMIN FEES**  
To maximize the impact of your charitable giving, HighGround does not charge administrative fees on our donor-advised funds.
- 2. GIVE ANYTIME, ANYWHERE**  
With HighGround's online DAF portal, you can recommend grants to qualified 501(c)(3) charities at any time and from anywhere.
- 3. GROW YOUR GIVING**  
Grow your DAF contributions, tax-free, by choosing from among HighGround's proprietary multi-asset class investment options as well as single-asset class funds to create a customized investment strategy.
- 4. SIMPLIFY TAX SEASON**  
When your charitable giving is streamlined through your DAF, you only have one tax receipt at the end of the year.
- 5. DEDICATED SUPPORT**  
With our Senior Vice President and Chief Strategy Officer ready to assist you in setting up your DAF and a personal account manager assigned to you for all your ongoing DAF needs, the giving process has never been easier.
- 6. ALIGNED VALUES**  
HighGround's values are founded in faith and reflect our call to service for God's glory. We champion the work of nonprofits, churches and ministries, and when you make us your charitable giving partner, you align yourself with an organization that shares your mission.
- 7. NONPROFIT EXPERTISE**  
As a nonprofit ourselves, we know firsthand the unique challenges nonprofits face. HighGround also has well-established relationships with over 580 qualified charities and may already be the trusted investment advisor of the charity you wish to benefit.
- 8. SOCIALLY SCREENED FUNDS\***  
HighGround investment funds are screened to restrict companies whose business activities are inconsistent with Christian faith and values.
- 9. ANYONE CAN CONTRIBUTE**  
Anyone can make a tax-deductible contribution to your donor-advised fund, making it the perfect vehicle for receiving birthday, anniversary or memorial gifts.
- 10. INVESTMENT & LEGAL EXPERTISE**  
HighGround's in-house investment team has over 150 years of combined nonprofit investment experience. For 96 years, our team of expert lawyers has provided legal guidance to nonprofits and their donors in order to help maximize the impact of philanthropic giving.

## ABOUT DONOR-ADVISED FUNDS

A donor-advised fund (DAF) is a charitable giving account that is sponsored by a public charity, like HighGround Advisors, and funded by a donor's tax-deductible contributions of cash, stock, mutual funds or other assets. Contributions to a DAF are invested and have the potential to grow, tax-free, over time. Donors retain the right to recommend grants from their DAFs to eligible charities of their choice. For these reasons, a DAF is an excellent vehicle for donors who wish to maximize their charitable impact, give in a tax-advantageous way, and streamline the administration of their donations.

At HighGround, we like to say that a donor-advised fund allows donors to Give, Grow, & Grant:



### 1. GIVE

Donors make tax-deductible contributions to their donor-advised funds.



### 2. GROW

Contributions are invested and have the potential to grow, tax-free.



### 3. GRANT

At any time, donors recommend grants from their donor-advised funds to the qualified, U.S. charities of their choice.

\*Although the majority of assets are covered by this policy, investments in third-party commingled funds, mutual funds or private investment funds may be permitted, in which case investments are governed by the third-party fund's investment guidelines. Such third-party guidelines may or may not be consistent with HighGround Advisors' social policy or other investment policies and guidelines for the Fund.

**DONOR-ADVISED FUND BENEFIT SUMMARY**

TAX-EFFECTIVE	FLEXIBLE	EASY
Invest your tax-deductible DAF contribution to grow, tax-free	Select investment options that align with your risk tolerance & expected giving time horizon	Monitor your fund balance, contributions and grant history through the online DAF portal
Contribute appreciated assets, such as securities, mutual funds or real estate, and avoid capital gains tax exposure	Recommend grants to one or many charities, in the short term or long term	Ease the administrative burden of your giving, as HighGround performs due diligence, processes grants and provides tax receipts
Reduce the income tax burden of a financial windfall by contributing the extra income to your DAF, prefunding years of charitable giving	Choose to receive recognition or to remain anonymous with each grant	Funnel all your charitable giving through your DAF and receive one tax receipt at year-end
Reduce estate taxes and the inheritance tax burden on loved ones by bequeathing estate assets to your DAF	Involve the family and create a legacy of giving with a DAF succession plan	Recommend grants to qualified 501(c)(3) charities at any time and from anywhere through the online DAF portal



## HERE'S WHAT YOU NEED:

Before starting your donor-advised fund application, you'll want to have the following information available:

- A name for the donor-advised fund
- Legal name, date of birth, mailing address and contact information for each named Donor Advisor, Additional User and Successor Advisor
- A succession plan for your donor-advised fund
- A minimum, irrevocable contribution of \$1,000 upon application approval
- A signature from each Donor Advisor upon application approval

## WE'RE HERE TO HELP:

Should you desire assistance during the application process, our Senior Vice President and Chief Strategy Officer is ready to serve you:

- David Slover  
214.978.3311  
[david.slover@highgroundadvisors.org](mailto:david.slover@highgroundadvisors.org) or  
[dafs@highgroundadvisors.org](mailto:dafs@highgroundadvisors.org)
- HighGround Advisors  
1717 Main Street, Suite 1400  
Dallas, Texas 75201-4622  
214.978.3300 | 800.747.5564

Once your application is approved, you will be assigned a dedicated account manager to handle any request regarding your donor-advised fund.

## ESTABLISHING YOUR DONOR-ADVISED FUND

To establish your donor-advised fund (DAF), please visit [highgroundadvisors.my.site.com/dafs/s/application](https://highgroundadvisors.my.site.com/dafs/s/application) and complete the online application. The application includes three easy steps and, generally, takes about ten minutes to complete:

- Name the fund and any users
- Make investment selections
- Create a succession plan

*Note: To complete your application, you must read and acknowledge that you understand this Donor-Advised Fund Program Guide and read our website's [Terms & Conditions Policy](#), which governs your access and use of the donor-advised fund client portal.*

Once your DAF application is approved and your fund established, you will gain access to your online DAF portal, through which you can:

- Make contributions
- Make grant recommendations
- View statements and history

## FUND NAME & ROLES

### — NAMING THE FUND

The fund name will appear on all correspondence, including the letters sent to the charities receiving grants issued from the fund. Of course, we will always honor your request if you decide to anonymously make grants. When naming your fund, please remain within the follow parameters:

- The name must end with "Fund." If you do not include "Fund" in the name, it will be automatically added upon approval of the application.
- Names with the words "Trust," "Foundation" or "Endowment" will not be accepted.
- The name must be 40 characters or less, including spaces, and may not include punctuation or special characters.

### — DONOR-ADVISED FUND ROLES

- **Donor Advisors (Up to 4)**—Donor Advisors share equal privileges and responsibilities, with one serving as Primary Donor Advisor and our main point of contact. Donor Advisors may independently contribute to the fund, recommend grants, add or remove Additional Users, and change the fund name, succession plan, and investment selections. Donor Advisors may conjointly, with signatures from all, add and remove Donor Advisors.

- **Additional Users (Up to 6)**—Donor Advisors may name Additional Users to have limited fund access and privileges, based on the level selected. All Additional Users will be able to view DAF information through the online DAF portal.
  - **View Only**—User can only view grants, contributions, statements and correspondence
  - **Grant with Approval**—User can recommend grants that must be approved by a Donor Advisor
  - **Grant**—User can recommend grants
  - **Invest**—User can change investment selections
  - **Grant + Invest**—User can recommend grants and change investment selections

### — MINORS

Donor Advisors must be 18 years or older. Minors between the ages of 13 and 18 may be named as an Additional User if the legal guardian consents to the minor's participation in the HighGround DAF Program. Minors living in Louisiana may not be named as an Additional User, due to the state's laws. Minors may be named as Successor Advisors, to assume advisory privileges upon reaching the age of majority in the state in which they reside.

## ROLES & ACCESS LEVELS

FUND ACTIVITY	DONOR ADVISOR	ADDITIONAL USER				
		VIEW	GRANT WITH APPROVAL	GRANT	INVEST	GRANT + INVEST
VIEW FUND INFORMATION	X	X	X	X	X	X
UPDATE PROFILE INFORMATION	X	X	X	X	X	X
MAKE CONTRIBUTIONS	X	X	X	X	X	X
MAKE GRANT RECOMMENDATIONS	X		X	X		X
CHANGE INVESTMENT SELECTIONS	X				X	X
CHANGE SUCCESSION PLAN	X					
ADD OR REMOVE AN ADDITIONAL USER	X					
ADD OR REMOVE A DONOR ADVISOR*	X					

\*All Donor Advisors must sign and approve this fund activity.

## INVESTMENT FUND OPTIONS

HighGround Advisors offers professionally managed, proprietary multi asset class investment options for donor-advised funds as well as single asset class funds to create a customized investment strategy. You may choose the investment funds that align with your risk tolerance and expected giving time horizon, whether immediate or long-term. The percentages allocated to these investment options must total 100%. Actual asset allocation may vary from your current asset allocation due to market fluctuations and account activity.

Each investment fund's market value will be calculated daily and uploaded to your online DAF portal. Additionally, daily trading for each of these investment funds will be performed to invest contributions and to ensure sufficient dollars are available to fund grant requests. At the close of business each day, uninvested cash balances will be swept into the HighGround Enhanced Cash Fund. However, these funds are always accessible when you request a longer-term investment option.

### INVESTMENT FUND OPTIONS AS OF MARCH 31, 2026

#### MULTI-ASSET CLASS FUNDS

FUND NAME	RISK/TIME HORIZON	PERFORMANCE 1-YR	PERFORMANCE SINCE INCEPTION	INCEPTION DATE	EXPENSE RATIO*
HighGround Conservative Fund 20% Growth, 50% Fixed, 30% Cash	Low/Short	7.07%	4.66%	Mar-19	0.44%
HighGround Balanced Fund 50% Growth, 40% Fixed, 10% Cash	Moderate/Long	11.67%	7.40%	Mar-19	0.46%
HighGround Growth Fund 70% Growth, 25% Fixed, 5% Cash	Moderately High/Long	15.03%	7.87%	Mar-19	0.47%
HighGround Keystone Fund (Summit) 64% Growth, 25% Fixed, 10% Real, 1% Cash	Moderately High/Long	14.98%	7.89%	Nov-19	0.69%

#### SINGLE-ASSET CLASS FUNDS

HighGround Enhanced Cash Fund	Low/Short	3.65%	2.04%	Apr-05	0.31%
HighGround Bond Fund	Low/Short	4.69%	5.22%	Apr-95	0.43%
HighGround Liquid Real Assets Fund	Moderately High/Long	16.62%	6.90%	Jan-21	0.53%
HighGround Equity Index Fund	High/Long	17.58%	10.49%	Apr-95	0.12%
HighGround International Equity Fund	High/Long	22.25%	5.84%	May-95	0.70%

*These expense ratios do not include standard outside acquired fees that are passed through at cost. Contact our Senior Vice President and Chief Strategy Officer for additional information.*

*Can you rebalance your selected investment funds?*

Yes, if you choose to allocate your contributions into more than one investment fund, you will have the opportunity to rebalance your donor-advised fund when you wish to do so. Rebalancing your DAF will ensure that your preferred asset allocations are maintained. We recommend rebalancing after contributions are made and when grant recommendations have been issued.

## FEES & EXPENSES

### Administrative Fee

Most sponsoring organizations of DAFs charge an administrative fee on the market value of a donor-advised fund to cover expenses for tax receipt preparation, compliance, and the processing of contributions and grant recommendations. To maximize the charitable impact of your contributions, HighGround does not charge an administrative fee on our donor-advised funds. This means more dollars will go directly to the charities you choose to support with your DAF.

### Investment Expenses

Each investment fund option bears the cost of investment management, which is deducted directly from the daily net asset value of the investment fund. These costs are expressed as an expense ratio. Expense ratios are subject to change due to market fluctuations and changes in asset levels. The expense ratio for each investment fund option will be published quarterly, and the most current expense ratio can be found in the table on page 10.



# GIVE MORE WITH ZERO

\*Administrative fees are charged in accordance with HighGround's standard fee schedule. HighGround reserves the right to update its fees as necessary, and Donor Advisors shall receive thirty (30) days' notice of any changes prior to such fee changes being implemented.



## SUCCESSION PLAN

HighGround requires each donor-advised fund to have a succession plan in place, to be activated upon the death or incapacity of the last remaining Donor Advisor. Donor Advisors may name up to four Successor Advisors to assume fund advisory privileges and/or up to four Charitable Beneficiaries to receive final distributions from the fund. The combined percentages designated to all succession options must equal 100%.

If a Donor Advisor names Successor Advisors, the donor will then need to either:

- Select that the Successors Advisors are to [manage the existing DAF](#) or
- Allocate the percentage of the remaining balance to be used to [open a new DAF](#) for each Successor Advisor

Alternatively, Donor Advisors may establish a permanent endowment with the remaining balance of the fund to benefit up to four charities with periodic income distributions. At the death of the last remaining Donor Advisor, a minimum fund balance of \$25,000 is required to establish the endowment.

Donor Advisors should regularly review their fund information to ensure it is up to date. Succession plans may be modified at any time.

*Note: If no succession strategy is in place at the last remaining Donor Advisor's death, HighGround Advisors will distribute all remaining assets outright to charitable organizations that reflect the interests and concerns of the Donor Advisors, as indicated by recommendations and written communication during their lifetime.*

## ACKNOWLEDGMENT & SUBMISSION

To complete the application, you'll be asked to read and acknowledge the following:

- That you have read the HighGround Advisors Donor-Advised Fund Program Guide and agree to the terms described therein
- That the information you have provided is accurate and complete
- That you understand and agree that any contributions, once accepted by HighGround, represent an irrevocable contribution and are non-refundable

### Fund Review & Acceptance Policy

Once a donor-advised fund application is submitted, an internal HighGround team will review for approval. Generally, this process will be completed within one business day.

Once your application is approved, it must be signed by the Donor Advisor(s) electronically.



## CONTRIBUTIONS

Charitable organizations that serve as donor-advised fund sponsors, like HighGround, are required by the Internal Revenue Code to maintain legal control over all contributions. For this reason, all contributions, once reviewed and accepted into a DAF, represent an irrevocable gift. As such and as required by law, donors relinquish legal control over the contributed assets, meaning donors may not attach conditions to such assets and may not attempt to transfer, appoint, or otherwise utilize such assets for personal or non-charitable purposes.

### CONTRIBUTION TYPES

HighGround may review contributions to a donor-advised fund prior to accepting them. Generally, HighGround will accept contributions to donor-advised funds in the form of cash equivalents (physical check, wire, ACH or credit card), securities or mutual funds, and stock certificates held personally. Other contributions, such as real estate, oil and gas mineral interests, life insurance, tangible personal property, restricted stock and closely-held business interests, may only be accepted after a more thorough review by HighGround. If HighGround determines that a contribution will not be accepted, the donor will be notified.

#### — Publicly Traded Securities & Mutual Funds

Publicly traded securities and mutual funds may be contributed to a donor-advised fund. Donors must provide to HighGround the security/mutual fund name, account name, number of shares, custodian account number and the approximate dollar value of the contribution. HighGround will then provide further instructions so that the donor may initiate the transfer.

#### — Other Noncash Assets

If a Donor Advisor wishes to contribute stock certificates held personally or other noncash assets, such as real estate, mineral interests, life insurance policies, or closely-held business interests, please contact HighGround at 1.800.747.5564 for assistance.

### Asset Liquidation

Once assets have been accepted and received, it is HighGround's policy to liquidate the assets immediately and invest the net proceeds into the investment fund(s) requested by the Donor Advisor for their DAF. Though HighGround will attempt to liquidate contributed assets immediately, the actual timeframe for liquidation may vary depending on the feasibility of liquidation at a given time.

### Contribution Costs & Expenses

Contributions of securities may be subject to a standard brokerage fee or commission, and contributions made by credit card will incur a standard processing fee. Donors may opt to gross up their contribution to cover this additional expense. All costs and expenses incurred to receive a contribution will be assessed against the DAF to which the contribution was made. Contributions of other types of noncash assets (e.g., real estate) may be subject to other expenses. HighGround will discuss any potential expenses for accepting and/or liquidating contributions of complex assets with donors prior to accepting such a contribution.

### *How to make a contribution?*

A minimum contribution of \$1,000 is required for an individual to open a donor-advised fund. Additional contributions can be made easily through the online DAF portal. The owner(s) of the assets must transfer the assets to HighGround Advisors using the instructions provided on the following page.

Processing times for contributions vary based upon the asset type. Contributions made by check are generally deposited on the day they are received by HighGround Advisors, and trades are made in the investment fund(s) the following business day. If received prior to 11:00 am CST, contributions by wire are generally credited to the DAF that day and trades made accordingly. The timeframes noted assume receipt of all necessary documentation in good order from the contributor.

## CONTRIBUTION TYPES & TRANSFER INSTRUCTIONS

CASH EQUIVALENTS	
<p><b>CHECK DEPOSITS</b></p> <p>Mail your check to the address shown to the right.</p>	<p>HighGround Advisors P.O. Box 840350 Dallas, TX 75284-0350</p> <p><i>Make checks payable to HighGround Advisors.</i></p> <p><i>Reference your donor-advised fund name and account number on the check.</i></p>
<p><b>CREDIT CARD</b> (<i>Amex, Discover, Mastercard and Visa are accepted</i>)</p> <p>Complete the credit card form on the Contribute tab within your DAF portal.</p>	
<p><b>WIRE TRANSFERS</b></p> <p>Provide wire amount and bank information to HighGround. When prompted by HighGround, you may use the information to the right to initiate the wire transfer from your financial institution.</p>	<p>Bank of America, Dallas TX ABA # 026009593 For credit to HighGround Advisors Account # 0180144162</p> <p><i>Reference your donor-advised fund name and account number.</i></p>
<p><b>CASH ACH DEPOSITS</b></p> <p>Provide ACH amount and bank information to HighGround. When prompted by HighGround, you may use the information to the right to initiate the ACH transfer from your financial institution.</p>	<p>Bank of America Dallas TX ABA# 111000025 For credit to HighGround Advisors Account # 0180144162</p> <p><i>Reference your donor-advised fund name and account number.</i></p>
SECURITIES/MUTUAL FUNDS	
<p><b>SECURITIES/MUTUAL FUNDS</b></p> <p>Provide security/mutual fund name, account name, number of shares, custodian account number and the approximate dollar value to HighGround. HighGround will then provide further instructions so that you may initiate the transfer.</p>	
<p><b>STOCK CERTIFICATES HELD IN PERSONAL POSSESSION</b></p> <p>Provide the name of stock and number of shares to HighGround. HighGround will then provide further instructions so that you may initiate the transfer. Please contact HighGround at 1.800.747.5564 for assistance.</p>	
OTHER CONTRIBUTIONS	
<p><b>RESTRICTED STOCK, SHARES HELD AT THE COMPANY/TRANSFER AGENT, PRIVATE PLACEMENTS, STOCK FROM DIVIDEND REINVESTMENT PLANS (DRIPS) OR REAL ESTATE</b></p> <p>Please contact HighGround at 1.800.747.5564 to discuss next steps.</p>	

### Additional Contributions to Your Donor-Advised Fund

After making an initial contribution to open a DAF, additional contributions can be made at any time. Additional contributions will be invested according to the DAF's current investment selections, unless the Donor Advisor instructs otherwise.

### Third-Party Contributions

In addition to Donor Advisors, friends, family and other third-party contributors can make tax-deductible contributions to a DAF. Third-party contributions can be made online at [highgroundadvisors.org/make-a-third-party-contribution](http://highgroundadvisors.org/make-a-third-party-contribution).

*Note: Third-party contributors have no advisory privileges with respect to their contributions and may not recommend investment allocations or grants.*

### Approval & Confirmation of Contributions

Following review and acceptance of contributions, HighGround Advisors will provide written confirmation of each contribution to the contributor. The information contained on the confirmation will include the date the contribution was made and a description of the asset or security name. For gifts of cash, the amount of the contribution will be included in the acknowledgment.

### Contributions Rejected or Disallowed

HighGround Advisors reserves the right to reject any contribution. Should HighGround determine contributed assets are unacceptable, they will be returned to the Donor Advisor.

### Income Tax Considerations & Tax Forms

HighGround does not provide legal or tax advice to individuals, including Donor Advisors, but will provide more general information to assist the donor in decision-making, such as requirements for a gift to be tax-deductible, charitable deduction limits based on the donor's adjusted gross income, tax forms that may be required, the Internal Revenue Service (IRS) requirements for a qualified appraisal, projected tax implications of the gift being considered, and other pertinent information.

Please keep in mind the following general tax considerations:

- Donor Advisors who contribute appreciated assets held for more than a year generate a larger tax benefit than when contributing those assets held for a shorter period of time.
- Certain noncash assets being contributed require that you obtain an appraisal by a qualified appraiser.
- Once assets are contributed to a donor-advised fund, any subsequent income or capital gains generated by those assets belong to the DAF and, therefore, do not qualify as a deductible contribution for you.

HighGround suggests that you visit with your accountant or tax advisor to receive specific information on assets being contributed to a donor-advised fund.

The IRS has certain requirements regarding the assets being contributed to a donor-advised fund. The table below summarizes the contribution valuation provided by HighGround and other high-level requirements for assets that are used to fund a donor-advised fund.

#### CONTRIBUTION ACKNOWLEDGMENT SUMMARY\*

ASSET TYPE	CONTRIBUTION (GIFT) VALUATION	DONOR ACTION
CASH	Amount of cash contributed	Claim amount of cash contribution
PUBLICLY TRADED SECURITIES	Number of shares, market value based on average high and low trading prices on date received	Complete Form 8283 and file with IRS
MUTUAL FUNDS	Closing price on the day the contribution was received	Complete Form 8283 and file with IRS
CLOSELY-HELD STOCK, REAL ESTATE, MINERAL INTERESTS, LIFE INSURANCE	No valuation given	Consult with a Tax Advisor

\*Contribution acknowledgements should be read carefully and errors reported immediately to HighGround Advisors.

*“I’ve known about HighGround Advisors for years, but it wasn’t until recently that I realized they could facilitate a gift that would allow my family to use our blessings to fund our charitable giving throughout retirement. Since establishing our donor-advised fund, HighGround has managed to exceed my expectations with every facet of service. Their values, responsiveness and level of personalization have provided the perfect, tailor-made solution for our family.”*

MIKE WILLIAMS  
Retired President & Founding CEO  
Community Hospital Corporation



*“We want to be good stewards, and HighGround helps us know how to do that well. HighGround has served our family so well and has built the kind of trust that just keeps going. They do everything with excellence and really have a servant’s heart.”*

LEE & SUSAN BUSH  
Philanthropists

## GRANT RECOMMENDATIONS

Donor Advisors and any authorized Additional Users may recommend how funds are to be granted to IRS-recognized 501(c)(3) charities through the online DAF portal. Any grant recommendation made must equal \$100 or more to any one charity. To assist with identifying IRS-recognized charities, current HighGround clients and charitable beneficiaries have been pre-populated within the Organization Name field on the Make a Grant page of the DAF portal. Donor Advisors and Additional Users may also search the GuideStar database, which offers the most complete, up-to-date nonprofit data available. A link to GuideStar’s database appears next to the Organization Name field on the Make a Grant page of the DAF portal.

All grant recommendations will be subject to HighGround’s grant review and approval policy. This process ensures that all grants are made in accordance with IRS guidelines for grants from donor-advised funds and, further, that they align with HighGround’s mission and purpose. Grant recommendations to organizations whose activities or tax-exempt purposes are inconsistent with HighGround’s governing documents will not be approved.

Typically, grant recommendations will be reviewed and distributed within three business days, assuming all requirements are met. Any exceptions or questions that arise from the review will be resolved prior to the grant being approved and processed.

If the DAF is invested in more than one investment option, grant recommendations will come from the investment fund with the shortest expected giving time horizon first. When a Donor Advisor establishes recurring grants, a portion of their DAF balance may be kept in the Enhanced Cash Fund so that money is immediately available for those recurring grants.

## GRANT PURPOSE RESTRICTIONS

The Pension Protection Act of 2006 deems the following purposes impermissible for DAF grants:

- **Salary or Tuition**—Grants cannot be used for individual scholarships or to pay private school or college tuition.
- **Contributions to Individuals**—Grants to individuals are not allowed. Grants must be made to a qualified 501(c)(3) charity.
- **Quid Pro Quo Benefits**—Donors may not receive personal benefit (including goods and services) from grants.
- **Bifurcated Grants**—Grants cannot be used to pay any portion of a donation split into tax deductible and non-tax deductible portions.
- **Legally Binding Pledges**—Grants cannot be used to fulfill legally binding pledges.

## COMMUNICATION FOR APPROVED GRANTS

Grant distributions are typically made on HighGround-branded checks and are accompanied with a letter that contains information about the grant and the distributing donor-advised fund. The online DAF portal allows users to choose whether they would like their contact information released to the selected charity or to remain anonymous.

HighGround recognizes that many Donor Advisors may regularly communicate with charities supported by their DAF. However, Donor Advisors are not to:

- Attempt to modify the purpose of a grant after it has been distributed from a DAF,
- Attempt to exert control over the grants made from a DAF, or
- Attempt to divert the grant to an improper purpose.

Each time a grant recommendation is approved and distributed or rejected, the Donor Advisor will be notified.

*Can I transfer money I have in a DAF with a different sponsoring organization to a DAF with HighGround?*

Yes. While it is ultimately up to the sponsoring organization of your existing donor-advised fund, in most cases, you can transfer all or a portion of your funds to HighGround. If you would like to do so, please call David Slover, our Senior Vice President and Chief Strategy Officer, at 214.978.3311, and he will walk you through the simple process.

*Note: Since you received a tax deduction when you originally made the contribution to your existing DAF, you will not receive another after the transfer.*

## ADDITIONAL TERMS & GUIDANCE

- **ONLINE PORTAL:** Donor Advisors and Additional Users can manage the DAF online, whether initiating contributions, selecting investment funds or recommending grants. Additional DAF information is available on the online portal, such as:
  - Contribution and grant history
  - Contribution and grant acknowledgement letters
  - Quarterly and annual statements
  - Recent activity since the last quarterly statement
- **DAF STATEMENTS:** Your DAF statements will be generated and made available electronically on the online DAF portal within three to five business days after the close of each calendar quarter and calendar year. For any special requests regarding donor-advised fund statements, please call 1.800.747.5564 or email [dafs@highgroundadvisors.org](mailto:dafs@highgroundadvisors.org). Statements include:
  - DAF balance
  - Changes in DAF value
  - List of holdings with current market values
  - DAF activity, including transaction detail for contributions, grant distributions and investment funds
- **DAFS WITH NO ACTIVITY:** After a period of four years, if a DAF has no activity, HighGround will attempt to contact the Donor Advisors to inquire about their intentions regarding the DAF. Should contact attempts fail, HighGround reserves the right to take the following actions:
  - **Inactive DAFs with balances of \$10,000 or less—**  
HighGround will enact the DAF succession plan. If this plan does not direct grants to a qualified public charity or charities, the funds will be distributed in accordance with the last giving recommendation.
  - **Inactive DAFs with balances of \$10,000 or more—**  
HighGround will issue a grant in the amount equal to 5% of the DAF balance to the last known grant recipient on file annually, unless the succession plan includes establishing an endowment account.  
  
If an endowment account is named as the ultimate successor, then HighGround will proceed with the set-up of the endowment account on behalf of the Donor Advisor. The DAF will then be closed.
- **CONFLICT OF TERMS:** HighGround Advisors has taken care to ensure that all materials concerning the DAF Program displayed on the website, including the application, forms and the DAF Program Guide, contain consistent terms and information. In the event of any inconsistency between materials, HighGround reserves the right to make corrections.
- **ERRORS & DISCREPANCIES:** HighGround Advisors exercises care and due diligence in the administration of the Donor-Advised Fund Program. Donor Advisors are responsible for monitoring and reviewing information included on statements and other communications. Should a Donor Advisor discover any errors, omissions or other discrepancies relating to a fund, they are directed to contact HighGround Advisors at 1.800.747.5564 or [dafs@highgroundadvisors.org](mailto:dafs@highgroundadvisors.org) immediately after the communication containing the error is sent or made available. The absence of such notification within 90 days by a Donor Advisor indicates the agreement of all parties that all account activity and information is correct for all purposes.
- **GENERAL TERMS:** Donor-advised funds are subject to the terms and conditions of this Program Guide. HighGround Advisors reserves the right to modify these at any time without any notice.
- **GOVERNING LAW:** The HighGround Advisors Donor-Advised Fund Program Guide and any materials, forms or agreements executed by a Donor Advisor shall be governed by Texas law and federal tax law. This includes all contribution agreements, applications and instruction forms deemed to be entered in the State of Texas.  
  
All contributions and investments are intended to be administered and managed in the State of Texas.  
  
HighGround Advisors has contacted the 38 states and the District of Columbia that require registration or confirmation that HighGround is exempt from registration for solicitation of charitable contributions. All contributions received by HighGround Advisors are to be administered and managed in the State of Texas.
- **GRANTS TO INTERNATIONAL NONPROFIT CAUSES:** HighGround Advisors will only approve grants to qualified organizations that are tax-exempt under U.S. law. At this time, HighGround is unable to approve grants to international nonprofit organizations. Grants are allowed to U.S.-based charities providing international services and programs.

- **LOW & ZERO BALANCE ACCOUNTS:** On a quarterly basis, HighGround Advisors will review accounts that have a low and/or zero balance. If there has been no activity in a DAF in the form of contributions or grant recommendations for more than one year and the DAF has a balance of less than \$250, HighGround will attempt to contact Donor Advisors to inquire about their intentions regarding the DAF. Should contact attempts fail, HighGround reserves the right to close the DAF. HighGround will send a formal notification to the address on file for the DAF and then transfer any remaining balance to the HighGround Operating Fund prior to closing the account on the system.
- **UNCASHED OR LOST GRANT CHECKS:** If HighGround's records indicate that a grant check has not been deposited or cashed by the receiving organization within 90 days of the issue date, HighGround will attempt to contact the receiving charity to inquire about the status of the check. If appropriate, HighGround will initiate a stop-payment order on the check and forward a new check with a revised grant letter. If HighGround is unable to contact the receiving organization or is otherwise unable to find resolution for an uncashed check, HighGround will initiate a stop-payment order on the check and redeposit the amount into the fund.
- **WEB ACCESS:** HighGround Advisors offers secure online access for the Donor-Advised Fund Program. Donor Advisors and Additional Users can manage their DAFs online, whether initiating contributions, selecting investment funds or recommending grants. Use of the website may require you to provide certain personal details and other information. Prior to using the website, you will be asked to read and acknowledge our website [Terms & Conditions Policy](#).
- **WHISTLEBLOWER POLICY:** HighGround employs a Code of Ethics Policy to ensure that its business practices reflect the organization's commitment to honesty, integrity and transparency. In keeping with this commitment, HighGround maintains an internal Whistleblower Policy to encourage and enable HighGround directors, officers and employees to raise concerns regarding suspected illegal or unethical conduct or practices or violations of HighGround's policies. Each HighGround director, officer and employee has the responsibility to report in good faith any concerns about actual or suspected violations of HighGround's policies or any federal, state, or local law or regulation governing HighGround's operations. All complaints regarding financial improprieties, accounting or audit matters, ethical violations or other similar illegal or improper practices may be submitted to HighGround's Compliance Officer.

*General HighGround Donor-Advised Fund Policies:*

- Contributions to donor-advised funds are irrevocable and non-refundable.
- Types of contributions accepted may vary and have different acceptance requirements.
- HighGround Advisors does not provide investment, legal or tax advice on donor-advised funds.
- All investment funds are professionally managed by HighGround Advisors. Past performance does not guarantee future results.
- HighGround will generally approve grant recommendations made to eligible 501(c)(3) organizations with charitable missions and purposes that are not inconsistent with our governing documents.
- HighGround retains final authority over the distribution of grants recommended and the time required to process such grant recommendations may vary.
- Successor Advisors will not have access to the donor-advised fund assets until the succession plan is enacted.
- HighGround Advisors maintains exclusive legal control over assets contributed to a donor-advised fund.

HighGround's Compliance Officer will initiate a prompt investigation of all complaints submitted and may enlist HighGround employees and/or outside legal, accounting or other advisors, as appropriate, to conduct an investigation. Upon completion of the investigation, the Compliance Officer will recommend appropriate corrective action to the President or to the applicable Committee if warranted by the investigation.

FOR MORE INFORMATION:

DAVID M. SLOVER  
Senior Vice President and Chief Strategy Officer  
[david.slover@highgroundadvisors.org](mailto:david.slover@highgroundadvisors.org) | 214.978.3311

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