

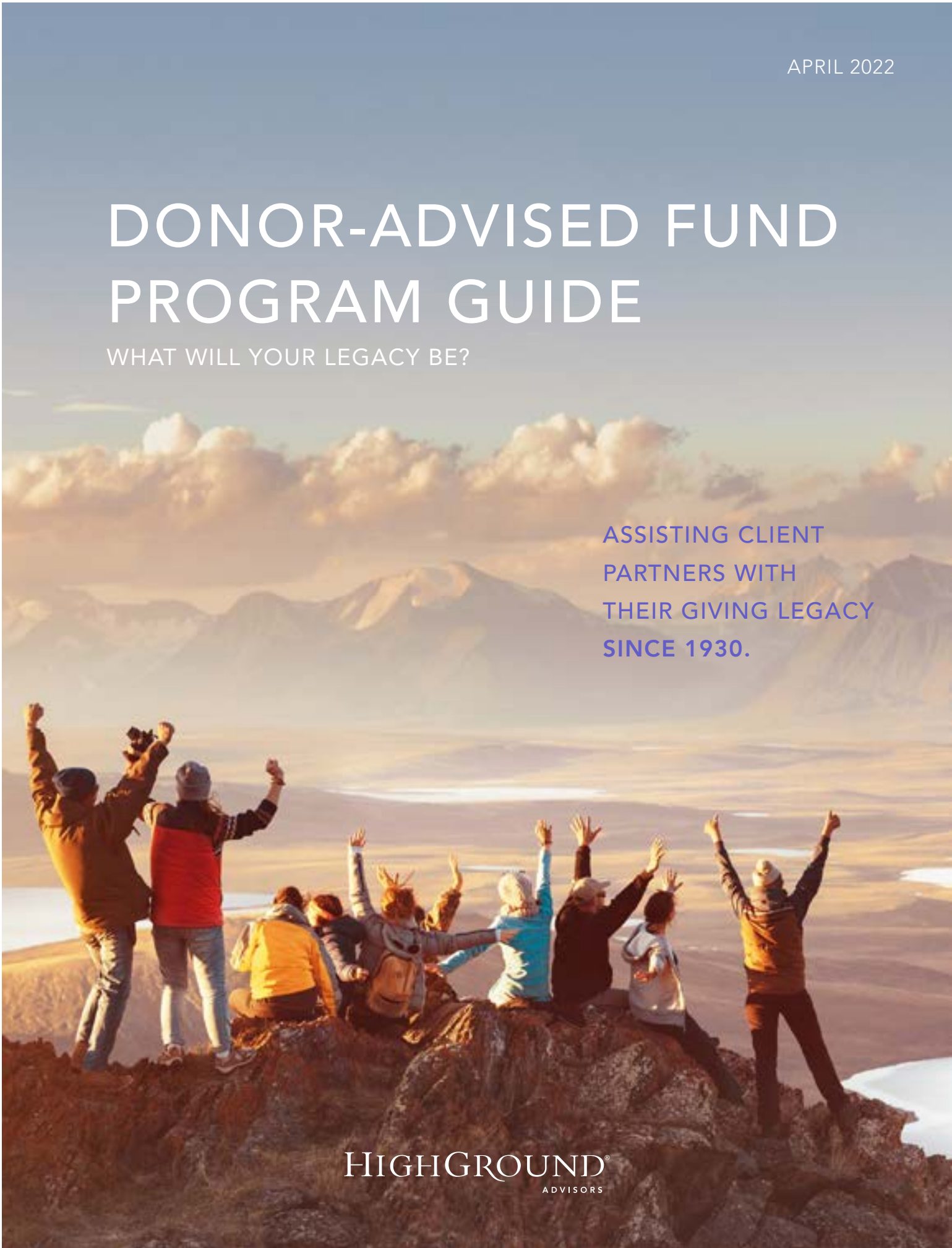
APRIL 2022

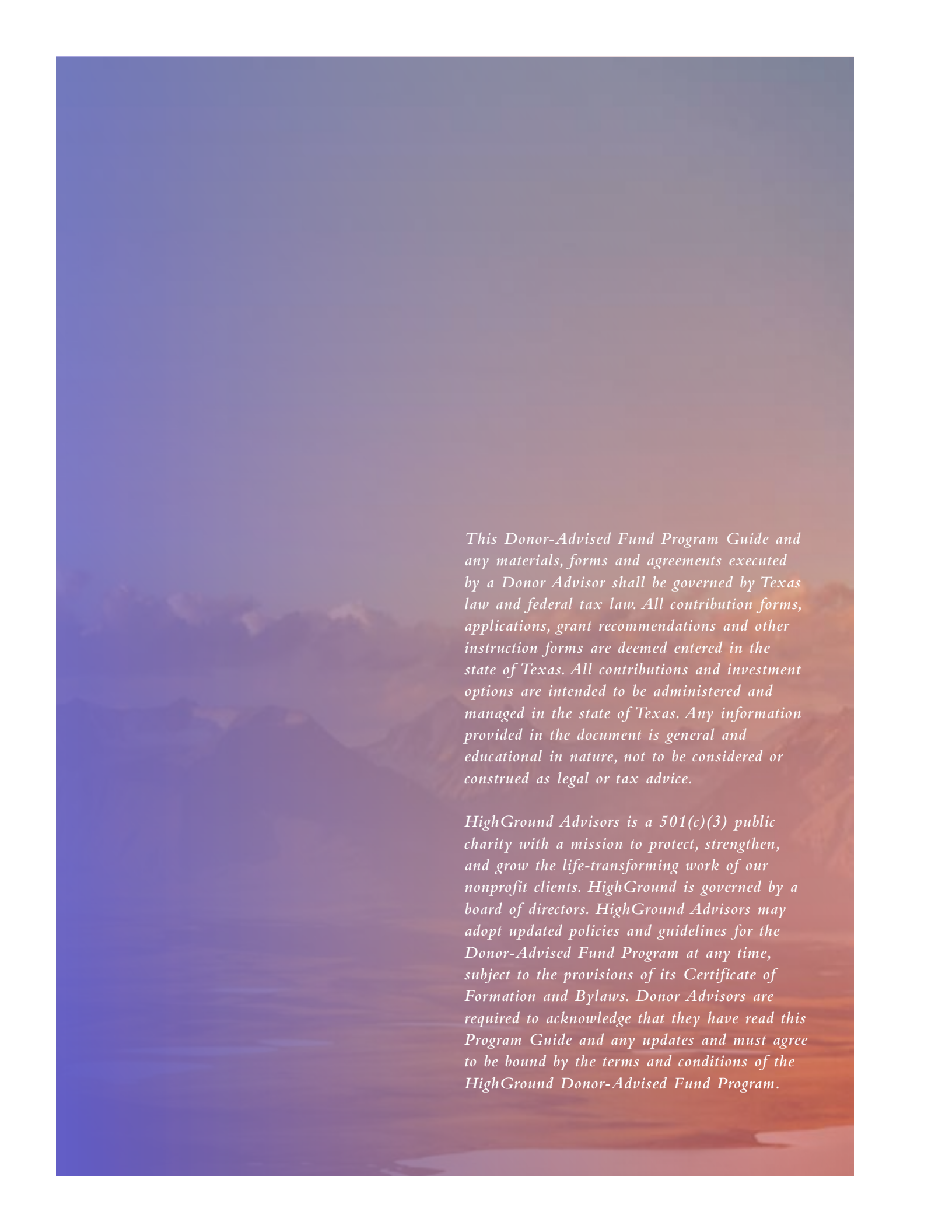
DONOR-ADVISED FUND PROGRAM GUIDE

WHAT WILL YOUR LEGACY BE?

ASSISTING CLIENT
PARTNERS WITH
THEIR GIVING LEGACY
SINCE 1930.

HIGHGROUND[®]
ADVISORS





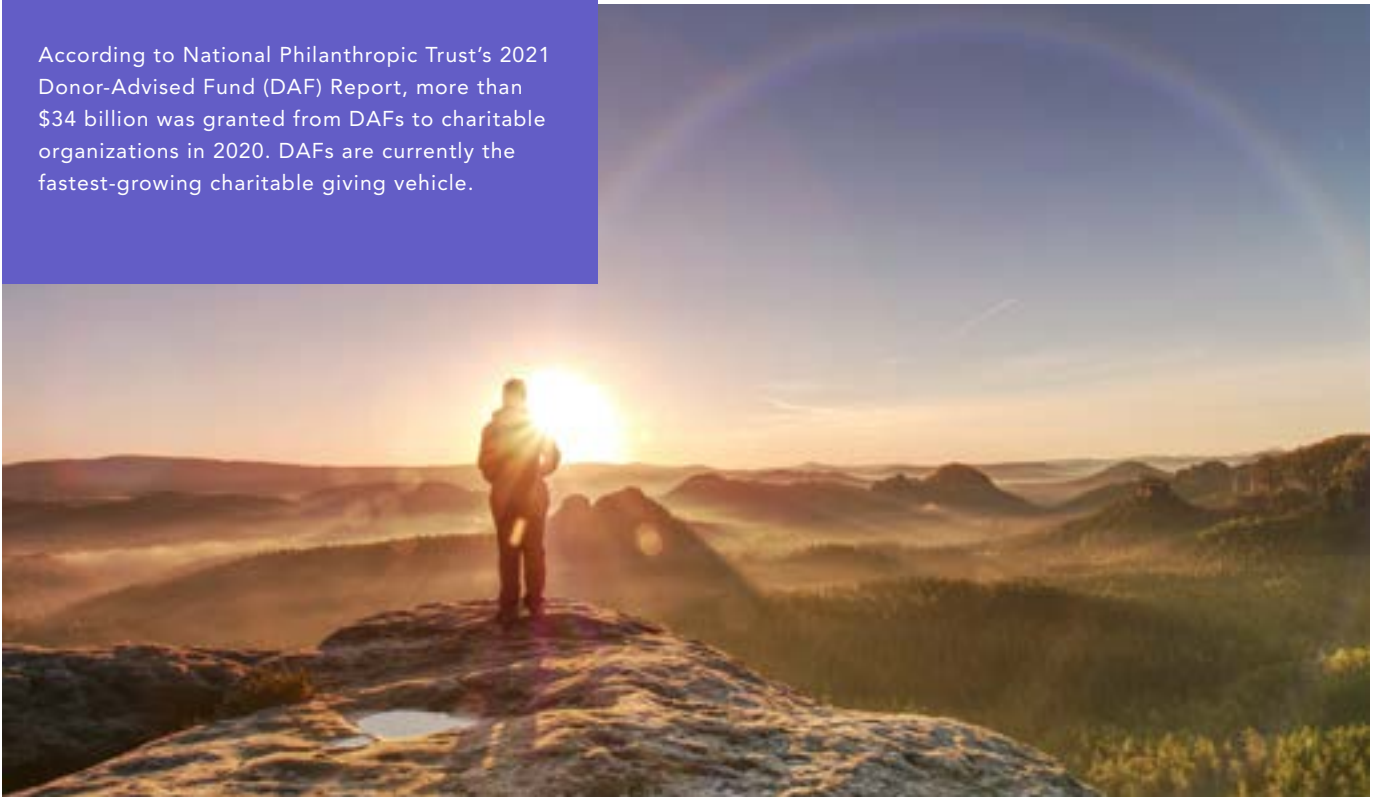
This Donor-Advised Fund Program Guide and any materials, forms and agreements executed by a Donor Advisor shall be governed by Texas law and federal tax law. All contribution forms, applications, grant recommendations and other instruction forms are deemed entered in the state of Texas. All contributions 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.

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According to National Philanthropic Trust's 2021 Donor-Advised Fund (DAF) Report, more than \$34 billion was granted from DAFs to charitable organizations in 2020. 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. Perhaps you desire to steward your resources for the benefit of others and are seeking a creative giving solution to help you meet your charitable objectives. HighGround Advisors' Donor-Advised Fund Program is one way we can enable you to maximize your impact. As one of the most flexible charitable giving vehicles, a donor-advised fund is an increasingly popular way for individuals to benefit charitable organizations in the near term or over a period of years.

In this guide, you will find details about creating and maintaining your donor-advised fund. You will learn about the different types of assets you can contribute to your DAF and how to recommend grants to the charitable organizations that matter most to you.

To connect with us, call 1.800.747.5564 Monday through Friday between 8:30 am and 5:00 pm CST or email us at dafs@highgroundadvisors.org. Additional information may be found on our website at 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 and charitable giving firm with \$2.5 billion in assets. We are committed to advancing the missions of nonprofit organizations by providing asset management, gift planning and account support services. Additionally, we help those who desire to financially support charitable organizations find creative giving solutions to fulfill that calling.

At HighGround, our team of expert lawyers is equipped to structure and implement a wide range of giving options for you, from gifts of cash and securities to charitable gift annuities and donor-advised funds. A donor-advised fund is one vehicle that can maximize your giving to charities that share your values. With our Donor-Advised Fund Program, you'll have the tools, resources and support necessary to make strategic charitable giving decisions.

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:

- [Annual Reports](#)
- [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 embrace our Christian heritage and guide us as we work with those who are transforming lives.

We partner with our clients. We serve one and all with equal enthusiasm and commitment.

WE PUT THE CLIENT FIRST.

We are not in this for our own good. We are in it for the good of our clients.

WE ARE SERVANT HEARTED.

We serve our clients with the spirit of respect, transparency and honesty.

WE ACT WITH INTEGRITY.

We treat challenges as opportunities to enable our clients—who are actively making a difference today—to make an even greater difference tomorrow.

WE PROMOTE INNOVATION.

We deliver rock-solid thinking, wisdom and insight to our clients.

WE ARE VISIONARY.

We exhibit high standards, because ours is a high calling.

WE LEAD WITH PROFESSIONAL EXCELLENCE.

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

- 1. GIVE ANYTIME, ANYWHERE**
With HighGround's online DAF dashboard, you can recommend grants to qualified 501(c)(3) charities at any time.
- 2. GROW YOUR GIVING**
Depending on your giving horizon, choose from HighGround's five professionally managed investment solutions to ensure that your donor-advised fund is optimally invested.
- 3. SIMPLIFY TAX SEASON**
When your charitable giving is streamlined through your DAF, you only have one tax receipt at the end of the year.
- 4. DEDICATED SUPPORT**
With our Client Partner Communications Specialist 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.
- 5. 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.
- 6. NONPROFIT EXPERTISE**
As a nonprofit ourselves, we know first-hand the unique challenges nonprofits face. HighGround also has well-established relationships with over 450 qualified charities and may already be the trusted investment advisor of the charity you wish to benefit. Our unmatched knowledge of nonprofit investment management has fostered long-term partnerships with our clients – some since 1930.
- 7. SOCIALLY SCREENED FUNDS***
HighGround investment funds are screened to restrict companies whose business activities are inconsistent with Christian faith and values.
- 8. INVESTMENT EXPERTISE**
HighGround's in-house team has over 100 years of combined nonprofit investment experience and is supported by 30+ world-class investment managers.
- 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. TRUST & LEGAL GUIDANCE**
For 90 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.



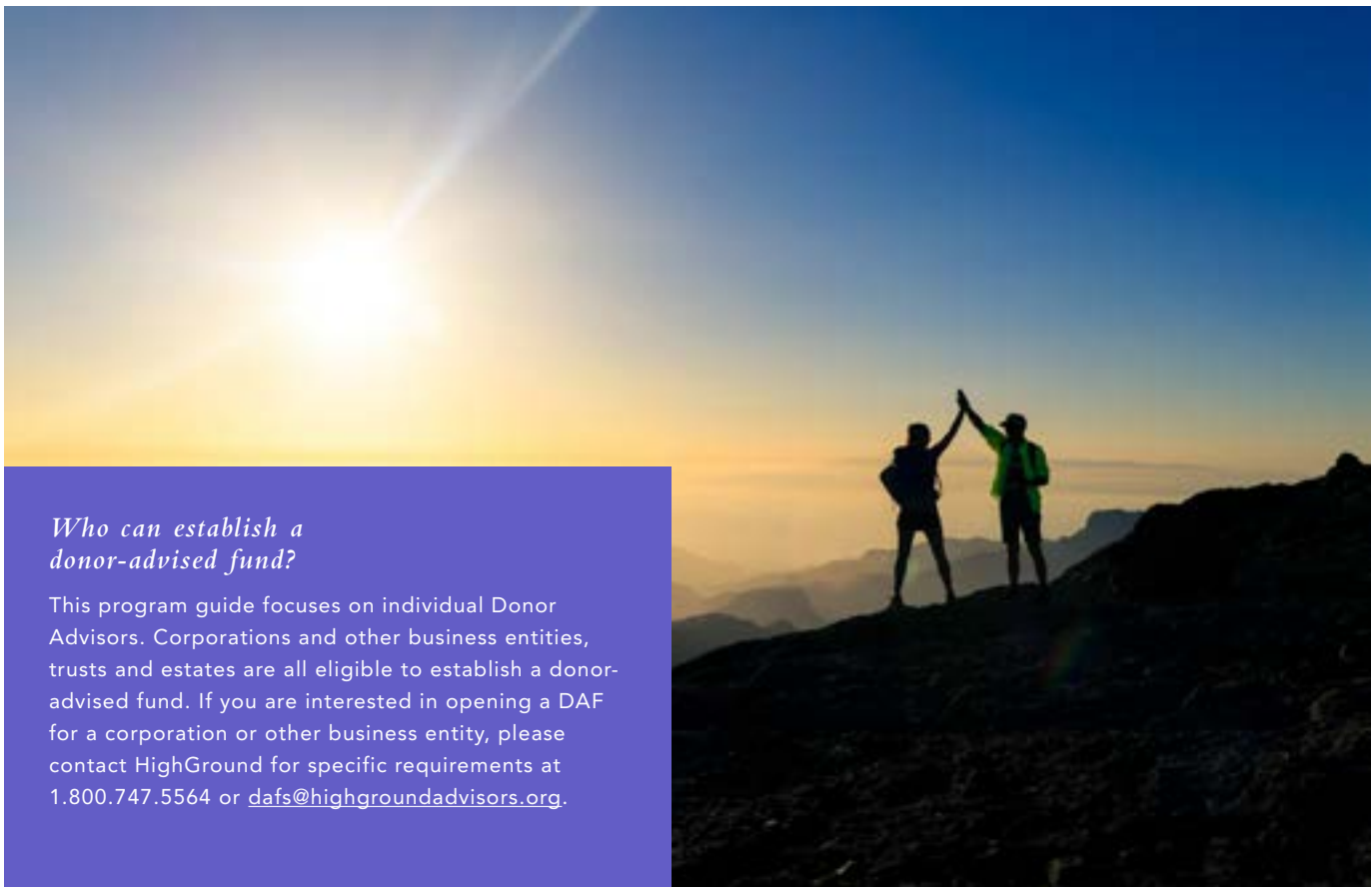
3. GRANT

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
Receive an immediate tax deduction each time you make a contribution	Complement your other giving strategies	Monitor your fund balance, contributions and grant history with online account access
Contribute appreciated assets, such as securities, mutual funds or real estate, to reduce capital gains tax	Select investment options that align with your risk tolerance & expected giving time horizon	Receive a single contribution gift receipt and avoid handling all account administration
Avoid estate taxes on contributed assets	Choose to receive recognition or to remain anonymous with each grant	Consolidate personal giving by channeling through a single donor-advised fund
Grow your donation, tax-free	Create a legacy of giving for your family with a DAF succession strategy	Recommend grants to qualified 501(c)(3) charities at any time



Who can establish a donor-advised fund?

This program guide focuses on individual Donor Advisors. Corporations and other business entities, trusts and estates are all eligible to establish a donor-advised fund. If you are interested in opening a DAF for a corporation or other business entity, please contact HighGround for specific requirements at 1.800.747.5564 or dafs@highgroundadvisors.org.

HERE'S WHAT YOU NEED:

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

- Permanent U.S. resident address, social security number, date of birth and contact information for each named Donor Advisor and Individual Successor
- A name for the donor-advised fund
- Funding information for the assets you elect to contribute to your fund
- A succession strategy for your donor-advised fund and the Employer Identification Number (EIN) for each named Charitable Organization Successor

To open a donor-advised fund, a minimum, irrevocable contribution of \$10,000 is required. Additionally, a signature from each named Donor Advisor will be required once your application is approved.

WE'RE HERE TO HELP:

Should you desire assistance during the application process, our Client Partner Communications Specialist is ready to serve you:

- Katie Warren
214.978.3303
katie.warren@highgroundadvisors.org or
dafs@highgroundadvisors.org
- HighGround Advisors
1717 Main Street, Suite 1400
Dallas, Texas 75201-4622

ESTABLISHING YOUR DONOR-ADVISED FUND

To establish your donor-advised fund (DAF), please visit highgrounddafs.org. The DAF portal provides secure access to:

- Complete an application
- Open a fund
- Contribute to the fund
- Select investment options
- Establish a succession strategy
- Make grant recommendations

When you are ready, click on the **Get Started** button found at highgroundadvisors.org. To begin, you must first create a DAF portal login by providing your name, an email address for your username and a password. Once this information is submitted, you will receive an email confirmation with a link to activate your DAF portal and complete the donor-advised fund application.

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.

FUND NAME & DONOR ADVISOR INFORMATION

Completing a donor-advised fund application is easy and, generally, takes about ten minutes after you’ve activated your DAF portal. Please complete an application online with all the information requested below:

— NAMING THE FUND

Please start your fund name with “The” and end with “Fund” (e.g. The Smith Family Fund). If you do not select “The” or “Fund” at the time you complete the application, HighGround will automatically add these words to the fund name. Many choose to name the fund after their family or favorite charity. Names with the words “Trust,” “Foundation” or “Endowment” are not accepted. HighGround reserves the right to reject a fund name if it is deemed to be inappropriate. The fund name will appear on all correspondence, including the letters sent to charities receiving grants issued from the fund. Of course, we will always honor your request if you decide to anonymously make grants.

— DONOR-ADVISED FUND ROLES

- **Primary Donor Advisor**—The individual establishing a DAF, will serve as the Primary Donor Advisor. The Primary Donor Advisor will hold the primary relationship with HighGround Advisors and will receive all correspondence directly via email. Should there be any, all mailed communication will be addressed to the Primary Donor Advisor’s household if a spouse is named as a Secondary Donor Advisor.
- **Secondary Donor Advisors**—The Primary Donor Advisor may appoint up to three individuals, typically a spouse and/or children, to share full editing rights and grant recommendation privileges for the donor-advised fund. Secondary Donor Advisors will have access to correspondence through the online DAF dashboard. Secondary Donor Advisors can only be added or removed after HighGround receives written consent from all Donor Advisors on the DAF, acknowledging the addition or removal. *Note: Minors who wish to open a DAF must do so through their legal guardian. Please contact HighGround Advisors to discuss next steps.*
- **Interested Parties**—The Donor Advisors may also provide account access for up to two trusted individuals as Interested Parties (e.g. financial advisors, CPAs or attorneys). These individuals will have limited access and privileges, as noted in the table below.

This section of the online application will include a field called “Fund Privileges.” All Donor Advisors have Donor Advisor Full privileges to view, make changes and recommend grants. Interested Parties can either have Interested Party View privileges to view grants, contributions and correspondence but only make changes to the investment selections or Interested Party Grant privileges, which include all the privileges of Interested Party View as well as the right to recommend grants.

ROLES & ACCESS LEVELS

FUND ACTIVITY	DONOR ADVISOR	INTERESTED PARTY	INTERESTED PARTY
	FULL	VIEW	GRANT
LOG IN & ACCESS FUND	X	X	X
MAKE CONTRIBUTIONS	X		
MAKE GRANT RECOMMENDATIONS	X		X
RECOMMEND INVESTMENT OPTIONS	X	X	X
RECEIVE & REVIEW CORRESPONDENCE	X		
DESIGNATE & CHANGE SUCCESSION PLAN*	X		
APPOINT OR REMOVE AN ADVISOR*	X		
NAME INTERESTED PARTIES*	X		
UPDATE DAF CONTACT INFORMATION	X		
REVIEW TRANSACTION HISTORY	X	X	X

*All Donor Advisors must sign and approve this fund activity



SUCCESSION STRATEGIES

HighGround requires each donor-advised fund to have at least one succession strategy to be activated upon death, incapacity or other disqualification of the last remaining Donor Advisor on the donor-advised fund. The selected strategy(ies) can be made for all or a portion of the DAF and the total percentage of elections must add to 100%. HighGround offers 3 succession strategies to choose from:

- **Identify an Individual**—Donor Advisors may select up to four individual(s) who will be given the option to either:
 - Make a final grant recommendation(s) for the funds designated
 - Open a new donor-advised fund with the designated funds and assume all Primary Donor Advisor privileges of the new DAF
- **Designate a Charitable Organization**—Donor Advisors may select up to four IRS-qualified public charities to receive a designated percentage of the remaining balance in the donor-advised fund after the death of the last remaining Donor Advisor.
- **Establish a Permanent Endowment (Lasting Legacy Fund)**—Donor Advisors may elect to establish a permanent endowment/legacy fund with the remaining balance in the donor-advised fund to benefit one or more charities. At the death of the last remaining Donor Advisor, a minimum DAF balance of \$25,000 is required for the endowment to be established. If this option is selected, the Primary Donor Advisor will be asked to complete a form to designate charitable beneficiaries. Monthly income distributions will be made to the designated charities.

Donor Advisors should regularly review their fund information to ensure it is up to date. Successor information may be added, modified or revoked at any time using the [Succession Strategy Change Form](#).

Note: If no succession strategy is in place at the last remaining Donor Advisor's time of 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.

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.

How to make a contribution?

A minimum contribution of \$10,000 is required for an individual to open a donor-advised fund. Contributions may be initiated online at the time the fund is established and additional contributions can be made easily on the online DAF dashboard. The owner(s) of the assets must transfer the assets to HighGround Advisors using the instructions provided on the following pages.

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

ASSET TYPE	REQUIRED INFORMATION	TRANSFER INSTRUCTIONS
CASH EQUIVALENTS		
CHECK DEPOSITS	<p>INITIAL CONTRIBUTION: Complete the check amount field when completing the application. Upon approval of your application, please submit your check to the address shown to the right.</p> <p>SUBSEQUENT CONTRIBUTIONS: Submit your check to HighGround Advisors using the address shown to the right.</p>	<p>HighGround Advisors P.O. Box 840350 Dallas, TX 75284-0350 Ref: (Donor-Advised Fund Name) <i>Make checks payable to HighGround Advisors</i></p>
CREDIT CARD/ E-CHECK (Amex, Discover, Mastercard and Visa are accepted)	<p>INITIAL CONTRIBUTION: Complete all required fields when completing the application to process your contribution.</p> <p>SUBSEQUENT CONTRIBUTIONS: Complete credit card or bank fields on the Contribute tab within your DAF dashboard.</p>	
WIRE TRANSFERS	<p>INITIAL CONTRIBUTION: Provide wire amount and bank information when completing the application. Upon approval of your application, please engage your financial institution to initiate the transfer of your initial contribution.</p> <p>SUBSEQUENT CONTRIBUTIONS: Complete and submit a Contribution Form located on the Forms tab.</p>	<p>Bank of America, Dallas TX ABA# 026009593 For credit to HighGround Advisors Account # 0180144162 Ref: (Donor-Advised Fund Name)</p>
CASH ACH DEPOSITS	<p>INITIAL & SUBSEQUENT CONTRIBUTIONS: Please contact a HighGround representative at 1.800.747.5564 or dafs@highgroundadvisors.org to discuss how to set these up.</p>	<p>Bank of America Dallas TX ABA# 111000025 For credit to HighGround Advisors Account # 0180144162 Ref: (Donor-Advised Fund Name)</p>

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, credit card or electronic check), 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. A Donor Advisor may indicate the securities or mutual funds being contributed on the online application, but the contribution will not be initiated until the Donor Advisor contacts their broker to transfer the assets using the instructions noted in the table above and on the following page.
- **Other Noncash Assets**
If a Donor Advisor wishes to contribute stock certificates held personally in certificate form 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 TYPE	INFORMATION NEEDED	TRANSFER INSTRUCTIONS
SECURITIES/MUTUAL FUNDS		
SECURITIES/ MUTUAL FUNDS	<p>INITIAL CONTRIBUTION: Provide security/mutual fund name, account name, number of shares, custodian account number and the approximate dollar value when completing the application. Upon approval of your application, HighGround will notify you so that you may initiate the transfer of your securities or mutual funds from your financial institution.</p> <p>SUBSEQUENT CONTRIBUTIONS: Complete and submit an additional Contribution Form located on the Forms tab.</p>	<p>UBS Financial Services Inc. Account Name: HighGround Advisors DTC # 0221 Account # PE 02188 Ref: (Donor-Advised Fund Name)</p>
STOCK CERTIFICATES HELD IN PERSONAL POSSESSION	<p>INITIAL CONTRIBUTION: Provide the name of stock and number of shares when completing the application. Upon approval of your application, HighGround will send you instructions so that you may initiate the transfer.</p> <p>SUBSEQUENT CONTRIBUTIONS: Complete and submit an additional Contribution Form located on the Forms tab.</p>	<p>Please contact HighGround at 1.800.747.5564 for assistance.</p>
OTHER CONTRIBUTIONS		
RESTRICTED STOCK, SHARES HELD AT THE COMPANY/TRANSFER AGENT, PRIVATE PLACEMENTS, STOCK FROM DIVIDEND REINVESTMENT PLANS (DRIPS) OR REAL ESTATE	<p>INITIAL CONTRIBUTION: Select the Other Contributions box on the application. Upon approval of your application, a HighGround representative will reach out to you.</p> <p>SUBSEQUENT CONTRIBUTIONS: Please contact a HighGround representative at 1.800.747.5564 or dafs@highgroundadvisors.org to discuss next steps.</p>	

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 or e-check 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.

Additional Contributions to Your Donor-Advised Fund

After making an initial contribution to open a DAF, additional contributions can be made at any time with a minimum amount of \$1,000.00. Additional contributions will be invested according to the DAF's current investment selections, unless the Donor Advisor instructs otherwise.

Third-Party Contributions (friends of)

In addition to Donor Advisors, friends and family can make contributions to your DAF for birthdays, anniversaries and memorials. A minimum contribution of \$25.00 is required. In this case, HighGround requests that notice of a contribution be provided in advance to ensure proper and timely processing of the contribution. Third-party contributions can be made online at 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 and Primary Donor Advisor. 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 these 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, and other pertinent information, such as projected tax implications of the gift being considered.

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 (GIFT) ACKNOWLEDGMENT SUMMARY*

ASSET TYPE	CONTRIBUTION (GIFT) VALUATION	DONOR ACTION
CASH	Amount of cash contributed	Claim amount of cash contribution (gift)
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 (gift) 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

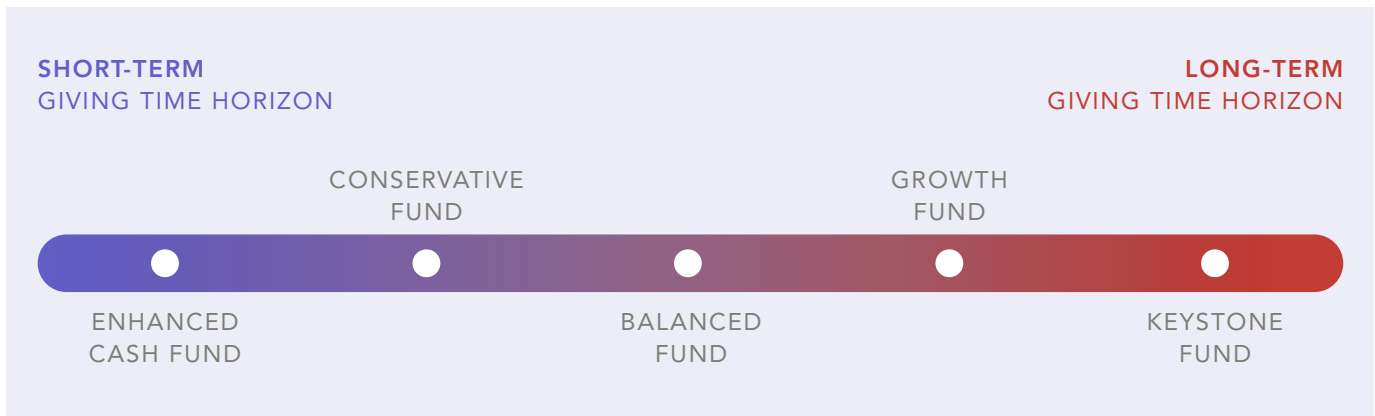


INVESTMENT FUND OPTIONS

HighGround Advisors offers five professionally managed, proprietary investment options for donor-advised funds. You may choose up to two investment funds that align with your risk tolerance and expected giving time horizon, whether immediate or long-term. The percentages allocated to these two investment options must add to 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 into your online DAF dashboard. 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 JANUARY 1, 2022	APPROXIMATE ASSET ALLOCATION	EXPECTED GIVING TIME HORIZON	EXPENSE RATIO
HIGHGROUND ENHANCED CASH FUND	100% Cash	< 2 YEARS	0.38%
<p>The HighGround Enhanced Cash Fund provides diversified investment exposure to U.S. investment grade money market and short to medium-term fixed income securities, including U.S. Treasury, mortgage, corporate and municipal bonds. The Fund is managed as a fund-of-funds and seeks to earn current yields in excess of money market rates, while also providing preservation of principal, daily liquidity and a constant net asset value. The Fund is constructed by combining a prime money market portfolio and a high quality, higher yielding, low duration fixed income portfolio. The fixed income portfolio has credit quality, duration and sector exposures similar to the ICE BofAML Corporate & Government 1-3 Year Index. This investment option is used within donor-advised funds for individuals with a grant-making time horizon of two years or less.</p>			
HIGHGROUND CONSERVATIVE FUND	20% Growth, 50% Fixed, 30% Cash	1 – 5 YEARS	0.47%
<p>This Fund seeks to employ a diversified, multi-asset class strategy with a risk and return profile that aligns with a short-term grant-making time horizon of five years or less. The Fund's investments typically include U.S. domestic equities, U.S. domestic fixed income and cash. The Fund will generally have the following key strategic attributes:</p> <ul style="list-style-type: none"> — Significant allocation to precautionary investments expected to protect against macroeconomic shocks of inflation and deflation — Small allocation to equity, which acts as the Fund's main growth driver — Broad diversification by asset class, geography and sector — Daily liquidity to fund charitable grants 			
HIGHGROUND BALANCED FUND	50% Growth, 40% Fixed, 10% Cash	5 – 10 YEARS	0.52%
<p>This Fund seeks to employ a globally diversified, multi-asset class strategy with a risk and return profile that aligns with a grant-making time horizon of five to ten years. The Fund's investments typically will include a balanced portfolio of U.S. domestic and international equities, U.S. domestic fixed income, and cash. The Fund will generally have the following key attributes:</p> <ul style="list-style-type: none"> — Allocation to equity, which acts as the Fund's main growth driver — Allocation to precautionary investments expected to protect against macroeconomic shocks of inflation and deflation — Broad diversification by asset class, geography and sector — Daily liquidity to fund charitable grants 			
HIGHGROUND GROWTH FUND	70% Growth, 25% Fixed, 5% Cash	> 10 YEARS	0.76%
<p>The Fund seeks to employ a globally diversified, multi-asset class strategy with a risk and return profile that aligns with a grant making time horizon of more than 10 years. The Fund's investments typically include U.S. domestic and international equities, U.S. domestic and global fixed income and cash. The Fund will generally have the following key strategic attributes:</p> <ul style="list-style-type: none"> — Significant allocation to equity which acts as the Fund's main growth driver — Precautionary investments expected to protect against macroeconomic shocks of inflation and deflation — Broad diversification by asset class, geography and sector — Daily liquidity to fund charitable grants 			
HIGHGROUND KEYSTONE FUND	64% Growth, 25% Fixed, 10% Real, 1% Cash	> 10+ YEARS	0.83%
<p>The HighGround Keystone Fund provides a globally diversified, multi-asset class strategy with no exposure to private or alternative investments and is the optimal choice for Donor Advisors who wish to provide an endowment feature within their donor-advised fund. The Fund has a risk and return profile that aligns with the perpetual investment horizon and long-term objectives of endowment assets and is managed as a fund-of-funds using HighGround's public equity and fixed income investment funds.</p>			



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
- That you agree that you will promptly notify HighGround in writing of any changes pertaining to this application

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. A PDF of your final application can be found on your online DAF dashboard under the My Profile tab and Fund Documents.

Can you rebalance your selected investment funds?

Yes, if you choose to allocate your contributions into two investment funds, 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, when grant recommendations have been issued and when administrative fees have been deducted.

FEES & EXPENSES

ADMINISTRATIVE FEE

HighGround incurs administrative expenses to cover online donor services, personal consultation, compliance, general grant support and gift and grant processing associated with operating a DAF program.

Administrative fees will be calculated based on the market value of the fund as of the last business day of each month and deducted from each DAF on the first business day of the following month.

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 is included below.

DONOR-ADVISED FUND ADMINISTRATION FEE (AS OF AUG 1, 2019):

First	\$1,000,000	0.60%
Next	\$1,000,000	0.40%
Next	\$3,000,000	0.30%
Thereafter		fees negotiable

Minimum fee: \$300 per year

INVESTMENT FUND EXPENSE RATIOS (AS OF JANUARY 1, 2022)

HIGHGROUND ENHANCED CASH FUND	0.38%
HIGHGROUND CONSERVATIVE FUND	0.47%
HIGHGROUND BALANCED FUND	0.52%
HIGHGROUND GROWTH FUND	0.76%
HIGHGROUND KEYSTONE FUND	0.83%

ADMINISTRATION FEE

(DEDUCTED FROM YOUR DAF)

INVESTMENT EXPENSES

(DEDUCTED FROM EACH INVESTMENT FUND'S NAV)

= TOTAL ANNUAL COST

GRANT RECOMMENDATIONS

Donor Advisors and any authorized Interested Parties may recommend how funds are to be granted to IRS-recognized 501(c)(3) charities from the online DAF dashboard. Any grant recommendation made must equal \$100.00 or more to any one charity. To assist with identifying IRS-recognized charities, all current HighGround clients have been pre-populated within the Organization Name field under the Make A Grant tab on the DAF dashboard. Donor Advisors and Interested Parties may also search the GuideStar database, which offers the most complete, up-to-date nonprofit data available. A direct link to GuideStar appears in the Organization Name field once the beginning of a charity name has been entered.

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 one to two 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 two investment options are chosen, please keep in mind that grant recommendations will come from the investment fund with the shortest expected giving time horizon first.

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 our Client Partner Communications Specialist, Katie Warren, at 214.978.3303, and she 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.

GRANT PURPOSE RESTRICTIONS

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

- **Enforceable Pledges**—Grants cannot be used to satisfy a legally binding pledge.
- **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 go 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.

COMMUNICATION FOR APPROVED GRANTS

Grant distributions are typically made on HighGround-branded checks and are accompanied with a letter that contains certain information about the Donor Advisor who recommended the grant. The online DAF dashboard provides Donor Advisors with the ability to choose whether they would like their contact information released to the selected charity or if they wish to remain anonymous. The contact information provided to the charity will include the Donor Advisor's name, the DAF name (i.e. "The Smith Family Fund") and an address, unless specified differently within the Notes section of the grant recommendation.

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.

ADDITIONAL TERMS & GUIDANCE

- **ONLINE DASHBOARD:** Donor Advisors and Interested Parties can manage their DAFs online, whether initiating contributions, selecting investment funds or recommending grants. Additional DAF information is available on the online dashboard such as:
 - Email correspondence and change forms
 - Letters acknowledging DAF contributions and charity grant notification letters
 - Grant recommendation history
 - Quarterly statements which show changes in the DAF's value, the asset allocation and other details related to the DAF's investments
 - Annual statements which summarize contributions, grants made during a calendar year and the ending market values of the investments held
- **DAF STATEMENTS:** Your DAF statements will be generated and made available electronically on the online DAF dashboard 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. 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 last known succession strategy on file for this DAF. 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 final succession strategy 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 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 DAF holder 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 \$250.00, 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. 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](#). Donor Advisors and Interested Parties can manage their DAFs online, whether initiating contributions, selecting investment funds or recommending grants.
- **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.
- Successors will not have access to the donor-advised fund assets until the succession strategy is engaged.
- 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 | 214.978.3311

KATIE WARREN
Client Partner Communications Specialist
katie.warren@highgroundadvisors.org | 214.978.3303

HIGHGROUND[®]
ADVISORS

Protect. Strengthen. Grow.[®]

1717 Main Street | Suite 1400 | Dallas, Texas 75201-4622
214.978.3300 | 800.747.5564 | highgroundadvisors.org