



Global *Cause Vetting*

Cause Inclusion Overview

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Benevity Cause Validation Overview

Benevity's platform and our donation fund disbursement model have been designed to scale for unlimited usage in any program featuring the donation capability. Our platform enables any number of people to easily find and donate to the causes of their choice. And they can do this in a manner that reduces the overall administrative burden for companies, donors and recipient causes, while having confidence in the eligibility of participating organizations.

To ensure eligibility, our processes provide multiple layers of verification and vetting for all recipient organizations before any funds are disbursed. The automated, aggregated process that drives efficiencies for causes simultaneously reduces the reputational risk for companies.

Vetting for Charitable Organizations

Benevity verifies the charitable status of all recipient organizations in our portal prior to disbursing any donation funds. The following process outlines the engagement path and verification steps that we take to ensure that an organization is searchable, authenticated and available for disbursement.

Importing Databases

Benevity updates part of its cause database using recognized global lists of causes in good standing. These lists are compiled by the relevant agencies in each country and require each charitable organization to meet country-specific compliance guidelines to remain included in the most recent version. Benevity imports the updated lists on a regular basis, when available for the respective country.

Each database is received, prepared and processed in line with the update process and schedule provided by each local regulatory authority and ingested directly through a proprietary internal processor — our Cause Importer.

US Databases

Benevity follows the guidelines established for organizations to have tax-effective charitable status in the United States and therefore can include in our database all eligible 501(c)(3)s, governmental entities, educational institutions, schools from the NCES database and religious organizations. We established the Benevity Causes Portal database by syncing:

- IRS Business Master File of Exempt Organizations
- United States Conference of Catholic Bishops (Private)

To ensure that only those causes in good standing with the IRS are included in our database, each month Benevity syncs with the IRS Business Master File of Exempt Organizations. Benevity's sync with the United States Conference of Catholic Bishops (Private) has been conducted once and it is not included in our regular syncs.

You can find an overview of the differing vetting and due diligence requirements for each type of U.S. organization in Appendix I.

To further identify causes, Benevity utilizes the National Taxonomy of Exempt Entities (NTEE) classification system for nonprofit organizations, which provides our clients with the option to filter causes based on the broad range of their activities including health, human services, arts and culture, education, research and advocacy, among others.

International Databases

Benevity's global database is populated by local government agencies and through our own research, which we obtain through our alliance with TechSoup Global and TechSoup's network of 70 foundation partners around the world. When populating the Benevity Causes Portal database, we regularly sync the additional international databases listed below:

- Australian Business Register
- Canada Revenue Agency List of Charities
- U.K. Charity Commission
- TechSoup Database of Causes

TechSoup conducts vetting, validation and due diligence on global causes for many of the leading foundations and corporate donors in the U.S., including The Rockefeller Foundation, the Bill & Melinda Gates Foundation, Microsoft, Google, SAP and others. For more information on TechSoup, please refer to Appendix II.

In addition to the regularly synced databases mentioned above, Benevity references the following international databases and will include listed organizations, in good standing, on an ad hoc basis:

- United States — NCES, National Center for Education Statistics (Government)
- Northern Ireland — The Charity Commission for Northern Ireland
- Guernsey — Association of Guernsey Charities
- Ireland — Charities Regulatory Authority
- Jersey — Association of Jersey Charities
- Scotland — OSCR — The Scottish Charity Regulator

Onboarding and Nominations

Benevity also adds causes manually to the available database upon the request of our clients and users. These manual updates have their own validation and vetting process to confirm the charitable status and eligibility of the nominated organizations.

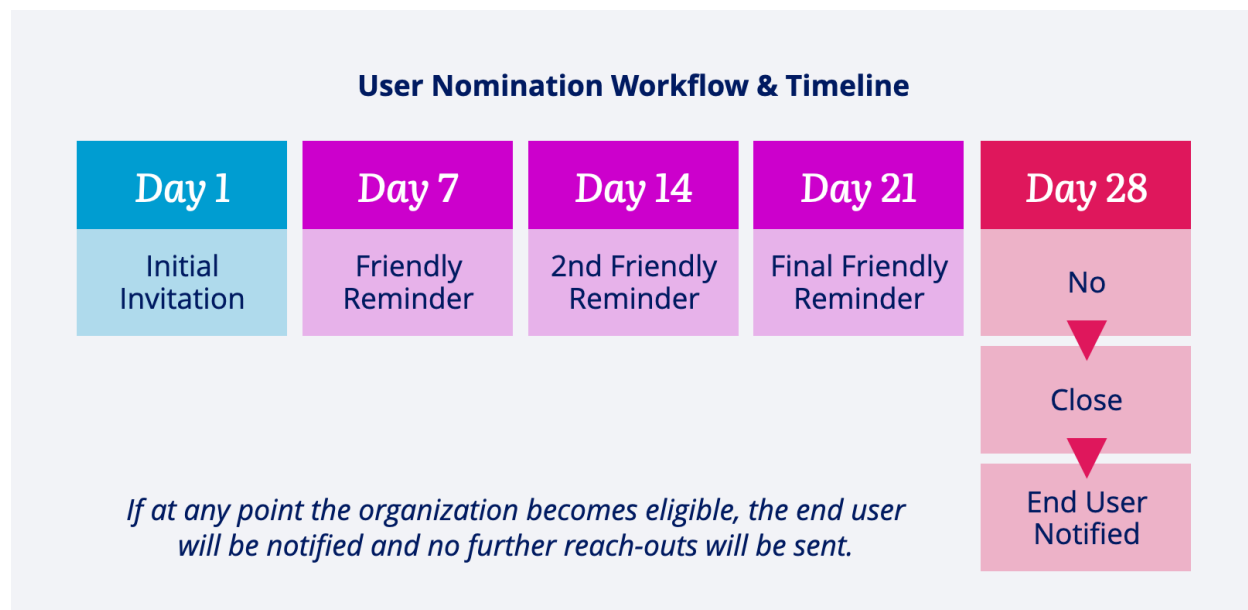
Coordinated Onboarding Communications

Benevity offers custom onboarding communications and follow-up schedules to assist our clients with having their preferred organizations available prior to program launch. A co-branded (Benevity/Client) onboarding invitation is sent to causes detailing the registration steps required to be eligible for our clients' programs.

User Nominations

In cases where causes are not included in one of the database syncs (e.g., an international or a religious organization that is automatically tax exempt has not claimed their 501(c)(3) status), they can be added to the database manually through onboarding invitations and/or user nominations in Spark. User nominations are requests that can be made by your users to have a cause or nonprofit added to the Benevity Causes Portal. We send all such nominations to our Vetting and Onboarding teams to determine the organization's eligibility. Once we receive confirmation of the cause's eligibility, our team gets started on creating a profile. Once a profile is created for the cause, the support team collaborates with an administrator representing the cause to complete their registration and profile on the Benevity Causes Portal. (See Account Registration and User Authentication below.)

If a cause meets our database import requirements, it will now be searchable in the Benevity Causes Portal (depending on clients' specific program eligibility requirements). Communications typically consist of up to four emails during a 28-day onboarding cycle.



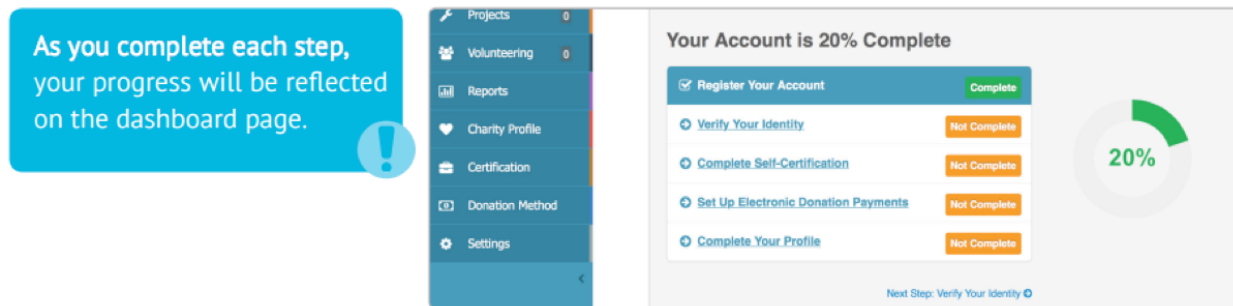
Cause nominations and onboarding communications are captured within our client service platform, Zendesk, which offers thorough tracking, reporting and tagging tools to manage all in-bound and out-bound support requirements. Throughout a cause's registration process, their progress is accessible on their personal dashboard. They can follow the steps online or reach out to the support team for assistance at any time.

Causes Portal Registration

Benevity uses a multi-step process to verify and validate the identities of individual cause representatives before enabling any deeper interaction with Benevity or our platform through the Benevity Causes Portal. Cause administrators must complete this process before they can edit or update any of the profile information in our database, and before any donation reporting or donor information is released.

Account Registration

The first step, registering or claiming an account, ties an authorized user to a cause profile in the Benevity Causes Portal. Users locate their cause profile and complete a registration that requires their email address, name, username creation and acceptance of Benevity's Terms of Use to initiate user authentication and account authorization.



User Authentication

Once a user has initiated their registration, their identity must be verified to allow them access to account editing features and the information and services provided to causes, including donor reports. An instantaneous review is completed in the backend against different risk factors. If the cause owner passes this review, they will automatically be verified. If they fail, the user will be prompted to supply verification documents based on the country where their organization is registered.

In the U.S., the cause administrator must submit:

- their IRS or equivalent letter of determination; and
- a letter of authorization from the organization or a void check/bank statement with the organization's name and address to authenticate the user.

These documents are reviewed by the Benevity Vetting team against established controls to prevent fraud.

Additional Validation

Once causes begin participating in the Benevity Causes Portal, they receive frequent prompts to complete additional processes that enable us to further classify and authenticate them.

Self-Certification

Benevity clients often require additional "non-legal" vetting to ensure compliance with program requirements (e.g., nondiscriminatory hiring, secular use of funds). We are able to filter out ineligible organizations from our database for each of our clients based on their individual requirements. We do this by enabling causes to self-certify against a standard set of common eligibility requirements.

The self-certification declaration is a click-through agreement that provides causes with an opportunity to agree to certain declaratory clauses that address issues like anti-discrimination, secular use of funds, political affiliation and deployment of funds, among others. The declarations of policy compliance then become

inclusion or exclusion tags or filters within our database. This enables us to enhance our causes database with organizations that comply with our clients' eligibility requirements without them having to duplicate the vetting effort (and costs). Completing the self-certification is an optional step for causes; however, we encourage all causes to complete it as doing so increases their chance of exposure to multiple client programs and donors.

Each completed declaration remains valid for a year and Benevity informs the cause when it is about to expire through a series of scheduled communications. If a declaration expires, the cause becomes ineligible for any programs it qualifies for through the self-certification document until it re-certifies.

Our client administrators and employees have encouraged the growth of self-certified cause profiles in our system, and that process continues daily for the benefit of all our partners. A copy of Benevity's Self-Certification Declaration has been attached in Appendix III for your reference.

Electronic Funds Transfer Sign-Up and Authentication

Once a cause has registered with Benevity and verified its identity, it is able to submit an online application to receive payments electronically. Electronic funds transfer (EFT), PayPal or ACH is required for all international disbursements and greatly encouraged for all causes in the database.

The provision of EFT/ACH information together with details on the disbursement history for each organization in our database provides us with valuable insight that will be useful in determining whether to allow a cause access to your grantmaking, volunteering and matching initiatives worldwide. The EFT application form is attached to their cause profile and requires that the cause upload a bank document (void check/bank statement) to authenticate against the organization information. This serves as another measure of identity verification as we gather additional contact information from the organization regarding its internal financial operations.

Once the application is submitted, members of our finance team verify that the information provided matches with that on the supporting document. Any discrepancies in account information or ownership will result in rejection of the EFT request. The cause representative is notified of the reason for the rejection and prompted to submit a new application form.

Cause Scanning: Sanctions, Recognized Global Watchlists, Adverse Media & Politically Exposed Persons

Benevity's database currently provides access to almost 2 million causes around the world, with each organization's good standing evaluated upon introduction to the database and when synced monthly with the relevant recognized global database. The Benevity Vetting team also conducts random audits to ensure that organizations are in compliance with eligibility standards.

Additionally, Benevity engages in reputational, anti-money laundering and anti-terrorist vetting verification against established watchlists and an in-house list that builds on the Southern Poverty Law Center's list of malicious organizations.

Watchlist Verification

Benevity verifies organizations against a variety of international and local watchlists. When a cause is flagged as appearing on a watchlist, our Governance and Controls team will further investigate the organization. If no donations have been made to the organization, it is immediately deactivated from the Causes Portal. Donations made to flagged organizations will be held pending further investigation. If the flag is found to be legitimate, action appropriate to the specific watchlist will be taken.

Benevity has partnered with Bureau van Dijk (BvD) to utilize their advanced screening solution. BvD offers ongoing monitoring, ensuring all causes within the Benevity Causes Portal will be screened against sanctions and recognized global watchlists on a daily basis, further reducing the risk for donation disbursement. Furthermore, BvD uses an AI approach that enables greater confidence in the matching and reduces the number of false positives. Their adverse media database is extensive and monitors from the earliest indication of risk — from accusation to conviction — giving you the information you need to make the right choices for your program.

As a result of our ongoing commitment to the integrity of our database, we do not limit vetting based on donation volumes. As the screening is done on a continuous basis, all causes receiving payment are run against the same watchlists the day prior to disbursement.

Adverse Media

BvD uses carefully selected media sources and finely tuned machine learning capabilities that apply unique risk scores to articles. They have global media coverage ranging from large, multinational publications down to those with small, regional circulations — covering 240 countries and more than 70 languages.

BvD has a number of adverse media codes and each represents a type of offense or offenses. Benevity takes a client-centric approach and has determined which codes to scan based on relevance, severity, likelihood and the possibility of reputational damage. In addition to scanning for money laundering and terrorism, we scan for human rights offenses, human trafficking, regulatory action, business crimes, fraud, weapons possession, murder, politically exposed persons, bribery, counterfeiting, cybercrime, denied entities, environmental crimes, foreign agents, organized crime, sex offenses, tax-related offenses and abuse. Each category is configurable using powerful filters such as risk code, stage and rating to home in on relevant risk.

If an alert is deemed a true match, it is added to our spreadsheet and made available to clients via an email from adversemedia@benevity.com. No causes are deactivated based on a true match; it is up to the client to request that those causes are removed from their program if they see fit.

Clients that have opted in for Benevity's adverse media scanning will get a weekly email detailing any causes that have been flagged through the scans. Clients can then inform their Client Success Manager if they require any donations to be removed from the disbursement cycle each month.

Politically Exposed Persons (PEP)

BvD's global database has over 1.6 million PEP records covering 240 countries and multinational organizations. The influence risk is clearly identified using four levels of political positions, full identification of current and past political history and the world's largest identification of friends, family and close associates. PEP master structures are constructed for each country containing all PEP-qualifying roles, titles and a number of people who fit within those roles. The PEP are then placed into one of BvD's 16 PEP categories based on the hierarchy

for personnel in each country. PEP is included in the adverse media scanning.

Cause Support Infrastructure

Benevity's cause support infrastructure is composed of two departments who provide prompt and skilled responses to our cause partners:

- **The Cause Operations** team maintains our global cause database, ensures the eligibility of our cause partners, and assists causes with registration and onboarding in the Benevity Causes Portal.
- **The Cause Support** team provides ongoing support to causes through email, phone and chat requests.

Causes can receive support by phone, email ticketing system or chat. Our support and attention to security and authentication continues throughout a cause's relationship with Benevity. In addition to this hands-on support, we offer causes a powerful self-serve Help Center, making it easy for them to find the answers they need when they need them, with article searching, FAQs and auto complete. They can also submit a support request and view their complete support history.

With this infrastructure and our general approach, we can assist in determining cause eligibility for any program.

Programmatic Discretion and Open Choice

An open-choice program is one where your employees can donate their money to the causes they care about without restrictions. This means that all 2 million vetted and validated causes are searchable and accessible in your program.

Open-choice programs are the most inclusive, they are proven to increase employee participation and, because you'll have full access to every validated cause in our database instantly, they'll allow you to respond quickly when disaster strikes.

However, you have the option to customize the list of eligible causes by applying specific program guidelines to search and match filters. Causes can be excluded/included using their employer identification number (EIN), the National Taxonomy of Exempt Entities (NTEE) classification system, keywords, regions or our self-certification declaration.

- Search filters — Prohibit a user from finding an organization within the solution and therefore taking any action toward it.
- Match filters — Restrict where client funds will go. Any causes excluded in this filter will be available for users to make transactions, give donations and sign up for volunteering, but no company matching dollars will be permissible.

Appendix I

US Databases

US-Specific Vetting Procedures and Requirements

Below is an overview of the differences in vetting and due diligence requirements for each type of U.S. organization. This table shows the breadth of items reviewed for each and the slight differences when it comes to U.S. schools and U.S. government entities.

Benevity US Org Vetting Procedures / Requirements

Application requirement	U.S. organizations	U.S. schools	U.S. churches	U.S. government entities
Government certificate/IRS letter of determination	✓	* ✓	* ✓	* ✓
Confirm Pub 78 verified - exclude private foundations	✓	✓	✓	✓
Verification of individual representative(s)	✓	✓	✓	✓
Certification agreement (standard)	✓	✓	✓	✓
Client-specific certification terms	✓	✓	✓	✓
Disbursement information	✓	✓	✓	✓
National Center for Education Statistics number (NCES)		✓		
Proof of status as a government entity				✓

*If a U.S. school, church or government entity has a 501(c)(3) letter of determination they will utilize the standard U.S. organization application flow.
If the school or church does not have 501(c)(3) status they will be asked for additional documentation.

Appendix II

International Databases

TechSoup Global

Benevity partners with TechSoup Global as our trusted experts in international vetting, validation and onboarding. Benevity offers access to more than 360,000 causes and nonprofit organizations outside of the U.S. and Canada at no additional cost. TechSoup's subsidiary NGOsource also performs equivalency determinations.

Our unique and exclusive partnership with TechSoup ensures that your people are contributing to a growing database of vetted international causes. TechSoup's global network complements Benevity's database so that we can bring on new causes — big and small — at no additional cost, saving you thousands of dollars for each cause included in your program.

Additional Validation — Optional Self-Certification Declaration

Why Participate?

This is Benevity's Self-Certification Declaration (the "Declaration"). The Declaration is a click-through agreement that provides Benevity's clients ("Benevity Clients") with information about your charity or not-for-profit organization ("Your Organization") that helps determine whether Your Organization is eligible under their corporate guidelines to receive donations ("Benevity Donations") through Benevity's online platform (the "Platform"). There are currently some 200 corporations representing more than 3 million employees that utilize the Platform for giving and grantmaking. Many, but not all, Benevity Clients require that charities and not-for-profits complete this Declaration in order to be eligible to receive Benevity Donations from these Benevity Clients.

Based on the answers to the questions set out below, Your Organization may be eligible for inclusion in the giving programs of a number of Benevity Clients without Your Organization having to agree to the specific eligibility criteria of each individual Benevity Client (or duplicate the effort in finding out!). While Benevity can't guarantee that Your Organization will receive Benevity Donations by completing this Declaration, if Your Organization does not complete the Declaration, there will be programs that Your Organization will be automatically excluded from (even if Your Organization would otherwise be eligible), as there are many large Benevity Clients that require completion of the Declaration as a condition of inclusion.

How to Participate

If Your Organization would like to be considered for Benevity Donations by those Benevity Clients that use the Declaration, please respond to each question or statement below. A renewal or a new Declaration has to be submitted each year in order to continue to be eligible under the Declaration (we will try to remind you when renewal is required but it is ultimately Your Organization's responsibility).

Tell Us About Your Charity or Not-For-Profit Organization

Please answer "Yes" or "No" to the following questions. Please note that answering "Yes" or "No" does not necessarily exclude you from Benevity Clients' giving programs.

1. Does Your Organization have all of the licenses and registrations that are required of it by all relevant regulatory authorities in its governing jurisdiction and is Your Organization in compliance with the laws and regulations applicable to it?
2. Does Your Organization Discriminate against any person or group of people in its hiring and employment practices, codes of conduct, programs, services or in any other aspect of its operations or activities on the basis of that person or group of people's personal characteristics or attributes?

For clarity, Discrimination in this Question includes (but is not limited to) hiring and employment policies or practices that Discriminate against a person or group of people on the basis of their sexual orientation or gender identity, even if such policies and practices are permitted under applicable law.

Note: "Discriminate" in Question 2 means the differential treatment of a person or group of people on the basis of a personal characteristic or attribute, including but not limited to, age, disability, ethnicity, gender, sexual orientation, gender identity characteristics or expression, marital status, national origin, political affiliation, veteran status, race, color, religion, religious observations, beliefs, practices, pregnancy or medical condition. Discrimination is usually (but not always) prohibited by law as anti-discrimination laws differ from jurisdiction to jurisdiction. If Your Organization has a hiring or employment policy, code of conduct or another operational component that excludes or treats a person or people differently on the basis of a personal characteristic or attribute such as sexual orientation or gender identity, Your Organization should answer "YES" to this Question whether or not it is prohibited by applicable law. A follow-up question will then be asked. For clarity, Discrimination does not include programs, practices or policies that require the differential treatment of a person or group in order for the organization to carry out its social mission

(sometimes known as a bona fide operational or occupational requirement). For example, an organization that provides assistance to people with mental or physical disabilities that does not offer the same services to those people who do not have mental or physical disabilities would not be engaging in Discrimination. Similarly, a women's shelter that excludes men from employment in certain positions in order to provide effective services to female victims of domestic violence would not be engaging in Discrimination.

If “YES,” then the below is exposed.

- a) Is Your Organization a religious or faith-based organization exempt from applicable laws that otherwise prohibit such Discrimination?
3. Will Your Organization apply Benevity Donations only to secular (non-religious) programs unless it has received written permission from Benevity or the relevant Benevity Client to apply specific Benevity Donations to non-secular (religious) programs (including programs for religious instruction)?
4. Does Your Organization support or sponsor political campaigns or otherwise advocate for (or against) political candidates?

You also agree that:

(Please answer “We agree” or “We disagree”)

5. Your Organization will not lobby a federal, state or local government agency or government official except where and only to the extent permitted under applicable laws.

Note: If “YES,” then the below is exposed.

- a) Your Organization does not allocate more than 25% of time devoted (volunteers and staff) and 25% of your budget toward lobbying efforts.
6. Your Organization will not use Benevity Donations to bribe any government or public official, unlawfully gain an advantage in political or legal proceedings or unlawfully solicit business.
7. Your Organization will not attempt to unlawfully or improperly influence a Benevity Client or any individual donor.
8. Your Organization will not identify any Benevity Client as a donor or use a Benevity Client’s logo or brand for promotional purposes without prior written consent of that Benevity Client.
9. Your Organization will return Benevity Donations that it knows or should know are ineligible under applicable law or Benevity Client guidelines or were provided in error. This obligation is in addition to (and does not supersede) Your Organization’s responsibilities set out in the Benevity Causes Portal Terms of Use.
10. As far as you are aware, Your Organization does not employ or engage any person or entity who appears or has appeared on any restricted party list, including without limitation, anti-terrorism, anti-money laundering, anti-bribery or other similar “watchlist” such as the U.S. Department of the Treasury’s Office of Foreign Assets Control (OFAC), Specially Designated Nationals List, the EU Consolidated List and the OSFI Consolidated List. Your Organization agrees to notify Benevity as soon as possible if it is no longer able to make this statement.
11. If a Benevity Client requests that a Benevity Donation be used for a particular charitable purpose or project that is among Your Organization’s existing programs or projects, Your Organization agrees to honor such request as best you can.
12. If Your Organization receives a Benevity Donation from a Benevity Client in the form of a restricted grant via a grants management product executed through the Platform (called, “Grants”), Your Organization agrees to follow any instructions from the Benevity Client that accompanies such

Grant. If Your Organization cannot follow those instructions, Your Organization agrees to return that Benevity Donation.

13. Your Organization will not re-grant Benevity Donations to organizations that are not able to provide the same responses as have been provided in this Declaration.

Contact Details

Please Provide the following:

- Name
- Phone
- Email Address (must be for the individual identified above)
- Name and Email Address for Alternative Contact
- Email Address for Your Organization

Almost Finished — Submit the Declaration

By submitting this Declaration, Your Organization agrees to submit a new Declaration as soon as possible upon learning that this Declaration is no longer correct. Your Organization also agrees that if Benevity learns that this Declaration is not correct, Benevity may remove Your Organization from the Platform and it will, on request, return all Benevity Donations as directed. For clarity, the rights and remedies set out in this Declaration are in addition to and do not replace those set out in the Benevity Causes Portal Terms of Use. You certify that the person completing this Declaration has authority to do so on behalf of Your Organization.