**Policy Number: BAC 001**

**Policy Title: Acceptance of Gifts**

**Purpose:** In order to protect both board members and the reputation of St. Paul of the Cross Passionist Retreat and Conference Center from accusations of bribery or corruption, board members are not permitted, directly or indirectly, to accept any gift, hospitality, reward, or other benefit from any source except under the following circumstances:

**Acceptance of Gifts** (Individual Board Members)

* Occasional gifts which are regarded as trivial and where the nominal value received by any one person is under $25; e.g., pens, calendars, diaries, etc.
* Occasional hospitality offers such as meals, product samples, event tickets, etc. where the nominal value received by any one person is under $100 and where the frequency would not be construed by an impartial observer as affecting the board member’s judgment regarding their duties as a board member.

If a board member receives an unsolicited gift exceeding the nominal value in the examples above, the board member should either return the gift to the sender, pay the sender full market value for the gift, or donate the gift to a charitable organization.

**Acceptance of Gifts** (The Board acting in the interest of St. Paul)

In addition to its fiduciary responsibilities listed on page 13 of the Board of Directors’ Policy Handbook (specifically item #4), the Board of Directors of St. Paul of the Cross Passionist Retreat and Conference Center are charged with the responsibility for establishing a policy for acquiring needed financial resources.

When considering whether to solicit or accept gifts, the organization will consider the following factors:

* Values - Whether the acceptance of the gift compromises any of the core values of St. Paul.
* Compatibility - Whether there is compatibility between the intent of the donor and the organization’s use of the gift.
* Public Relationships - Whether acceptance of the gift damages the reputation of St. Paul.
* Primary Benefit - Whether the primary benefit is to St. Paul versus the donor.
* Consistency - Is acceptance of the gift consistent with prior practice?
* Form of Gift - Is the gift offered in a form that St. Paul can use it without incurring substantial expense or difficulty?
* Effect on Future Giving - Will the gift encourage or discourage future gifts?

Accordingly, the Board of Directors of St. Paul of the Cross Passionist Retreat and Conference Center have adopted the following rules for accepting gifts and the Board of Directors reserves the right to change or modify the Gift Acceptance Policy on behalf of St. Paul at any time:

* The Board of Directors will abide by the wishes of the donor in restricting or designating a gift.
* Securities received by St. Paul will be sold immediately upon receipt. Gifts of securities will be acknowledged at the value received into the organization’s account on the day as received. Funds will be deposited into St. Paul’s operating cash account, unless designated or restricted by the donor or the Board.
* Gifts-in-kind will be valued by the donor for tax purposes. The gifts will be acknowledged by St. Paul with a formal letter without valuation.
* Non-cash gifts such as property, art work, vehicles, etc. will be accepted only if they can be converted to cash or of use in another manner by St. Paul.
* Gifts received through wills and bequests will be deposited into accounts designated by the Board of St. Paul. Funds will be used by the retreat center as needed or as directed by the donor.
* All gifts will be acknowledged within a reasonable amount of time, and signed by the appropriate representative of St. Paul.
* Donor information is maintained St. Paul and these records are confidential and will not be used by, or sold to any other organization.
* The Board of Directors guarantees that all solicitation activities conform to federal, state and local laws.

All decisions to solicit and/or accept potentially controversial gifts will be made by the Executive Committee of the Board in consultation with the Finance Committee and the Director of Mission and Ministry. If need be, the Executive Committee reserves the right to seek advice from legal counsel.