

June 8<sup>th</sup>, 2015

## **MENLO SPARK GIFT ACCEPTANCE POLICY**

Menlo Spark is a donor-supported non-profit project that operates as a division of the Trust for Conservation Innovation. We actively encourage individuals, corporations, foundations and other entities to support our work through donations and grant funding. Menlo Spark recognizes that actual or perceived conflicts could arise from accepting money from corporations or organizations with values, goals, and/or practices that conflict with our goals and work. Menlo Spark thus seeks to prevent any real or perceived conflicts of interest, and encourage compliance with the mission and values of Menlo Spark through the following gifts policy:

1. Menlo Spark will never deviate from its core values or strategic objectives in order to receive financial support.
2. Menlo Spark core values are reflected in its operating by-laws, and include bringing together businesses, residents and government to achieve a climate neutral community within ten years (by 2025), for a healthy and prosperous Menlo Park.
3. Menlo Spark will ensure that all donations will be subject to the following standards:
  - Acceptance of the contribution in no way implies approval by Menlo Spark of the donor's environmental record or policies, nor limits the right of Menlo Spark to advocate positions or take any actions allowed under current laws and regulations governing 501(c)3 tax-exempt organizations.
  - Acceptance of the contribution in no way implies approval by the donor of the actions, records or policies of Menlo Spark, nor limits the donor's right to advocate positions or take action of any nature.
4. Menlo Spark reserves the right to reject pledges or contributions if it concludes that:
  - They are given with any stated, implied or perceived intent to influence the positions or actions of Menlo Spark in a way that is inconsistent with our core values or strategic objectives.
  - They are given by a corporation, individual, or entity with a demonstrated disregard or disrespect for any of the core values of Menlo Spark.
  - There is good evidence to suggest that the gift is intended to help a corporation or entity falsely promote itself as environmentally friendly.
  - There is a significant risk that accepting the gift could undermine Menlo Spark's credibility with important allies and partners or the general public.
  - There is reason to suspect that the gift could result in private inurement or more than incidental private benefit. Inurement is often found when a private individual or for-profit company stands in an "insider" relationship with the nonprofit and has or is seeking the opportunity to make use of the organization for personal gain. Private benefit occurs when the assets of a nonprofit are used

June 8<sup>th</sup>, 2015

to serve a private interest instead of a public interest and applies to both insiders and independent outsiders.

5. If a member of the staff or Board wishes to raise questions about the solicitation or acceptance of a gift from a particular source under this policy, a committee consisting of the Board Chair, Board Vice-Chair, and Financial Advisor, is empowered to make final decisions about the application of this policy, following consultation with concerned parties.