

## **Wings Credit Union Foundation Philanthropy Guidelines**

### **I. STATUTORY ALLOWANCE**

As a private foundation governed by federal law, under 26 USC 4942(g)(1), Wings Credit Union Foundation ("Foundation") may distribute its funds in the following ways.

- **Grants & Contributions:** Money distributed to public charities (501(c)(3) organizations) to accomplish their charitable or educational.
- **Reasonable Administrative Expenses:** Necessary and appropriate costs paid to run the foundation and manage charitable activities.
- **Sponsorships:** Money distributed to public charities (501(c)(3) organizations) in support of their charitable and educational mission.
- **Scholarships:** In addition, because the Foundation applied for and received IRS approval to provide scholarships to individuals, the Foundation may award scholarships in the manner described and approved in the IRS ruling issued specifically to the Foundation.

### **II. DEFINITIONS**

A. **Contribution** – generally used this document, the term contribution includes all forms philanthropic gifts and donations including sponsorships

B. **Sponsorship** – used in this document, the term sponsorship refers to opportunities to contribute towards an event in return for significant public acknowledgement or other types of participation (multiplier effect) and should not be confused with marketing or business development sponsorships, which are decided at the business level

C. **Capital Campaign** – used in this document, the term capital campaign refers to a request to fund (or partially fund) a specific project for a non-profit organization; often these requests support a construction project requiring multiple years and significant dollars to complete

D. **We** – as used in this document, the terms 'we' and 'our' refers to Foundation as an organization as represented by its chief executive team

### **III. ETHICS STATEMENT**

We will not make a contribution if the intent is to improperly influence a government entity, secure a commercial advantage, or create a conflict of interest. All contributions are made in alignment with applicable laws, ethical standards, and our commitment to fairness, transparency, and community benefit.

### **IV. MISSION**

The Foundation's mission is to open doors, widen paths, and give every person the chance to build the financial life they imagine. We make the communities we serve more vibrant and believe it is part of our responsibility to make a lasting, positive impact through our work as a financial cooperative

and as a philanthropic partner. We foster mutually supportive relationships with, and strive to amplify the message of, the charitable organizations we support.

## V. DUE DILIGENCE

We strive to ensure contributions we make create maximum impact per contributed dollar based on verifiable outcomes. Our goal is to contribute to organizations whose work is sustainable and whose impacts are measured and published. To this end, we consider actual outcomes and use a research driven approach when determining to whom to contribute.

We strive to apply our evaluation criteria consistently and objectively across all applicants, without regard to protected characteristics, and in alignment with our commitment to equitable and responsible giving.

We reserve the right to deny for any reason any contribution request by any party or organization.

## VI. CONTRIBUTION PRIORITIES

Our focus areas are designed to support broad community impact and are applied in a manner that is inclusive and accessible to diverse populations and communities.

- Youth: Primary program impact focuses on children and young people, with an emphasis on early childhood development, mental and behavioral health, and access to essential needs such as stable housing and nutritious food.
- Education: Primary program impact supports financial education and lifelong learning at all levels, with a focus on programs that equip individuals, especially high school and college students, with the knowledge and tools to build strong financial futures. This includes support for scholarships at colleges and universities.
- Community: Primary program impact addresses major community issues with a focus on community enrichment, attainable Housing, food Insecurity, homelessness and/or poverty.
- Legacy: Primary program impact does not fit into any categories above but may continue to receive support based on our heritage.

Foundation will not make philanthropic contributions to:

- Organizations that engage in unlawful discrimination or exclusion based on protected characteristics, including but not limited to race, color, ethnicity, national origin, religion, age, disability, gender, gender identity, or sexual orientation
- Organizations whose primary purpose is religious worship or education; however, church or religious-affiliated programs that provide community services that do not discriminate or exclude may be considered.
- Labor unions
- Political organizations or candidates for public office
- Individuals (unless part of an approved program, sponsorship, or affiliated initiative)

- Sports teams or athletic programs (unless part of an approved program or partnership)
- Individual primary or secondary schools (unless part of an approved program or partnership)
- Organizations or programs that present material reputational, legal, or mission-alignment risk to the credit union, as determined through a consistent and documented review process
- Pass-through or intermediary organizations where funds are not directly tied to a defined program or measurable community impact

With the exception of agreed-upon multi-year commitments, Foundation will not typically establish a history of contribution to any single agency, organization, or activity in excess of three successive years.

Foundation has a long-standing legacy of being a community-focused, philanthropic organization. We believe it is imperative to continue our support of numerous non-profits in the communities we serve with whom we have a deep relationship. Thereby, in addition to the guidelines outlined in this document, our decision committee will continue to consider contribution requests based on this tradition, prior engagement, and relationships.

All funding decisions are made based on alignment with our mission, strategic priorities, and available resources, and are not influenced by any protected characteristic or personal affiliation.