



Donations Policy

Sealaska Board of Directors' Meeting

December 4-5, 2017

Tulalip, WA

Large Contributions to Sealaska Affiliates

- **Sealaska Heritage Institute:**

- Language, education and cultural programs
- SHI provides a budget and requested donation amount
- Donation approved annually by the Board of Directors at S&O Retreat
 - Guidelines for review presented for approval
- Sealaska separately considers donations to bi-annual Celebration

- **Spruce Root, Inc.:**

- Provides access to business development and financial resources in the form of loan capital, business coaching, workshops and competitions
- These programs support both new and existing businesses in Southeast Alaska and empower business owners through increased self-sufficiency
- Spruce Root management provides a budget and requested donation amount
- Donation approved annually by the Board of Directors at S&O Retreat
 - \$275,000 + \$25,000 in in-kind request for 2018, down from \$325,000 + in-kind in 2017 and >400,000 in 2016

Other Outside Donations

- **Small donations (<\$1,000)**
 - Tribal events, School Organizations, Community Christmas events, etc.
 - Approval by internal Contributions Committee
 - Corporate Secretary, Assistant Corporate Secretary, Communications Manager and Shareholder Relations Manager
 - Meetings called Ad Hoc to review and consider small contribution requests
- **Donations to regional and statewide partners (\$1,000 to \$5,000)**
 - Tribes, cultural entities, First Alaskans Institute, Alaska Native Heritage Center, Legal Defense organizations, Alaska Federation of Natives
 - Approval can be made at the Discretion of the CEO and Board Chair; unless there is need or desire for policy direction from the Board, in which case donation will be presented to the Board
 - Considerations: benefit to shareholders and local communities; recognition to Sealaska; meets mission or goals of the corporation (see “Considerations/Criteria” below)
- **Large Project or Community Donations (>\$5,000)**
 - Cultural Centers, Clan Houses, Totem Poles, Museums, Art Centers, Housing Projects, etc.
 - Backup materials and budget must be provided to the Board, including other sources of funding
 - Approval by the Board of Directors
 - Considerations: benefits to shareholders; benefits to local communities or tribes; recognition provided to Sealaska at an appropriate level; meets mission or goals of the corporation (see “Considerations/Criteria” below)

Required Documentation & Reporting

- Requests for contributions should contain the following information:
 1. Name, address, telephone number of organization, as well as supporting documentation regarding history, purpose, legitimacy of organization.
 2. Description of Purpose of Project.
 3. Identification of those who will benefit and how, including any benefit to Sealaska or its Shareholders.
 4. Total cost of project and amount requested from Sealaska, and other funding sources, if applicable.
 5. IRS identification number, including 501(c)(3) documentation, if applicable.
 6. Time frame involved for project or activity.
- Management Documentation for Board:

Management will prepare information on year-to-date donation amounts; donations made over the last 5 years to similar projects; donation amounts by community for consideration when the board is approving donations.

Considerations/Criteria

- Consideration will be given to requests/proposals that meet one or more of the following criteria:
 1. Requests from Alaska Native organizations or projects that are educational or advocate for Alaska Native people, specifically shareholders or descendants.
 2. Requests from national or statewide organizations where there will be a significant contribution or benefit within our region.
 3. Projects and programs that provide services and benefits to low-income individuals or families in our region and for the benefit of our shareholders or descendants.
 4. Projects and programs designed to enhance and preserve Alaska Native culture and heritage.
 5. Projects and programs that benefit communities where Sealaska has a business presence or large shareholder and descendant population.
 6. Projects and programs that encourage healthy recreation/activities for communities and students, particularly for shareholders and descendants.
 7. Other programs or projects that deserve support based on promotion of ANCSA and business purposes of Sealaska.
 8. Individuals will only be funded if the support of this individual will have a statewide or nationwide significance; preference is to fund through a sponsoring organization.
 9. No apparent or actual conflict of interest shall influence or appear to influence the actions or decisions taken by the Contributions Committee, Management, or the Board of Directors.
 - a. Board members will declare actual or potential conflicts with donations to entities they are connected to and will declare in the board room any potential conflict when actively considering donation requests; abstain from voting when necessary or appropriate.
 - b. Employees who manage the programs will also declare conflicts and recuse themselves from decision making on donations to entities where they may have a conflict of interest (code of ethics).