



UNITED PENTECOSTAL
FOUNDATION

DONOR ADVISED FUND PROGRAM

DONOR ADVISED FUND PROGRAM POLICY GUIDELINES: PROGRAM CIRCULAR

This Program Circular (“Circular”) describes the Donor Advised Fund Program of the United Pentecostal Foundation (“Foundation”), as well as important policies, procedures, and benefits associated with establishing and maintaining a donor advised fund account (“Donor Advised Fund”) at the Foundation.

All activities of the Foundation and participation in the Program are subject to the terms and conditions of this Circular, the Articles, Bylaws, and policies established by the Board of Directors of Foundation. The Foundation is governed by a Board of Directors (“Directors”), who are responsible for all aspects of its operations. The Directors reserve the right to modify the Donor Advised Fund Program and this Circular at any time.

TABLE OF CONTENTS: UNITED PENTECOSTAL FOUNDATION

<i>Establishing a Donor Advised Fund.....</i>	3
<i>Contributions.....</i>	3
<i>Tax Considerations.....</i>	5
<i>Investment Options.....</i>	6
<i>Grant-making.....</i>	6
<i>Recordkeeping and Reporting.....</i>	9
<i>Fees and Expenses.....</i>	9
<i>Succession Options.....</i>	10
<i>Foundation’s Unrestricted Permanent Endowment Fund.....</i>	11
<i>Service Provider(s).....</i>	11
<i>Conflict of Terms.....</i>	11

UNITED PENTECOSTAL FOUNDATION

Donor Advised Fund Program

Purpose

United Pentecostal Foundation, a 509(a) (3) public charity, was organized and operates exclusively for charitable purposes¹. The Donor Advised Fund Program provides donors the programs, tools, resources, and support to make charitable giving effective and simple.

Contributions to the Foundation are irrevocable and are immediately tax deductible² to the fullest extent allowed by law. Contributions to the Foundation to establish a Donor Advised Fund can be made at times that are most effective for you from a tax or financial planning perspective, while grant recommendations to nonprofit organizations may be made on a separate timetable to support the charitable mission of the United Pentecostal Church International—now, next year, or whenever you are ready³. Donor Advised Fund assets are invested and professionally managed, offering the potential for Donor Advised Fund contributions to grow and ultimately result in greater support for ministry.

Donor Advised Fund Program

As a donor to the Foundation for the Donor Advised Fund Program, you have the opportunity to:

- Make irrevocable charitable contributions to the Foundation for a Donor Advised Fund;
- Receive an immediate federal income tax deduction up to the maximum allowed by law;
- Recommend grants to organizations affiliated or associated with the United Pentecostal Church International³;
- Potentially increase charitable giving through professional investment management.

You may recommend that your Donor Advised Fund contribution be allocated to any combination of the offered investment pools, in keeping with different investment objectives. By pooling contributions, the Foundation enhances efficiency and reduces operating costs. Alternately, a custom-designed investment portfolio can be recommended.

¹ The United Pentecostal Foundation is classified by the Internal Revenue Service (“IRS”) as a tax-exempt supporting organization that is a public charity, as described in Sections 501(c)(3), 509(a)(3), and 170 of Internal Revenue Code of 1986 as amended.

² This Circular addresses only federal taxes. Rules and regulations regarding tax deductions for charitable giving vary at the state and local level. In addition, certain additional rules or limitations may apply with respect to your tax treatment depending on your specific circumstances. Please consult with your tax advisor.

³ Subject to certain guidelines. Please refer to the Minimum Account Activity.

ESTABLISHING A DONOR ADVISED FUND

Eligibility to establish a Fund

Individuals, companies, trusts, and estates are all eligible to establish a Donor Advised Fund. The individual or entity that establishes the Donor Advised Fund is considered the Donor and the Primary Fund Advisor. The Donor Advised Fund will reflect contributions, the Fund's share of investment returns, and its grant activity.

To establish a Fund

You may establish a Donor Advised Fund by completing a Donor Application and making an initial irrevocable contribution of \$5,000 or more. Once the Fund is established, you may make additional contributions at any time. The minimum amount for subsequent contributions is \$500.00.

To name a Fund

You may name up to three other persons in addition to the Primary Fund Advisor to be advisors on a Donor Advised Fund. Each Fund Advisor will have full and equal privileges to recommend grants, recommend changes to investment pool allocations, name and remove successors to the Fund, and name and remove additional advisors with the same privileges. All correspondence with the exception of confirmations related to contributions made by a Fund Advisor will be sent to the Primary Fund Advisor at the Primary Fund Advisor's address of record.

To modify donor/advisor information

Any current Advisor may add or modify any other contact information or revoke another advisor's Fund privileges at any time via the Fund Change form. Current Advisors being added or removed must provide written consent to their addition or removal.

To name a successor(s)

You will be asked to designate individual successor(s) to assume Fund privileges and/or qualified charitable organizations affiliated or associated with the United Pentecostal Church International to receive any remaining balance in the Donor Advised Fund after your death. If you do not name a successor(s) or recommend a qualified charitable organization, then upon your death, any remaining balance will be transferred to the Foundation's Unrestricted Endowment Fund. For more information, please see the Succession Options section herein.

CONTRIBUTIONS

Contributions are irrevocable

The Foundation must review and approve all contributions. Any contribution that is not accepted will be returned as soon as possible. Once the Foundation accepts a contribution, it is irrevocable and is owned and held by the Foundation. Contributions to the Donor Advised Fund Program are not refundable.

Types of contributions

The Donor Advised Fund Program accepts the following types of assets:

- *Cash contributions:* Cash contributions must be in U.S. dollars and delivered by check or wire. Checks should be made payable to the "United Pentecostal Foundation." Please also indicate the name and/or number of the Donor Advised Fund. The Foundation will not accept contributions of currency (foreign or U.S.) or certain cash-like monetary instruments, including postal money orders, money orders, or international money orders.
- *Publicly-traded securities:* Foundation accepts contributions of mutual fund shares, stocks, and bonds.

- *Other property:* Real estate and non-publicly traded assets (such as shares of a privately-held company) are made on a case-by-case basis. Contact a Foundation representative to discuss your contribution.

Minimum contributions

The minimum initial contribution is \$5,000. The minimum additional contribution is \$500.

Third-party contributions

Third parties—individuals other than the advisors of record on the Donor Advised Fund—may make contributions to the Foundation and are eligible for a tax deduction for their contributions to someone else’s Donor Advised Fund. All contributions must meet the criteria outlined above and be accompanied by a signed Additional Contribution form to ensure crediting to the appropriate Donor Advised Fund and proper confirmation to the third party for tax reporting purposes.

- Third-party contributors have no Fund privileges (including privileges to recommend investment allocation and/or grants) with respect to such contributions.
- Third-party contributors may not receive anything in exchange for or in consideration of their contribution, under IRS rules and Donor Advised Fund Program policies.

Confirmations of contributions

The Foundation will send a written acknowledgement of each contribution to the contributor as required by law.

The Primary Advisor will receive written notification of third-party contributions.

If the Foundation accepts a contribution of non-publicly traded assets, the Foundation will acknowledge receipt of the property, but will not provide a valuation of such property. If you are considering a contribution of non-publicly traded assets, you should consult your tax advisor to ensure compliance with IRS requirements, which may include obtaining a qualified independent appraisal. A Foundation representative will provide assistance to facilitate gifts of non-publicly traded assets.

Testamentary gifts and naming the Foundation as a beneficiary

Contributions to the Foundation can be an important part of your estate planning.

You may name the Foundation as a beneficiary of cash, securities, or other property under your will or other testamentary instrument, or as a beneficiary with respect to other non-probate property, including but not limited to⁴:

- An Individual Retirement Account (IRA);
- A 401(k) plan, 403(b) plan, or similar account;
- A charitable remainder trust;
- Certain charitable lead trusts;
- A life insurance policy;
- A brokerage account or other account allowing designation of beneficiaries.

Contributions may be made to the Foundation for allocation to an existing Donor Advised Fund or to a Donor Advised Fund created at the time of the bequest. Please contact a Foundation representative for suggested language for such contributions. Fund establishment requirements must be satisfied. Be sure to consult your tax and legal advisor when setting up any testamentary gift, trust, or other deferred gift. A Foundation representative can provide assistance in facilitating such gifts.

⁴ The Directors of the Foundation must review and approve all contributions. Any contribution that is not accepted will be returned as soon as possible.

TAX CONSIDERATIONS

Charitable deduction

You will be eligible for an itemized deduction on the date that you make your charitable contribution to the Foundation, subject to the general limitations described below. Your deduction will depend, in part, on the type of asset that you contribute. This Circular addresses only federal taxes. Rules and regulations regarding tax deductions for charitable giving vary at the state level. In addition, certain additional rules or limitations may apply with respect to your tax treatment depending on your specific circumstances. Please consult with your tax advisor. Deduction amounts follow:

- *Check/wire.* Your deduction is for the amount of your cash contribution.
- *Publicly-traded securities.* For publicly-traded securities held for more than one year, your deduction will be for the fair market value of the securities contributed. (For this purpose, the IRS determines fair market value to be the mean of the high and low prices reported on the date the contribution is made.) For mutual fund shares held for more than one year, your deduction will be for the fair market value of the shares contributed, determined as the closing price on the date the contribution is made. For securities or mutual fund shares held for one year or less, your deduction will be limited to the lesser of your cost basis or the fair market value.
- *Securities that are not publicly traded.* For contributions of securities that are not publicly traded and have been held for more than one year, your deduction will be the fair market value determined by you in a reasonable manner on the date the contribution is made. (As outlined above, if the Foundation accepts a contribution of securities that are not publicly traded, the Foundation will acknowledge receipt of the securities, but will not provide a valuation of such securities.) In certain circumstances, the IRS requires contributors to obtain a qualified independent appraisal. Please consult with your tax advisor.
- *Real estate.* For contributions of real estate, your deduction will be the fair market value determined by you in a reasonable manner on the date the contribution is made. (As outlined above, if the Foundation accepts a contribution of real estate, the Foundation will acknowledge receipt of the property, but will not provide a valuation of such property.) In certain circumstances, the IRS requires contributors to obtain a qualified independent appraisal. Please consult with your tax advisor.

Other considerations

Under the Internal Revenue Code, deductions for charitable contributions are subject to certain “percentage limitations” that limit the deductions that can be taken to a stated percentage of adjusted gross income (“AGI”) in the year the deduction is taken. (Contributions in excess of these percentage limitations may be carried forward up to five subsequent years.) Because the Foundation is a public charity, the percentage limitations that apply are generally the most favorable charitable deductions available under IRS regulations.

Deductions for contributions of long-term capital gain property (such as appreciated securities held for more than one year) are limited to 30% of AGI. Deductions for all other contributions (including contributions of cash) may be taken up to 50% of AGI. Your ability to take itemized deductions may be subject to certain other limitations. Please contact your tax advisor to determine your tax deductibility limits.

Estate planning

Contributions to the Foundation and any earnings related to your contribution are not part of your taxable estate and therefore are not subject to probate. In addition, you should note that you cannot exercise advisory privileges (such as naming advisors, recommending grants, or naming successors) through testamentary instruments. Advisory privileges with respect to the Donor Advised Fund will generally be determined by written successor designations on record with the Foundation. You should consult your legal or tax advisor regarding how the Donor Advised Fund can fit into your estate planning and how the tax rules will apply to your particular situation.

Tax treatment of income and of grants made to charitable organizations

Income that accrues to a Donor Advised Fund is income of the Foundation, not of the donor or any advisor. Therefore, the donor is not subject to tax on that income; neither is the donor eligible to take further charitable contribution deductions with respect to that income. Income or loss to the Foundation will be reflected in the value of each Fund.

When the Foundation makes grants to charities based upon your recommendation, the Foundation is granting its own assets. Accordingly, you will not be eligible for additional charitable deductions for these grants. (Your charitable contribution deduction was available at the time of the contribution to the Foundation.) If you receive a receipt from the grant recipient in connection with the grant recommendation, you may not use it for tax purposes.

INVESTMENT OPTIONS

Advisors may recommend how funds in a Donor Advised Fund should be allocated among a combination of the available investment alternatives. All investment recommendations are subject to review and approval by the Board of Directors of the Foundation. When no investment strategy is recommended, the contribution will be invested in a Money Market Pool. You may recommend how to allocate contributions and from which pools grants should be disbursed.

The Foundation offers donors a choice of two approaches to the investment management of contributions:

Asset allocation pools

These streamline your investment recommendations by offering a multi-asset class approach. Once you identify your giving goals, simply choose the model that best matches your personal giving plan. Each of the Asset Allocation pools is composed of allocations of the individual Foundation pools and is rebalanced periodically based on its investment objectives.

- or -

Individual investment strategies (Donor Advised Funds of \$100,000 or more)

These target a specific asset class and/or investment strategy. This offers a range of investment objectives from capital preservation to growth and allows the donor to recommend an investment strategy by allocating contributions to any combination of strategies. By policy, an individual Donor Advised Fund investment strategy is limited to Donor Advised Funds of at least \$100,000 or more.

GRANT-MAKING

Donor Advised Fund options

Your Donor Advised Fund can be established in one of four ways to best express how you wish to support charitable organizations.

Standard Donor Advised Fund

A Standard Donor Advised Fund allows both principal and earnings of your Donor Advised Fund to be distributed out from time-to-time by the Advisor(s) or Successor Advisor(s).

Endowment Donor Advised Fund

An Endowment Donor Advised Fund restricts grant-making to distributions of an annual payout rate or dollar amount that will be not less than 4% of the fair market value of the Donor Advised Fund as valued on June 30 of each year. The Foundation Board of Directors may increase or decrease the minimum payout to reflect current market conditions and investment performance.

Legacy Donor Advised Fund

The Primary and current named Advisor(s) can recommend distribution of both principal and earnings (Standard Donor Advised Fund), but Successor Advisor(s) will be limited to the annual maximum payout rate or maximum dollar amount distributions (Endowment Donor Advised Fund).

Flexible Donor Advised Fund

The Primary and current named Advisor(s) can only recommend grants in the amount of the maximum authorized payout rate or maximum dollar amount (Endowment Donor Advised Fund), but Successor Advisor(s) can recommend distributions of principal and earnings (Standard Donor Advised Fund).

Recommending a grant

Fund Advisor(s) have grant Foundation recommendation privileges. As defined herein, third-party contributors to the Foundation do not have grant recommendation privileges. Grants may be recommended to qualified charitable organizations affiliated or associated with the United Pentecostal Church International⁵. Recommendations may be made by email, by phone, or by submitting a completed current Grant Recommendation form. Grant recommendations are not binding and are subject to review and approval by the Board of Directors in their sole discretion. The Directors have adopted procedures and safeguards with respect to grant-making to ensure that funds are used exclusively in furtherance of charitable purposes.

If the grant recommendation is not approved, the Foundation will notify you in writing. You may decide whether to submit an alternative grant recommendation.

Ineligible grant recipients

Private Foundations: Private foundations are not eligible to receive grants from the Donor Advised Fund.

Transfers to other DAFs: The transfer of funds from DAFs held in the United Pentecostal Foundation are not eligible to be transferred to other DAFs not held in the United Pentecostal Foundation.

Non-U.S. charities: The Foundation does not make grants to non-U.S. charitable organizations (organizations not formed under the laws of the United States and its territories).

Grant guidelines

The Foundation only approves grants that are used exclusively in furtherance of charitable purposes. In accordance with that policy, the Foundation will not approve a grant that would confer an impermissible benefit on a donor, other person with grant recommendation privileges, or other third party (a "private benefit"). The Foundation also will not approve grants to be used for lobbying, for political contributions, or to support political campaign activities. The Foundation will reject grant recommendations for improper purposes and will take remedial action upon any discovery that improper grants have been made. Remedial actions may include but are not limited to requiring that the grant be returned or that the donor make an additional nondeductible contribution.

Private benefit and legally binding pledges

Grants may not be used to provide any impermissible private benefit, such as school tuition or scholarships sent directly to individuals, certain dues, membership fees, admission to charitable or other events, goods bought at charitable auctions, or any other noncharitable purpose. In

⁵ Qualified charitable organizations are those UPCI affiliated or associated organizations that would be those described in Section 170(b)(1)(A) of the Code, which include qualified religious, educational, hospital, medical research, governmental, and publicly supported charitable organizations ("public charities").

addition, grants may not be used for any legally binding pledge. (Under IRS rules, a pledge may constitute an obligation of a person, and the relief of that obligation by satisfying the pledge may be considered an impermissible private benefit.)

Anonymous grant-making

When recommending a grant, a donor may choose: (i) to be identified by name and address to the recipient charity, (ii) to be identified only by the name of the Donor Advised Fund (e.g., The Smith Family Fund), or (iii) to remain anonymous and not be identified, in which case the grant will be identified as recommended by a Foundation donor who wishes to remain anonymous. The Foundation will not release the donor name and contact information to any recipient charity without the donor's consent.

Allocating grants from the investment pools

If the grant recommendation is approved, the Foundation will liquidate the appropriate investments needed to fund the grant. The Foundation will then distribute the funds to the recommended organization. You may recommend from which investment pool(s) the grant should be made. If no recommendation is made, the Foundation will withdraw equal percentages from the Donor Advised Fund investment pools with funds to fulfill the grant.

Number of grants

The Foundation currently allows quarterly grants from a Donor Advised Funds of \$100,000 or more and annual grants from smaller Donor Advised Funds.

Minimum grant amounts

The Foundation will consider grant recommendations of \$1,000 or more (in increments of \$250) or for the balance of the Fund, whichever is less. If the amount of a grant recommendation exceeds the balance of the investment pool from which the donor recommended the grant be taken, the Foundation will withdraw equal percentages from the remaining investment pools with sufficient funds to fulfill the remaining amount of the grant. If the amount of a grant recommendation exceeds the total Donor Advised Fund balance, the Foundation will ask the donor to recommend a grant in a different amount or make an additional contribution.

Minimum grant activity

Our formal grant-making policy requires that minimum annual grants, on an overall basis, be greater than 5% of the average net assets of all Donor Advised Funds in the Foundation Donor Advised Fund Program on a fiscal 5-year rolling basis. If this requirement is not met in one year, the Foundation will ask for grant recommendations from donors who have not had grant activity of at least 5% of the Fund's average net assets over the same 5-year period. If these donors do not provide recommendations within 60 days, the Foundation will transfer the required amounts to organizations affiliated with the United Pentecostal Church International in the sole discretion of the Foundation Board.

Minimum Fund activity

If a Donor Advised Fund is dormant for 7 years (i.e., has not had any grant activity), the Foundation will make every effort to contact the Primary Advisor and require that the Primary Advisor recommend a grant from the Fund. If the Primary Advisor does not respond by making a grant from the Fund within a reasonable time, we will transfer the entire balance of the Donor Advised Fund to the Foundation's Unrestricted Permanent Endowment Fund.

Timing of grant distribution

The Foundation reviews grants routinely and, upon receipt of a donor's recommendation and the approval of the Board, makes the grant as soon as possible, generally within 10 business days. If your grant recommendation is to a UPCI affiliated or associated charity not previously reviewed and approved by the Foundation, it will require additional due diligence and will take longer to process. Investment values may fluctuate between the time of a donor's recommendation and the grant's actual distribution.

Grants and grant confirmations

Grants are made bearing the name of the Foundation and are accompanied by a letter from the Foundation recognizing the Donor Advised Fund name and the name and address of the donor, unless anonymity is requested. Grant checks and accompanying transmittal letters are mailed via the United States Postal Service to the legal address of the charitable organization. After each grant is processed, the Primary Advisor will receive a confirmation from the Foundation. If anonymity is not requested, you may also receive an acknowledgement directly from the recipient charity. Donors are not, however, eligible for additional charitable deductions for these grants, since the donor's charitable deduction was received at the time of the contribution to the Foundation.

RECORDKEEPING AND REPORTING

Confirmations of Fund activity

The Foundation will provide you with confirmations of all Donor Advised Fund transactions, generally within 5 business days of processing. During peak contribution and grant distribution periods (generally December, January, and June), it may require up to 10 business days to process and mail Donor Advised Fund activity confirmations. Contribution confirmations serve as donors' receipts. Because the IRS requires confirmation of charitable contributions greater than \$250, these confirmations should be kept with your tax records. Contribution confirmations will also show the fair market value of contributions of publicly traded securities. Any fair market value computation on a confirmation is a good faith estimate on the part of the Foundation. Before claiming any tax deduction, you should consult with your tax advisor.

Tax forms

For donors who contribute at least \$500 in publicly-traded securities, the Foundation will provide an IRS Form 8283 showing an estimate of the fair market value of the contribution(s). The IRS requires taxpayers to complete and file a Form 8283 with their federal income tax return for gifts of property (including publicly-traded securities and other securities) valued at \$500 or more.

Financial reports

The Foundation will provide you with any other financial reports or information required by law, as well as quarterly statements and an annual report.

FEES AND EXPENSES

General operating expenses

Each Donor Advised Fund is assessed a minimum annual administrative fee of 1% of Fund assets or \$500, whichever is greater.

The administrative fee of 1% is charged on a quarterly basis. Funds for which the 1% administrative fee is less than \$500 for a given fiscal year will be charged the difference between \$500 and that 1% fee. Such charges take place at the end of the fiscal year.

Donor Advised Funds with assets in excess of \$500,000 are eligible for a reduced fee based on the tiered pricing schedule featured below and receive an annual credit for the difference between that fee and the 1% administrative fee initially charged. Credits are allocated to eligible funds at the end of each fiscal year.

Annual Administrative Fees—Tier Price Credit Schedule

AVERAGE FUND BALANCE	FEE (BASIS POINTS)	ANNUAL FEE
First \$500,000	at 100 basis points	equals \$5,000
Next \$500,000	at 75 basis points	equals \$3,750
Next \$1,500,000	at 50 basis points	equals \$7,500
Next \$2,500,000	at 25 basis points	equals \$6,250
Amounts over \$5,000,000	as negotiated	

Working with an advisor

The Foundation works with certain advisors (such as CPAs, attorneys, and registered investment advisors) to help them aid their clients in achieving their philanthropic goals. If an advisor introduced you to the Foundation, or has advised you in connection with your contributions to the Foundation, the Donor Advised Fund may pay part of the administrative fee to the advisor, based on your advisor firm's overall relationship with the Foundation.

Donor Advised Funds established through certain other entities (such as corporations and associations) that assist the Foundation in its fundraising may also be eligible for a part of the administrative fee to be shared with the corporation or association based on the entity's overall relationship with the Foundation.

Trading and liquidation fees

Commissions and other fees incurred by the Foundation in connection with contributed property will reduce the net proceeds credited to each Donor Advised Fund.

Investment expenses

Each investment pool invests in mutual funds and other investments that are subject to varying operating and management expenses. These expenses affect the daily net asset values of the mutual funds within the pools and each investment. Operating and management expenses of these mutual funds are subject to variations. The Foundation normally does not pay a sales load on purchases of mutual fund shares because these purchases either qualify for a load waiver, or the applicable mutual fund does not charge a sales load.

For more details on mutual fund and other investment fees and expenses, please refer to each individual investment or mutual fund's prospectus or disclosure document. To inquire about current mutual fund expenses or fund composition for the investment pools, please call a Foundation representative.

SUCCESSION OPTIONS

Naming a successor

When you establish a Donor Advised Fund, you will be asked to recommend a successor(s) to assume all privileges (such as overseeing contributions and making grant recommendations) upon your death. We recommend reviewing successor information once a year to ensure that it remains consistent with your wishes and to verify that contact information is still current. The successor(s) elected to the Donor Advised Fund can be changed at any time.

Upon the death of the Primary Fund Advisor, the next named Fund Advisor shall serve as Primary Fund Advisor. Upon the death of the last remaining Fund Advisor, the Donor Advised Fund shall be distributed to the named successor charitable beneficiaries, and/or if Successor Advisors have been named, a separate Donor Advised Fund will be established for each individually named Successor Advisor.

The new Funds will be funded equally from the remaining Fund balance at death unless otherwise specified by the donor. If the successor(s) is a minor, we may require that grant recommendations be made by a legal guardian. Upon assuming Fund privileges for the Donor Advised Fund, the successor(s) may designate his or her own successors. Successor Funds must be funded with a minimum of \$25,000. Successors with an allocated balance of less than \$25,000 will have the option to make additional contributions to reach the \$25,000 minimum within 12 months from the date of notification. Alternatively, successors may recommend grants equal to the allocated balance within 90 days. If a successor fails to respond to the notification within 90 days, the Directors will transfer the balance to the Foundation's Unrestricted Endowment Fund.

Once the Foundation is notified of the death of the last Fund Advisor, your recommended charitable organization(s) would receive the percentage of the Fund designated, provided that the named organization(s) continues to be an eligible grant recipient. If, at the time of your death, the organization is no longer an eligible grant recipient, the portion of the Fund designated for that beneficiary will be distributed equally among any other qualified successors, or, if no other successor is named, will be distributed to the Foundation's Unrestricted Permanent Endowment Fund.

If no Successor Advisor is named or charitable beneficiary is recommended

If you do not name a Successor Advisor or recommend a charitable organization as your beneficiary, upon notification of your death, the Foundation will transfer your Donor Advised Fund to the Foundation's Unrestricted Permanent Endowment Fund.

Please note: You must designate successors or charitable beneficiaries directly with the Foundation during your lifetime. You may not do so through any testamentary instrument, including through your will or instructions to your executor, and you may not name your estate as a successor.

FOUNDATION'S UNRESTRICTED PERMANENT ENDOWMENT FUND

The Foundation administers their own Permanent Unrestricted Endowment Fund with an annual payout rate of not less than 5% being made to The United Pentecostal Foundation to cover operating costs of the Foundation and to provide stewardship-related services to the constituents of the United Pentecostal Church International

SERVICE PROVIDER(S)

The Directors will contract with various companies to provide various administrative services to the Foundation to service the United Pentecostal Foundation Donor Advised Fund Program. The sum total of all fees, expenses, and cost reimbursements cannot exceed an annualized rate of 1% of the Donor Advised Fund's assets. This 1% limitation is subject to further reductions for Fund assets above certain sizes as described under "Fees and Expenses."

CONFLICT OF TERMS

In the event of an inconsistency between the terms of this Circular and the Articles and Bylaws of the Foundation, then the Articles and Bylaws of the Foundation will govern the rights and obligations of the Donor Advised Fund and donors. In the event of any conflict between the terms of this Circular and the IRS rules or regulations concerning donor advised funds, then IRS rules or regulations will govern the rights and obligations of the Donor Advised Fund Program or its donor(s) and advisor(s).