



## ServeGlobe Incorporated

### Policy on acting as a non-conduit entity for donations

**1. Purpose** This policy outlines ServeGlobe Incorporated's approach to ensuring compliance with the requirements of the Australian Taxation Office (ATO) for maintaining registration as a Deductible Gift Recipient (DGR). The policy ensures that ServeGlobe Incorporated does not act as a mere conduit for the donation of money or property to other organisations, bodies, or persons, in line with the Australian Charities and Not-for-profits Commission (ACNC) regulations and the ATO guidelines.

**2. Scope** This policy applies to all ServeGlobe Incorporated activities involving the solicitation, receipt, management, and distribution of donations. It governs the actions of the ServeGlobe management committee, employees, volunteers, and representatives involved in donation-related activities.

### 3. Definitions

- **Conduit:** An organisation that merely passes on donations to other entities or individuals without exercising proper control and discretion over the funds.
- **DGR:** Deductible Gift Recipient, an organisation endorsed by the ATO to receive tax-deductible donations.
- **ServeGlobe activities:** Charitable programs, services, or initiatives delivered directly by ServeGlobe Incorporated in line with its charitable purpose.

**4. Policy statement** ServeGlobe Incorporated is committed to:

1. Acting as an independent charity that exercises full discretion and control over all donations received.
2. Ensuring that all funds are applied solely towards ServeGlobe's charitable purpose.
3. Maintaining compliance with DGR and ACNC requirements by ensuring that ServeGlobe is not acting as a mere conduit for other entities.

**5. Key Principles** ServeGlobe Incorporated operates according to the following principles to ensure compliance:

**5.1 Discretion and Control** ServeGlobe exercises full control over the allocation of donated funds. Funds are not earmarked for specific external organisations, bodies, or individuals unless:

- The allocation aligns with ServeGlobe’s charitable purpose; and
- ServeGlobe retains discretion over the use and application of the funds.

**5.2 Charitable Purpose** All donations are applied directly towards ServeGlobe’s stated charitable purposes, including:

- Undertaking exercises to protect and enhance the natural environment, with a primary focus on reducing, and mitigating the effects of plastic pollution in Australian water bodies; and/or
- Undertaking projects directly managed or supervised by ServeGlobe to protect and enhance the natural environment, with a primary focus on reducing, and mitigating the effects of plastic pollution in Australian water bodies.

**5.3 Prohibition on pass-through arrangements** ServeGlobe does not:

- Accept donations on behalf of other entities;
- Forward funds to other organisations, bodies, or persons without delivering ServeGlobe’s own charitable activities; or
- Act as an intermediary for private individuals or entities seeking tax benefits without fulfilling ServeGlobe’s charitable purpose.

**5.4 Transparent agreements** When working with other organisations to deliver charitable projects, ServeGlobe:

- Establishes formal agreements that clearly outline the project’s scope, ServeGlobe’s role, and the use of funds;
- Ensures ServeGlobe maintains ultimate responsibility for the project’s delivery and outcomes.

## **6. Responsibilities**

**6.1 Management Committee:** ServeGlobe’s management committee ensures compliance with this policy and oversees the management of funds to uphold ServeGlobe’s charitable purpose.

**6.2 Staff and Volunteers** All personnel involved in donation management are responsible for implementing this policy and ensuring funds are not used inappropriately.

**6.3 Financial controls** ServeGlobe employs rigorous financial controls to:

- Track and document the receipt and use of donations;
- Ensure funds are allocated to ServeGlobe's charitable activities in line with this policy.

**7. Record keeping** ServeGlobe maintains detailed records of:

1. Donation sources and amounts;
2. The allocation and expenditure of funds; and
3. Agreements and correspondence with any third parties involved in projects or collaborations.

**8. Monitoring and Compliance** ServeGlobe regularly reviews its operations and financial management practices to:

1. Ensure compliance with ACNC and ATO requirements;
2. Address any risks of non-compliance with DGR conditions.

**9. Breaches** Any breach of this policy will be taken seriously. ServeGlobe may:

1. Conduct an internal investigation;
2. Take corrective actions to address non-compliance; and
3. Report material breaches to the ACNC or ATO, as required.

**10. Policy Review** This policy will be reviewed annually by the ServeGlobe Board to ensure continued compliance with ATO and ACNC regulations and to address any changes in the regulatory environment.

## **11. References**

- Australian Charities and Not-for-profits Commission Act 2012 (Cth)
- Income Tax Assessment Act 1997 (Cth)
- ATO Guidance on DGR endorsement requirements

**12. Approval** This policy was approved by the ServeGlobe Incorporated management committee on Thursday, 2nd. Day of January, 2025 and is now in-force.