This policy covers MakeWay Foundation and MakeWay Charitable Society, collectively called MakeWay.

**Fraudulent or Dishonest Conduct**

1. MakeWay’s fundraising affairs will be conducted in a responsible manner, consistent with the ethical obligations of stewardship and all applicable laws.

2. MakeWay will not make claims that cannot be upheld, or are misleading, dishonest or incorrect.

3. Fundraising solicitations on behalf of MakeWay will be truthful and accurately describe MakeWay’s activities and the intended use of donated funds.

4. MakeWay will not exploit its beneficiaries. It is sensitive in describing those it serves and it will fairly represent their needs and how these needs will be addressed.

5. Solicitations by or on behalf of MakeWay will treat donors and prospective donors with respect. Every effort will be made to honour their requests to:
   - Limit the frequency of solicitations;
   - Not be solicited by telephone or other technology;
   - Receive printed material concerning MakeWay;
   - Discontinue solicitations where it is indicated they are unwanted or a nuisance.

6. MakeWay's online solicitation practices will be compliant with consumer protection legislation such as the Canadian Code of Practice for Consumer Protection in Electronic Commerce.

7. MakeWay's face-to-face solicitation practices will be compliant with the confidentiality and transparency provisions of this policy.

8. Volunteers, employees, advisors and third-party consultants/solicitors who solicit or receive funds on behalf of MakeWay will:
   - Adhere to the provisions of this policy, the MakeWay Privacy Policy, and all other relevant MakeWay policies;
   - Act with fairness, integrity, and in accordance with all applicable laws;
   - Adhere to the provisions of applicable professional codes of ethics and standards of practice;
   - Cease solicitation of a prospective donor who identifies the solicitation as harassment or undue pressure, or who states that he or she does not wish to be solicited;
   - Disclose immediately to MakeWay any actual or apparent conflict of interest or loyalty;
   - Not accept donations for purposes that are inconsistent with MakeWay’s mission.
Confidentiality

1. MakeWay honours donor requests to remain anonymous, except as otherwise required by law or regulation, with respect to:
   - Being publicly identified as a supporter of MakeWay;
   - Having the amount of their contribution publicly disclosed.

2. MakeWay respects and protects the privacy of donors. Any donor records, including credit card information, maintained by MakeWay are kept confidential in accordance to current laws and regulations. Donors have the right to see their own donor record, and to challenge its accuracy.

3. MakeWay does not sell, exchange, rent, or otherwise share its fundraising lists with other organizations.

Transparency

1. MakeWay and representatives who fundraise on its behalf will disclose whether an individual or entity soliciting contributions is a volunteer, an employee, or a contracted third party.

2. All fundraising solicitations by or on behalf of MakeWay will disclose MakeWay’s name and the purpose for which funds are requested. Printed and on-line solicitations will also include MakeWay’s address or other contact information.

Receipting and Recognition

1. MakeWay will prepare and issue official income tax receipts for monetary gifts and for gifts-in-kind of $25 or more that are in compliance with all regulatory requirements. Charitable gifts made online, and that are in compliance with all regulatory requirements, will receive an official income tax receipt regardless of value.

2. MakeWay will acknowledge in writing contributions of $25 or more that are not entitled to be officially receipted.

3. MakeWay may name tangible and non-tangible assets in recognition of significant contributions to MakeWay. The naming of an asset:
   - Will be consistent with MakeWay’s mission and objectives;
   - Will be for a defined and limited period of time;
   - Will be made on joint written approval of the donor and MakeWay’s Vice President of Client Services;
   - May be terminated or altered if continuation of the recognition creates a reputational risk for MakeWay.
4. Recognition mechanisms created due to a gift will not be arbitrarily changed or withdrawn by MakeWay unless otherwise negotiated at the time of the gift or changed through a joint agreement between MakeWay and the donor or an appointed representative of the donor.

Fundraising Standards

1. MakeWay does not compensate employees or contractors based on the amount of revenue fundraised. This standard does not apply to: commercial fees, such as commissions or percentage payments or similar administrative payments for credit card transactions; administrative fees charged by registered charities that collect money on behalf of other charities; cause-related marketing where a retailer or other service provider agrees to give a percentage of sales to a charity without any intermediary; service providers that provide a platform for fundraising but do not solicit contributions on behalf of MakeWay; or lotteries and social gaming events that are otherwise regulated.

2. Fundraising lotteries and other gaming events will be licensed by the appropriate regulatory body.

3. In any cause-related marketing collaboration with a third party, MakeWay will disclose in all related materials how MakeWay benefits from the sale of products or services and the minimum or maximum amounts payable under the arrangement. If no minimum amount is payable, this will be disclosed.