

This document provides information on how Give2Asia manages grant and project activities, from early scoping to final project reporting. It also outlines important requirements that Give2Asia and its donors must follow for compliant grantmaking into China.

All charitable activities in China that are funded by overseas nonprofits such as Give2Asia are governed by China's Overseas NGO Law, which was enacted in 2017. This law views Give2Asia as the owner of our grant activities and requires that Give2Asia carry the sole and entire responsibility for the success of a project funded with a grant made to a China-based charity.

Our Staff Capabilities & Compliance Partners In China

Since June 2017, Give2Asia maintains a China Representative Office entity under China's Overseas NGO Law. Give2Asia's registration is quite broad, enabling us to make grants for a wide range of issues across the whole country. Give2Asia has appointed a Chief China Representative Ms. Carol Yang and maintains an office in Beijing with 8 total staff as of January 2021. Give2Asia's team in China has the ability to:

- Develop a working relationship with grant recipients locally
- Work and develop content in both Chinese and English
- Keep all parties updated on the most recent project activities and compliance steps
- Address project-related issues that arise in China to help ensure the best possible outcome

All grantmaking into China by Give2Asia must first be approved by Give2Asia's compliance partners, starting with its Professional Supervisory Unit (PSU). Give2Asia's PSU is the Chinese People's Association for Friendship with Foreign Countries, which is affiliated with the Ministry of Foreign Affairs. Final approval authority rests with the Beijing Public Security Bureau Overseas NGO Administrative Office (PSB). Give2Asia's PSU and PSB are legally entitled to monitor all the grants made and activities carried out by Give2Asia in China.

Give2Asia's Board of Directors reserves the final decision on whether a grant should be approved from the United States and serves as the legal custodian of all funds received by Give2Asia.



Windows For New Grant Approvals

Give2Asia's China Representative Office typically has four opportunities each year to submit activity plans for the Chinese government's consideration. Give2Asia cannot guarantee approval of any grants.

Typical Deadlines for Give2Asia to Confirm New Grants from Donors	Give2Asia Submission Deadline to Submit to PSU	Estimated Time for PSU & PSB Approvals (varies)
December 15	1st window: December 31	3 months, due to large volume
March 15	2nd window: March 31	2 months
May 15	3rd window: May 31	2 months
August 15	4th window: August 31	1.5 months, due to relatively smaller number of proposals

Donor Documents Required by Give2Asia

1 Give2Asia Concept Note: Give2Asia collects concept note information from the donor and the grantee once you, the donor, have confirmed that a project will be funded. A form for this information can be provided by Give2Asia to both the donor and grantee. Information from the concept note will be used in Give2Asia's formal annual activity plan, which is submitted to its PSU and PSB. The following information needs to be provided:

- Donor information: Only the donor name is required.
- Grantee information: Name, location and contact information (point of contact and phone/email) are required. This is essential for Give2Asia's HQ and China teams to establish a direct line of communication with the grantee and understand the intended grant activity. This information may also be requested by the Chinese approval authorities. Also, please note that grants to individuals or for-profit businesses are not permitted.
- Project information: Brief project description, target issues, planned activities, expected outcomes, project location, grant period, sub-grantees or project partners, grant amount, and disbursement arrangements for each grant.
- Give2Asia activities: This includes all activity, including grantmaking, advisory services, events, and research. For research projects, research project scope and how the results will be utilized.

Since the annual activity plans must be specific, donors should obtain all necessary internal approvals for their organization prior to submitting grants with Give2Asia. It is also preferable that the Concept Note information is submitted in both English and Chinese.

2

China Commitment Form: The Chinese government needs confirmation from Give2Asia that funds will be made available for a project following their approval process. Give2Asia's China Commitment Form captures this commitment from you, the donor, and provides more donor information for Give2Asia, such as a description of your philanthropic goals, primary contact, and special requests. It also captures details on expected Give2Asia pricing for grant, project management, due diligence, and any other services related to the project.

3

Advised Grantmaking Agreement: This is a one-time document signed at the beginning of a relationship between Give2Asia and a donor. Once signed, Give2Asia can establish a fund to hold and account for your donations as they wait to be granted, and also can take guidance from you over email without requiring additional signed documentation for each grant request. For new donors beginning with a grant to China, Give2Asia typically requests the signing of an AGA either once due diligence activity is set to begin or once final grant approval is received from the PSU and PSB has been received.

Adjustments

Once a grant has been formally approved by the Chinese government, any adjustment requests from donors **must** be submitted in writing to Give2Asia. All adjustments will be reviewed by Give2Asia prior to submission to the PSU and PSB for their consideration.

- Adjustments may be considered if they include: Grant amount changes, grant period changes, shifts in budget allocations, and modifications to select project activities.
- Adjustments may not be considered if they include changes to project goals and project partners.

Due Diligence

Once the PSU and PSB approve an activity plan, a due diligence check is carried out. Should a grant not pass a due diligence check, Give2Asia will inform you so you can decide how to proceed with future grantmaking.

Give2Asia's grant and project management procedures include:

- Conducting a due diligence review of the grantee organization
- Reviewing and conducting Give2Asia board approval of project proposals
- Entering into a legally binding contract with the grantee for the project
- Disbursing grant funds to grantee in China
- Monitoring project implementation regularly via virtual and in-person meetings
- Ensuring that projects stay on track both in terms of the government approved timeline and work scope
- Gathering reporting from the grantee that complies with both U.S. and Chinese government requirements, in addition to donor reporting requirements

Publicity

To be compliant with Chinese law and regulations, Give2Asia must be referred to as the grantor in all publicity activities or materials within China. No regulations apply for materials produced and disseminated outside of China.

Grant Description

- For donors, Give2Asia suggests the following language: “This project is sponsored by [DONOR] and is granted and managed by Give2Asia.” In Chinese, this should be “这项活动由Give2Asia管理” .
- For corporate donors, either the company name or the corporate foundation name can be used, depending on the source of the funds. Corporate logos also may be used.

Public Relations & Press Releases

- For public events in China for which Give2Asia's input, feedback, or attendance is needed or requested, please give Give2Asia at least two weeks' notice.
- For press releases in China, please make sure Give2Asia is included in the review process for clear, compliant, and effective communications.
- If needed, Give2Asia may seek guidance from the related administrative agencies to ensure that all activities comply.

Fee Structure

Give2Asia will be an active participant in every stage of the grant and project. Due to the project and administrative management that China's Overseas NGO Law requires, Give2Asia has a modified pricing structure for grantmaking into China. As of Jan 1, 2020, this pricing structure is as follows:

Grant Size	Service Pricing
Up to US\$25,000	US\$3,000
US\$25,001 to US\$100,000	13%
US\$100,001 to US\$500,000	11%
Over US\$500,000	9%

Separate fees for our due diligence checks remain at US\$1,500 for an initial review. There is no set up fee or minimum activity requirements. There are no other hidden fees for grantmaking to mainland China.

Grantmaking Process

In compliance with China's ONGO law

