



Legal Review Policy

Purpose

To establish requirements for legal review of grant agreements, tax-related matters, and significant contracts to protect the organization's interests and tax-exempt status.

Scope

This policy applies to all branches (stanychi), camps, and fraternal groups (kurini) operating under the organization.

Policy Requirements

A. Grant Agreements

1. All grant documentation must be forwarded to the National Board of Directors (KPS) immediately upon receipt to the following email addresses: Holova@plastusa.org, GeneralCounsel@plastusa.org, and KPS-financy@plastusa.org.
2. All grant agreement require review and approval from KPS before execution. KPS will evaluate each agreement within 14 business days of receipt, during which time it may approve the agreement, request modifications, or provide feedback. In cases where revisions are needed, KPS will collaborate with both the grantor and grantee to refine subsequent drafts until final approval is achieved.
3. To request accelerated review of a grant agreement, the grantee must clearly indicate "EXPEDITED REVIEW REQUIRED" in the email subject line when submitting to KPS. The request must include a specific deadline for review completion and a brief explanation of the circumstances necessitating expedited processing. KPS will make every reasonable effort to accommodate time-sensitive requests while maintaining thorough review standards. Grantees should submit expedited requests as early as possible to ensure adequate processing time.

NOTE: Standard review timelines may be impacted based on the complexity of the agreement and current review volume. While KPS strives to meet all expedited deadlines, submission of an expedited review request does not guarantee accelerated processing.

4. No grant agreement may be signed by grantee without written approval from KPS.

B. Tax Status Matters

1. KPS must be notified immediately of:
 - a. Any inquiry from tax assessors regarding tax-exempt status;



- b. Any notification suggesting potential issues with tax-exempt status;
 - c. Any request for information related to tax-exempt status.
2. All of the above tax-related communications must be forwarded to KPS within 24 hours of receipt to Holova@plastusa.org, GeneralCounsel@plastusa.org and KPS-finance@plastusa.org.

C. Contract Review Requirements

1. Legal review by KPS and general counsel is mandatory for any contract that meets one or more of the following criteria:
 - a. Financial Thresholds:
 - i. Single contracts with expenditures of \$15,000 or more
 - ii. Multiple contracts with the same vendor totaling \$15,000 or more within a two-year period
 - iii. Subsequent contracts with a vendor that would cause the total expenditure to reach or exceed \$15,000 within a two-year period
 - b. Property Matters:
 - i. All contracts involving the rental, lease or sub-lease of any property owned by Plast Ukrainian Scouting Organization USA
 - ii. All contracts involving the rental, lease or sub-lease of any property currently leased by Plast Ukrainian Scouting Organization USA
 - c. Financial Obligations:
 - i. All contracts involving borrowing or lending money, regardless of amount
 - ii. All contracts involving financial instruments or debt obligations, excluding normal investment instruments.
2. Review Process: All contracts meeting the above criteria must be submitted to KPS in a timely manner. Contracts must be emailed to Holova@plastusa.org, GeneralCounsel@plastusa.org and KPS-finance@plastusa.org. KPS will coordinate the review process with general counsel. KPS will evaluate each contract within fourteen (14) days of receipt, during which time they may approve the contract, request modifications, or provide feedback. In cases where revisions are needed, KPS will collaborate with the parties to refine subsequent contract drafts until final approval is achieved.

NOTE: Contract values will be evaluated based on the total potential commitment, including all renewal options, service fees and related costs.

3. No contracts meeting these criteria may be executed prior to completion of legal review and written approval from a KPS officer.



Approval Process Standards

KPS shall review all submissions in good faith and use best efforts to process approvals in a timely manner. Reviews will be conducted objectively, focusing on legal compliance, financial impact, risk assessment, and organizational policies.

KPS commits to:

1. Acting in good faith when evaluating all submissions,
2. Making best efforts to facilitate project approvals that meet organizational requirements,
3. Providing constructive feedback when issues are identified,
4. Working collaboratively to resolve concerns that may impact approval, and
5. Processing reviews within the specified timeframes.

If KPS identifies legitimate concerns, they will work in good faith with the submitting party to address these issues constructively. Any denial of approval must be based on specific, documented criteria rather than subjective assessments, and must include written explanation of the concerns identified.

Compliance

Failure to comply with these requirements may result in disciplinary action and/or personal liability for unauthorized commitments.

Policy Review

This policy will be reviewed annually and updated as needed.

Effective Date: January 29, 2025

Last Reviewed: January 29, 2025