

### Charitable Donation Guidelines, Priorities, Criteria and Constraints

The Matson Foundation will consider all qualified non-profit organizations that meet our guidelines.

#### Definition

A donation is a cash gift or material goods purchased by the Matson Foundation for an organization. In order to be eligible for a donation, your organization must be a qualified charity or non-profit community organization.

#### Guidelines

We will prioritize donations to organizations or programs which serve the communities in which Matson has, or anticipates having, a significant presence or which enhance business development opportunities for the company; are actively supported by Matson employees; are cost-effective and likely to be sustainable; have plans for measurable results.

#### **Our Priorities/Areas of Interest**

While we seek to support a wide range of community needs, donations will generally be made to charitable non-profits that have the greatest opportunity for positively affecting the communities Matson serves and are focused in one of the following categories:

- Maritime environment and ocean resource conservation, energy
- Education, via schools (pre-school through university), including STEM programs and transportation careers training and development, and via matching gifts from eligible donors
- Human services: such as community health & safety needs; national health organizations and United Way partner agencies
- Culture & Arts: cultural and learning centers/libraries, cultural identity, historic presence
- Civic and community programs (e.g. volunteerism, clean-ups, events and projects)

#### Constraints

Donations will not be made to or on behalf of individuals or to support political activities or organizations established to primarily influence legislation. We are unlikely to contribute to endowments. Generally, only one donation will be given in a calendar year to any non-profit organization.

In order to ensure compliance with the U.S. Foreign Corrupt Practices Act, the Matson Foundation cannot give a donation to an organization located outside of the United States unless the following criteria are met:

- It has been determined that Matson, Inc. and its subsidiaries have no matters awaiting decision by any foreign government or official having an interest in the organization.
- The Matson Foundation has obtained the prior written approval of the Chief Legal Officer or the Controller of Matson, Inc.

If the donation is for the purchase of specified material goods, it is preferable for the Matson Foundation to purchase the material goods for the organization, rather than making a cash donation to the organization. Matson Foundation representatives should make the presentation of the donation to the organization in public.

# **Evaluation Criteria**

Our considerations will include:

- The funds available for donations, which will be based on Matson's operating results.
- Whether the charity is supported by Matson employees as volunteers or as donors.
- Whether the activity or need to be served is in the geographic area served by Matson or where Matson has a significant business operation.
- Evidence the organization has developed the confidence and support of other funders.
- Matson's prior support for similar or duplicative organizations.
- Any other factor relevant to the application at hand.

## NOTE:

- Matson will not make automatic annual contributions to any organization.
- With rare exception, Matson does not wish to be the sole funder.

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