

(Rev. January 2020)

Department of the Treasury
Internal Revenue Service

Do not enter social security numbers on this form as it may be made public.

Go to www.irs.gov/Form1023 for instructions and the latest information.**Note:** *If exempt status is approved, this application will be open for public inspection.*

Use the "?" buttons throughout this form for help in completing this application. For additional help, call IRS Exempt Organizations Customer Account Services toll-free at 1-877-829-5500.

If you cannot complete required responses within the textbox limits throughout this form, upload your additional narratives with the other required documents.

Part I Identification of Applicant

1a Full Name of Organization (exactly as it appears in your organizing document) GREEN COMMUNITY CAPITAL COLLABORATIVE INC			b Care of Name (if applicable)		
c Mailing Address (Number, street and room/suite) 7550 WISCONSIN AVENUE 8TH FLOOR		d City BETHESDA		e Country United States	
f State MD		g Zip Code + 4 20814	h Foreign Province (or State)		i Foreign Postal Code
2 Employer Identification Number 92-2069788		3 Month Tax Year Ends DECEMBER		4 Person to Contact if More Information is Needed (officer, director, trustee, or authorized representative) CHELSEA RUBIN	
5 Contact Telephone Number 202-739-5284		6 Fax Number (optional) 202-739-3001		7 User Fee Submitted \$600.00	

8 Organization's Website (if available):**9** List the names, titles, and mailing addresses of your officers, directors, and/or trustees.

First Name: FREDERICK		Last Name: HARVEY III		Title: DIRECTOR	
Mailing Address: 7550 WISCONSIN AVENUE 8TH FLOOR			City: BETHESDA		
State (or Province): MARYLAND			Zip Code (or Foreign Postal Code): 20814		
First Name: JENNIFER		Last Name: PRYCE		Title: DIRECTOR & PRESIDENT	
Mailing Address: 7550 WISCONSIN AVENUE 8TH FLOOR			City: BETHESDA		
State (or Province): MARYLAND			Zip Code (or Foreign Postal Code): 20814		
First Name: DEREK		Last Name: STROCHER		Title: TREASURER	
Mailing Address: 7550 WISCONSIN AVENUE 8TH FLOOR			City: BETHESDA		
State (or Province): MARYLAND			Zip Code (or Foreign Postal Code): 20814		
First Name: EMMELINE		Last Name: LIU		Title: SECRETARY	
Mailing Address: 7550 WISCONSIN AVENUE 8TH FLOOR			City: BETHESDA		
State (or Province): MARYLAND			Zip Code (or Foreign Postal Code): 20814		
First Name: BETH		Last Name: BAFFORD		Title: VICE PRESIDENT	
Mailing Address: 7550 WISCONSIN AVENUE 8TH FLOOR			City: BETHESDA		
State (or Province): MARYLAND			Zip Code (or Foreign Postal Code): 20814		

 Check here to add more officers, directors, and/or trustees.

Part II Organizational Structure

- 1** You must be a corporation, limited liability company (LLC), unincorporated association, or trust to be tax exempt.

Select your type of organization.

Corporation

At the end of this form, you must upload a copy of your articles of incorporation (and any amendments) that shows proof of filing with the appropriate state agency.

Limited Liability Company (LLC)

At the end of this form, you must upload a copy of your articles of organization (and any amendments) that shows proof of filing with the appropriate state agency. Also, if you adopted an operating agreement, upload a copy, along with any amendments.

Unincorporated Association

At the end of this form, you must upload a copy of your articles of association, constitution, or other similar organizing document that is dated and includes at least two signatures. Include signed and dated copies of any amendments.

Trust

At the end of this form, you must upload a signed and dated copy of your trust agreement. Include signed and dated copies of any amendments.

- 2** Enter the date you formed. (MM/DD/YYYY)

10/31/2022

- 3** Select your state (or U.S. territory) of incorporation or other formation. If you were formed under the laws of a foreign country, select Foreign Country.

Delaware

- 4** Have you adopted bylaws? If "Yes," at the end of this form, upload a current copy showing the date of adoption. If "No," explain how you select your officers, directors, or trustees.

Yes No

- 5** Are you a successor to another organization?

Yes No

Answer "Yes" if you have taken or will take over the activities of another organization, you took over 25% or more of the fair market value of the net assets of another organization, or you were established upon the conversion of an organization from for-profit to nonprofit status. If "Yes," complete Schedule G.

Part III Required Provisions in Your Organizing Document

Part III helps ensure that, when you submit this application, your organizing document contains the required provisions to meet the organizational test under section 501(c)(3).

If you cannot check "Yes" in both Lines 1 and 2, your organizing document does not meet the organizational test. DO NOT file this application until you have amended your organizing document. Remember to upload your original and amended organizing documents at the end of this form.

- 1** Section 501(c)(3) requires that your organizing document limit your purposes to one or more exempt purposes within section 501(c)(3), such as charitable, religious, educational, and/or scientific purposes.

The following is an example of an acceptable purpose clause: The organization is organized exclusively for charitable, religious, educational, and scientific purposes under section 501(c)(3) of the Internal Revenue Code, or corresponding section of any future federal tax code.

Does your organizing document meet this requirement?

Yes No

- 1a** State specifically where your organizing document meets this requirement, such as a reference to a particular article or section in your organizing document (Page/Article/Paragraph):

Page 1, Third Article

- 2** Section 501(c)(3) requires that your organizing document provide that upon dissolution, your remaining assets be used exclusively for section 501(c)(3) exempt purposes, such as charitable, religious, educational, and/or scientific purposes. Depending on your entity type and the state in which you are formed, this requirement may be satisfied by operation of state law.

The following is an example of an acceptable dissolution clause: Upon the dissolution of this organization, assets shall be distributed for one or more exempt purposes within the meaning of section 501(c)(3) of the Internal Revenue Code, or corresponding section of any future federal tax code, or shall be distributed to the federal government, or to a state or local government, for a public purpose.

Does your organizing document meet this requirement?

Yes No

- 2a** State specifically where your organizing document meets this requirement, such as a reference to a particular article or section in your organizing document (Page/Article/Paragraph) or indicate that you rely on state law.

Page 2, Sixth Article

Part IV Your Activities

1 Describe completely and in detail your past, present, and planned activities. Do not refer to or repeat the purposes in your organizing document.

For each past, present, or planned activity, include information that answers the following questions:

- a. What is the activity?
- b. Who conducts the activity?
- c. Where is the activity conducted?
- d. What percentage of your total time is allocated to the activity?
- e. How is the activity funded (for example, donations, fees, etc.) and what percentage of your overall expenses is allocated to this activity?
- f. How does the activity further your exempt purposes?

Green Community Capital Collaborative (the 'Organization') is a Delaware non-profit corporation formed for charitable, educational, and scientific purposes. The Organization's principal focus is on mitigating the adverse effects of climate change and increasing the adoption of solutions to help significantly lower greenhouse gas emissions. Specifically, the Organization plans enable low-income and disadvantaged communities to deploy or benefit from zero-emission technologies. The Organization's activities are further described in Attachment A.

Part IV Your Activities *(continued)*

2 Enter the 3-character NTEE Code that best describes your activities.

Or check here if you want the IRS to select the NTEE Code that best describes your activities.

3 Do any of your programs limit the provision of goods, services, or funds to a specific individual or group of specific individuals? For example, answer "Yes" if goods, services, or funds are provided only for a particular individual, your members, individuals who work for a particular employer, or graduates of a particular school. If "Yes," explain the limitation and how recipients are selected for each program.

 Yes No

4 Do any individuals who receive goods, services, or funds through your programs have a family or business relationship with any officer, director, trustee, or with any of your highest compensated employees or highest compensated independent contractors? If "Yes," explain how these related individuals are eligible for goods, services, or funds.

 Yes No

5 Do you or will you support or oppose candidates in political campaigns in any way? If "Yes," explain.

 Yes No

6 Do you or will you attempt to influence legislation? If "Yes," explain how you attempt to influence legislation.

 Yes No

Part IV Your Activities (continued)

- 6a** Did you or will you make an election to have your legislative activities measured by expenditures by filing Form 5768? Yes No
If "No," describe whether your attempts to influence legislation are a substantial part of your activities. Include the time and money spent on your attempts to influence legislation as compared to your total activities.

- 7** Do you or will you publish, own, or have rights in music, literature, tapes, artworks, choreography, scientific discoveries, or other intellectual property? If "Yes," describe who owns or will own any copyrights, patents, or trademarks, whether fees are or will be charged, how the fees are determined, and how any items are or will be produced, distributed, and marketed. Yes No

- 8** Do you or will you provide educational information to the general public on budgeting, personal finance, financial literacy, saving and spending practices, the sound use of consumer credit, and/or assist individuals and families with financial problems such as credit card debt and foreclosure by providing them with counseling? If "Yes," explain. Yes No

- 9** Do you or will you make grants, loans, or other distributions to organizations? If "Yes," describe the type and purpose of the grants, loans, or distributions, how you select your recipients including submission requirements (such as grant proposals or application forms), and the criteria you use or will use to select recipients. Also describe how you ensure the grants, loans, and other distributions are or will be used for their intended purposes (including whether you require periodic or final reports on the use of funds and any procedures you have if you identify that funds are not being used for their intended purposes). Finally, describe the records you keep with respect to grants, loans, or other distributions you make and identify any recipient organizations and any relationships between you and the recipients. If "No," continue to Line 10. Yes No

As further explained in Attachment A, the Organization will make grants, loans, and provide other forms of financial assistance to organizations to enable low income and disadvantaged communities to deploy or benefit from zero-emission technologies. The Organization will enter into written loan and grant agreements with its borrowers and grantees as it establishes a formal loan and grant process. The Organization will keep detailed records with respect to its loans and grants. It will request periodic technical and financial reports from borrowers and grantees and review the reports to ensure that funds are being spent in accordance with the terms of each agreement. If the Organization discovers any misuse of funds, it will take all reasonably appropriate action to recover and/or redirect the use of its funds for their intended purpose.

Part IV Your Activities (continued)

- 9a** Do you or will you make grants, loans, or other distributions to organizations that are not recognized by the IRS as tax exempt under section 501(c)(3)? If "Yes," name and/or describe the non-section 501(c)(3) organizations to whom you do or will make distributions and explain how these distributions further your exempt purposes. Yes No

The Organization may provide loans or grants to organizations that are not recognized as section 501(c)(3) organizations in furtherance of its charitable purposes, but has not yet made any loans or grants to organizations. The Organization will enter into written loan and grant agreements, keep detailed records, request periodic technical and financial reports, and take action to recover or redirect any misused funds.

- 9b** Do you or will you make grants, loans, or other distributions to foreign organizations? If "Yes," name each foreign organization (if not already provided), the country and region within each country in which each foreign organization operates, any relationship you have with each foreign organization, and whether the foreign organization accepts contributions earmarked for a specific country or organization (if so, specify which countries or organizations). If "No," continue to Line 10. Yes No

- 9c** Do your contributors know that you have ultimate authority to use contributions made to you at your discretion for purposes consistent with your exempt purposes? If "Yes," describe how you relay this information to contributors. Yes No

- 9d** Do you or will you make pre-grant inquiries about the recipient organization? If "Yes," describe these inquiries, including whether you inquire about the recipient's financial status, its tax-exempt status under the Internal Revenue Code, its ability to accomplish the purpose for which the resources are provided, and other relevant information. Yes No

- 9e** Do you or will you use any additional procedures to ensure that your distributions to foreign organizations are used in furtherance of your exempt purposes? If "Yes," describe these procedures, including periodic reporting requirements, auditing grantees, site visits by your employees or compliance checks by impartial experts, etc., to verify that grant funds are being used appropriately. Yes No

Part IV Your Activities (continued)

- 9f** Do you share board members or other key personnel with the recipient organization(s)? If "Yes," identify the relationships. Yes No

- 9g** When you make grants, loans, or other distributions to foreign organizations, will you check the OFAC List of Specially Designated Nationals and Blocked Persons for names of individuals and entities with whom you are dealing to determine if they are included on the list? Describe any other practices you will engage in to ensure that foreign expenditures or grants are not diverted to support terrorism or other non-charitable activities. Yes No

- 9h** Will you comply with all United States statutes, executive orders, and regulations that restrict or prohibit U.S. persons from engaging in transactions and dealings with designated countries, entities, or individuals, or otherwise engaging in activities in violation of economic sanctions administered by OFAC? Yes No

- 9i** Will you acquire from OFAC the appropriate license and registration where necessary? Yes No

- 10** Do you or will you operate in a foreign country or countries? If "Yes," name each foreign country and region within each country in which you do or will operate and describe your operations in each one. If "No," continue to Line 11. Yes No

- 10a** When you conduct activities in foreign countries, will you check the OFAC List of Specially Designated Nationals and Blocked Persons for names of individuals and entities with whom you are dealing to determine if they are included on the list? Describe any other practices you will engage in to ensure that foreign expenditures or grants are not diverted to support terrorism or other non-charitable activities. Yes No

- 10b** Will you comply with all United States statutes, executive orders, and regulations that restrict or prohibit U.S. persons from engaging in transactions and dealings with designated countries, entities, or individuals, or otherwise engaging in activities in violation of economic sanctions administered by OFAC? Yes No

- 10c** Will you acquire from OFAC the appropriate license and registration where necessary? Yes No

Part IV Your Activities (continued)

- 11** Are you a sponsoring organization that maintains one or more donor advised funds? If yes, please provide a complete description of your program, including the specific advice that such donors may provide. Describe in detail the control you maintain (or will maintain) over the use of the funds. Yes No

- 12** Do you or will you operate a school? Yes No
If "Yes," complete Schedule B.

- 13** Is your principal purpose or function to provide hospital or medical care? Yes No
If "Yes," complete Schedule C.

- 14** Do you or will you provide low-income housing? Yes No
If "Yes," complete Schedule F.

- 15** Do you or will you provide scholarships, fellowships, educational loans, or other educational grants to individuals, including grants for travel, study, or other similar purposes? Yes No
If "Yes," complete Schedule H - Section I.

- 16** Check any of the following fundraising activities that you will undertake (check all that apply):

- | | |
|--|--|
| <input checked="" type="checkbox"/> Website, mail, email, personal, and/or phone solicitations | <input checked="" type="checkbox"/> Foundation grant solicitations |
| <input checked="" type="checkbox"/> Receive donations from another organization's website | <input checked="" type="checkbox"/> Government grant solicitations |
| <input type="checkbox"/> Bingo | <input type="checkbox"/> Other (non-bingo) gaming activities |
| <input type="checkbox"/> Other (describe) | |

- We will not engage in fundraising activities.

- 17** Do you or will you engage in fundraising activities for other organizations? If "Yes," describe these arrangements, including the names or descriptions of the organizations for which you raise funds. Yes No

Part V Compensation and Other Financial Arrangements

- 1** Do you or will you compensate officers, directors, or trustees, or do or will you have highest compensated employees, or highest compensated independent contractors? If "No," continue to Line 2. Yes No

In establishing compensation for your officers, directors, trustees, highest compensated employees, and highest compensated independent contractors:

- 1a** Do or will the individuals that approve compensation arrangements follow a conflict of interest policy? Yes No
- 1b** Do or will you approve compensation arrangements in advance of paying compensation? Yes No
- 1c** Do or will you document in writing the date and terms of approved compensation arrangements? Yes No
- 1d** Do or will you record in writing the decision made by each individual who decided or voted on compensation arrangements? Yes No
- 1e** Do or will you approve compensation arrangements based on information about compensation paid by similarly situated taxable or tax-exempt organizations for similar services, current compensation surveys compiled by independent firms, or actual written offers from similarly situated organizations? Yes No
- 1f** Do or will you record in writing both the information on which you relied to base your decision and its source? Yes No
- 1g** Do or will you have any other practices you use to set reasonable compensation? If "Yes," describe these practices. Yes No

- 2** Have you adopted a conflict of interest policy consistent with the sample conflict of interest policy in Appendix A to the instructions? If you are a hospital, answer "Yes" if your conflict of interest policy includes provisions consistent with the additional healthcare related provisions in the sample document. If "No," describe the procedures you will follow to ensure that persons who have a conflict of interest will not have influence over setting their own compensation or regarding business deals with themselves. Yes No

- 3** Do you or will you compensate any of your officers, directors, trustees, highest compensated employees, and highest compensated independent contractors through non-fixed payments, such as discretionary bonuses or revenue-based payments? If "Yes," describe all non-fixed compensation arrangements, including how the amounts are determined, who is eligible for such arrangements, whether you place a limitation on total compensation, and how you determine or will determine that you pay no more than reasonable compensation for services. Yes No

Part V Compensation and Other Financial Arrangements (continued)

- 4 Do you or will you purchase or sell any goods, services, or assets from or to: (i) any of your officers, directors, or trustees; (ii) any family of any of your officers, directors, or trustees; (iii) any organizations in which any of your officers, directors, or trustees are also officers, directors, or trustees, or in which any individual officer, director, or trustee owns more than a 35% interest; (iv) your highest compensated employees; or (v) your highest compensated independent contractors? If "Yes," describe any such transactions that you made or intend to make, with whom you make or will make such transactions, how the terms are or will be negotiated at arm's length, and how you determine you pay no more than fair market value or you are paid at least fair market value. Yes No

The Organization entered into an agreement dated January 1, 2023 for shared services and facilities with Calvert Impact Capital Inc. ('Calvert'), a section 501(c)(3) public charity that is affiliated with the Organization. Currently, all of the Organization's directors and officers serve as directors, officers or employees of Calvert or other section 501(c)(3) public charities affiliated with Calvert. The terms of the agreement are based on a sharing of the services between the two organizations on a cost reimbursement basis with each section 501(c)(3) organization paying no more than fair market value.

- 5 Do you or will you have any leases, contracts, loans, or other agreements with: (i) your officers, directors, or trustees; (ii) any family of any of your officers, directors, or trustees; (iii) any organizations in which any of your officers, directors, or trustees are also officers, directors, or trustees, or in which any individual officer, director, or trustee owns more than a 35% interest; (iv) your highest compensated employees; or (v) your highest compensated independent contractors? If "Yes," describe any written or oral arrangements that you made or intend to make, with whom you have or will have such arrangements, how the terms are or will be negotiated at arm's length, and how you determine you pay no more than fair market value or you are paid at least fair market value. Yes No

- 6 Do you or will you contract with another organization to develop, build, market, or finance your facilities? If "Yes," describe each facility, the role of the other organization, and any business or family relationship between the organization and your officers, directors, or trustees. Explain how that entity is selected, how the terms of any contract(s) are negotiated at arm's length, and how you determine you will pay no more than fair market value for services. Yes No

Part V Compensation and Other Financial Arrangements (continued)

- 7 Does or will someone other than your own employees or volunteers manage your activities or facilities? Yes No
- If "Yes," describe the activities or facilities that will be managed by others, the names of the persons or organizations that manage or will manage your activities or facilities, and any business or family relationship between the organization and your officers, directors, or trustees. Explain how these managers were or will be selected, how the terms of any contracts or other agreements were or will be negotiated, and how you determine you will pay no more than fair market value for services.

- 8 Do you participate in any joint ventures, including partnerships or limited liability companies treated as partnerships, in which you share profits and losses with partners? If "Yes," state your ownership percentage in each joint venture, list your investment in each joint venture, describe the tax status of other participants in each joint venture (including whether they are section 501(c)(3) organizations), describe the activities of each joint venture, describe how you exercise control over the activities of each joint venture, and describe how each joint venture furthers your exempt purposes. Yes No

Part VI Financial Data

- 1 Select the option that best describes you to determine the years of revenues and expenses you need to provide.
- You completed less than one tax year.
Provide a total of three years of financial information (including the current year and two future years of reasonable and good faith projections of your future finances) in the following Statement of Revenues and Expenses.
 - You completed at least one tax year but fewer than five.
Provide a total of four years financial information (including the current year and three years of actual financial information or reasonable and good faith projections of your future finances) in the following Statement of Revenues and Expenses.
 - You completed five or more tax years.
Provide financial information for your five most recent tax years (including the current year) in the following Statement of Revenues and Expenses.

Part VI Financial Data (continued)

A. Statement of Revenues and Expenses

Type of revenue	Current tax year	4 prior tax years or 2 succeeding tax years			
		From: 01/01/2023 To: 12/31/2023	From: 10/31/2022 To: 12/31/2022	From: 01/01/2024 To: 12/31/2024	From: 01/01/2025 To: 12/31/2025
1 Gifts, grants, and contributions received (do not include unusual grants)	\$500,000.	\$0.	\$999,999,999.	\$999,999,999.	
2 Membership fees received					
3 Gross investment income					
4 Net unrelated business income					
5 Taxes levied for your benefit					
6 Value of services or facilities furnished by a governmental unit without charge (not including the value of services generally furnished to the public without charge)					
7 Any revenue not otherwise listed above or in lines 9 - 12 below (provide an itemized list below)					
8 Total of lines 1 through 7	\$500,000.	\$0.	\$999,999,999.	\$999,999,999.	\$0.
9 Gross receipts from admissions, merchandise sold or services performed, or furnishing of facilities in any activity that is related to your exempt purposes (provide an itemized list below)					
10 Total of lines 8 and 9	\$500,000.	\$0.	\$999,999,999.	\$999,999,999.	\$0.
11 Net gain or loss on sale of capital assets (provide an itemized list below)					
12 Unusual grants (provide an itemized list below)					
13 Total Revenue (add lines 10 through 12)	\$500,000.	\$0.	\$999,999,999.	\$999,999,999.	\$0.
Type of expense	Current tax year	4 prior tax years or 2 succeeding tax years			
14 Fundraising expenses	\$50,000.	\$0.	\$0.	\$0.	
15 Contributions, gifts, grants, and similar amounts paid out (provide an itemized list below)	\$0.	\$0.	\$100,000,000.	\$100,000,000.	
16 Disbursements to or for the benefit of members (provide an itemized list below)					
17 Compensation of officers, directors, and trustees	\$100,000.	\$0.	\$1,000,000.	\$1,000,000.	
18 Other salaries and wages					
19 Interest expense					
20 Occupancy (rent, utilities, etc.)	\$0.	\$0.	\$200,000.	\$200,000.	
21 Depreciation and depletion					
22 Professional fees	\$0.	\$0.	\$1,000,000.	\$1,000,000.	
23 Any expense not otherwise classified, such as program services (provide an itemized list below)	\$100,000.	\$0.	\$1,000,000.	\$1,000,000.	
24 Total Expenses (add lines 14 through 23)	\$250,000.	\$0.	\$103,200,000.	\$103,200,000.	\$0.

25 Itemized financial data

Line 15 provides estimated value of grants for clean energy and climate projects that reduce or avoid greenhouse gas emissions, especially in disadvantaged communities, as authorized under the Inflation Reduction Act of 2022. Grantees and grant amounts have not yet been identified.
 Attachment B
 Line 23: see

Part VI Financial Data (continued)

B. Balance Sheet (for your most recently completed tax year)		Year End: 12/31/2022
Assets		
1	Cash	\$0.
2	Accounts receivable, net	\$0.
3	Inventories	\$0.
4	Bonds and notes receivable (provide an itemized list below)	\$0.
5	Corporate stocks (provide an itemized list below)	\$0.
6	Loans receivable (provide an itemized list below)	\$0.
7	Other investments (provide an itemized list below)	\$0.
8	Depreciable assets (provide an itemized list below)	\$0.
9	Land	\$0.
10	Other assets (provide an itemized list below)	\$0.
11	Total Assets (add lines 1 through 10)	\$0.
Liabilities		
12	Accounts payable	\$0.
13	Contributions, gifts, grants, etc. payable	\$0.
14	Mortgages and notes payable (provide an itemized list below)	\$0.
15	Other liabilities (provide an itemized list below)	\$0.
16	Total Liabilities (add lines 12 through 15)	\$0.
Fund Balances or Net Assets		
17	Total fund balances or net assets	\$0.
18	Total Liabilities and Fund Balances or Net Assets (add lines 16 and 17)	\$0.

19 Itemized financial data

Part VII Foundation Classification

Part VII is designed to classify you as an organization that is either a private foundation or a public charity. Public charity classification is a more favorable tax status than private foundation classification. If you are a private foundation, this part will further determine whether you are a private operating foundation.

1 Select the foundation classification you are requesting from the list below.

- You are described in 509(a)(1) and 170(b)(1)(A)(vi) as an organization that receives a substantial part of its financial support in the form of contributions from publicly supported organizations, from a governmental unit, or from the general public.
- You are described in 509(a)(2) as an organization that normally receives not more than one-third of its financial support from gross investment income and receives more than one-third of its financial support from contributions, membership fees, and gross receipts from activities related to its exempt functions (subject to certain exceptions).
- You are described in 509(a)(1) and 170(b)(1)(A)(i) as a church or a convention or association of churches. Complete Schedule A.
- You are described in 509(a)(1) and 170(b)(1)(A)(ii) as a school. Complete Schedule B.
- You are described in 509(a)(1) and 170(b)(1)(A)(iii) as a hospital, a cooperative hospital service organization, or a medical research organization operated in conjunction with a hospital. Complete Schedule C.
- You are described in 509(a)(1) and 170(b)(1)(A)(iv) as an organization operated for the benefit of a college or university that is owned or operated by a governmental unit.
- You are described in 509(a)(1) and 170(b)(1)(A)(ix) as an agricultural research organization directly engaged in the continuous active conduct of agricultural research in conjunction with a college or university.
- You are described in 509(a)(3) as an organization supporting either one or more organizations described in 509(a)(1) or 509(a)(2) or a publicly supported section 501(c)(4), (5), or (6) organization. Complete Schedule D.
- You are described in 509(a)(4) as an organization organized and operated exclusively for testing for public safety.
- You are a publicly supported organization and would like the IRS to decide your correct classification.
- You are a private foundation.

- 1a** As a private foundation, section 508(e) requires special provisions in your organizing document in addition to those that apply to all organizations described in section 501(c)(3). Check this box to confirm that your organizing document includes these provisions or you rely on state law.

State specifically where your organizing document meets this requirement, such as a reference to a particular article or section in your organizing document (Page/Article/Paragraph) or state that you rely on state law.

- 1b** Do you or will you provide scholarships, fellowships, educational loans, or other educational grants to individuals, including grants for travel, study, or other similar purposes? Yes No
If "Yes," complete Schedule H - Section II.

- 1c** Are you a private operating foundation? Yes No

To be a private operating foundation you must engage directly in the active conduct of charitable, religious, educational, and similar activities, as opposed to indirectly carrying out these activities by providing grants to individuals or other organizations.

Part VII Foundation Classification (continued)

- 1d** Describe how you meet the requirements for private operating foundation status, including how you meet the income test and either the assets test, the endowment test, or the support test. If you've been in existence for less than one year, describe how you are likely to satisfy the requirements for private operating foundation status.

- 2** If you have been in existence more than 5 years, you must confirm your public support status. To confirm your qualification as a public charity described in 509(a)(1) and 170(b)(1)(A)(vi) in existence for five or more tax years, you must have received one-third or more of your total support from governmental agencies, contributions from the general public, and contributions or grants from other public charities; or 10% or more of your total support from governmental agencies, contributions from the general public, and contributions or grants from other public charities and the facts and circumstances indicate you are a publicly supported organization. Calculate whether you meet this support test for your most recent five-year period.

- i. Did you receive contributions from any person, company, or organization whose gifts totaled more than the 2% amount of line 8 in Part VI-A? Yes No

If "Yes," identify each person, company, or organization by letter (A, B, C, etc.) and indicate the amount contributed by each. Keep a list showing the name of and amount contributed by each of these donors for your records.

- ii. Based on your calculations, did you receive at least one-third of your support from public sources or did you normally receive at least 10 percent of your support from public sources and you have other characteristics of a publicly supported organization? Yes No

- 2a** If you have been in existence more than 5 years, you must confirm your public support status. To confirm your qualification as a public charity described in 509(a)(2) in existence for five or more tax years, you must have normally received more than one-third of your support from contributions, membership fees, and gross receipts from activities related to your exempt functions, or a combination of these sources, and not more than one-third of your support from gross investment income and net unrelated business income. Calculate whether you meet this support test for your most recent five-year period.

- i. Did you receive amounts from any disqualified persons? Yes No

If "Yes," identify each disqualified person by letter (A, B, C, etc.) and indicate the amount contributed by each. Keep a list showing the name of and amount contributed by each of these donors for your records.

- ii. Did you receive amounts from individuals or organizations other than disqualified persons that exceeded the greater of \$5,000 or 1% of the amount on line 10 of Part VI-A Statement of Revenues and Expenses? Yes No

If "Yes," identify each individual or organization by letter (A, B, C, etc.) and indicate the amount contributed by each. Keep a list showing the name of and amount contributed by each of these donors for your records.

- iii. Based on your calculations, did you normally receive more than one-third of your support from a combination of gifts, grants, contributions, membership fees, and gross receipts (from permitted sources) from activities related to your exempt functions and normally receive not more than one-third of your support from investment income and unrelated business taxable income? Yes No

Part VIII Effective Date

In general, a determination letter recognizing exemption of an organization described in section 501(c)(3) is effective as of the date of formation of an organization if: (1) its purposes and activities prior to the date of the determination letter have been consistent with the requirements for exemption; and (2) it has filed an application for recognition of exemption within 27 months from the end of the month in which it was organized.

- 1 Are you submitting this application within 27 months of the end of the month in which you were legally formed? Yes No

If "No," complete Schedule E.

Part IX Annual Filing Requirements

If you fail to file a required information return or notice for three consecutive years, your exempt status will be automatically revoked.

- 1 Certain organizations are not required to file annual information returns or notices (Form 990, Form 990-EZ, or Form 990-N, e-Postcard). If you are granted tax-exemption, are you claiming to be excused from filing Form 990, Form 990-EZ, or Form 990-N? Yes No

If "Yes," are you claiming you are excepted from filing because you are:

- A church or association of churches
- An integrated auxiliary (such as a men's or women's organization, religious school, mission society, or religious group)
- A church-affiliated organization (other than a section 509(a)(3) organization) that is exclusively engaged in managing funds or maintaining retirement programs and is described in Revenue Procedure 96-10, 1996-1 C.B. 577
- A school below college level affiliated with a church or operated by a religious order
- A mission society (other than a section 509(a)(3) supporting organization) sponsored by, or affiliated with, one or more churches or church denominations, if more than half of the society's activities are conducted in, or directed at, persons in foreign countries
- An affiliate of a governmental unit that meets the requirements of Revenue Procedure 95-48, 1995-2 C.B. 418 (other than a section 509(a)(3) supporting organization)
- Other (describe)

Part X Signature

- I declare under the penalties of perjury that I am authorized to sign this application on behalf of the above organization and that I have examined this application, and to the best of my knowledge it is true, correct, and complete.

Jennifer Pryce

(Type name of signer)

DIRECTOR & PRESIDENT

(Type title or authority of signer)

02/28/2023

(Date)

Upload checklist:

- Organizing document (and any amendments)
- Bylaws, if adopted
- Form 2848, Power of Attorney and Declaration of Representative (if applicable)
- Form 8821, Tax Information Authorization (if applicable)
- Supplemental responses (if applicable)
- Expedited handling request (if applicable)

Delaware

Page 1

The First State

I, JEFFREY W. BULLOCK, SECRETARY OF STATE OF THE STATE OF DELAWARE, DO HEREBY CERTIFY THE ATTACHED IS A TRUE AND CORRECT COPY OF THE CERTIFICATE OF INCORPORATION OF "GREEN COMMUNITY CAPITAL COLLABORATIVE, INC.", FILED IN THIS OFFICE ON THE THIRTY-FIRST DAY OF OCTOBER, A.D. 2022, AT 2:58 O`CLOCK P.M.




Jeffrey W. Bullock, Secretary of State

7112124 8100
SR# 20223901497

Authentication: 204756061
Date: 11-01-22

You may verify this certificate online at corp.delaware.gov/authver.shtml

GREEN COMMUNITY CAPITAL COLLABORATIVE, INC.

Certificate of Incorporation

The undersigned, for the purpose of forming a corporation pursuant to the General Corporation Law of the State of Delaware ("DGCL"), hereby certifies:

- FIRST:** Name. The name of the corporation is Green Community Capital Collaborative, Inc. ("Corporation").
- SECOND:** Registered Agent. The address of the Corporation's registered office in the State of Delaware is 1209 Orange Street, Wilmington, County of New Castle, Delaware 19801. The name of its registered agent at such address is The Corporation Trust Company.
- THIRD:** Purpose. The Corporation is organized and shall be operated exclusively for charitable, scientific, and educational purposes within the meaning of section 501(c)(3) of the Internal Revenue Code, as it may be amended ("Code"). In furtherance of these purposes, the Corporation may engage in any lawful act for which corporations may be organized under the DGCL.
- FOURTH:** Nonstock and Members. The Corporation is organized as a charitable nonstock corporation as defined in Section 114(d) of the DGCL and shall not have any capital stock. The members of the Corporation shall be, and shall have the rights and duties, as provided in the bylaws.
- FIFTH:** Restrictions. Provisions for the regulation of the activities and affairs of the Corporation, are as follows:
- (a) *No Inurement.* No part of the net earnings of the Corporation shall be distributed to or inure to the benefit of its members, directors, officers, or other private persons, except that the Corporation may pay reasonable compensation for services rendered to or for the Corporation and make payments and distributions in furtherance of the purposes of the Corporation.
 - (b) *Legislative and Political Activity.* No substantial part of the activities of the Corporation shall be the carrying on of propaganda or otherwise attempting to influence legislation in a manner or to an extent that would disqualify the Corporation for tax exemption under section 501(c)(3) of the Code. The Corporation shall not participate or intervene in (including the publication or distribution of statements concerning) any political campaign on behalf of or in opposition to any candidate for public office.
 - (c) *Permitted Activities.* Notwithstanding any other provision of this certificate of incorporation, the Corporation shall not carry on any activity that is not permitted to be carried on by: (i) an organization described in

section 501(c)(3) of the Code; or (ii) by an organization the contributions to which are deductible under sections 170(c)(2), 2055(a)(2) or 2522(a)(2) of the Code.

SIXTH: Dissolution. Upon dissolution, after payment of all valid debts of the Corporation and necessary expenses thereof, or provision for same, all the remaining assets shall be distributed for one or more exempt purposes within the meaning of section 501(c)(3) of the Code, or to U.S. federal, state or local governments for a public purpose.

SEVENTH: Amendment of Bylaws. In furtherance and not in limitation of the powers conferred by law, subject to any limitations contained elsewhere in this certificate of incorporation or the bylaws, the board of directors is authorized to make, repeal, alter, amend or rescind the bylaws of the Corporation.

EIGHTH: Liability. To the fullest extent permitted by law, a director of the Corporation shall not be personally liable to the Corporation or its members for monetary damages for breach of fiduciary duty as a director. Any amendment to or repeal of this Article shall not apply to or have any effect on the liability or alleged liability of any director with respect to any acts or omissions of such director occurring prior to such amendment or repeal.

IN WITNESS WHEREOF, this Certificate of Incorporation has been executed by the incorporator on this 31st day of October, 2022.



Name: Chelsea Rubin
Title: Incorporator
Address: 1111 Pennsylvania Ave., NW
Washington, DC 20004

State of Delaware
Secretary of State
Division of Corporations
Delivered 02:58 PM 10/31/2022
FILED 02:58 PM 10/31/2022
SR 20223901497 - File Number 7112124

BYLAWS
OF
GREEN COMMUNITY CAPITAL COLLABORATIVE, INC.

ARTICLE I

MEMBERS

1.1. Membership. Green Community Capital Collaborative, Inc. (“Corporation”) shall have one class of membership. The sole member of the Corporation shall be [Calvert Impact, Inc.] (the “Member”), acting through its Board of Directors or by or through any person or persons designated by that Board to act on behalf of the Member.

1.2. Meetings. Annual or other regular meetings of the Member are not required. Special meetings of the Member may be called by the Chair (as defined below), the President, the Secretary, the board of directors of the Corporation (“Board”), or the Member.

1.3. Action by Written Consent in Lieu of a Meeting. Any action required or permitted to be taken at a meeting by the Member may, except as otherwise provided by law, the certificate of incorporation or these bylaws, be taken without a meeting, without prior notice, and without a vote, if the Member consents to such action in writing and the writing is filed with the records of the Corporation.

ARTICLE II

BOARD OF DIRECTORS

2.1. General Powers. The business and affairs of the Corporation shall be managed by or under the direction of the Board, which may exercise all of the powers permitted to or conferred on a board of directors, except as limited by the certificate of incorporation, these bylaws, and those powers expressly reserved to the Member. The Board may adopt such rules and procedures, not inconsistent with the certificate of incorporation, these bylaws or applicable law, as it may deem proper for the conduct of its meetings and the management of the Corporation. At least one meeting of Board shall be held each year for the transaction of such business as may properly come before the meeting.

2.2. Number and Term.

(a) The initial directors will be elected by the incorporator. Thereafter, the Member shall elect the directors.

(b) The Member may determine from time to time the number of directors constituting the entire Board. The phrase “entire Board” refers to the total number of voting directors that the Corporation would have if all vacancies were filled.

(c) Each director shall hold office until a successor is duly elected and qualified or until the director’s earlier death, resignation, disqualification or removal.

2.3. Newly Created Directorships and Vacancies. Any newly created directorships resulting from an increase in the authorized number of directors and any vacancies occurring on the Board may be filled by the affirmative vote of a majority of the remaining directors, although less than a quorum, or by a sole remaining director or action of the Member. A director so elected

shall hold office until the expiration of the term of office and a successor is duly elected and qualified, or such director's earlier death, resignation or removal.

2.4. Resignation and Removal. Any director may resign at any time by written notice to the Corporation. Such resignation shall take effect upon receipt thereof by the Corporation, unless otherwise specified in the resignation. Except as prohibited by applicable law or the certificate of incorporation, one or more of the directors may be removed, with or without cause, by the Member.

2.5. Chair of the Board: Vice-Chair of the Board. The Board may appoint from its members a Chair and a Vice-Chair of the Board. Unless otherwise provided by the Board, the Chair of the Board, if one is appointed, shall preside, when present, at all meetings of the Board. The Chair shall have such other powers and shall perform such duties as the Board may from time to time designate. Unless otherwise provided by the Board, in the absence of the Chair, the Vice Chair, if one is elected, shall preside, when present, at all meetings of the Board. The Vice Chair shall have such other powers and shall perform such duties as the Board may from time to time designate.

2.6. Notice of Meetings and Waiver of Notice.

(a) Notice need not be given of regular meetings of the Board held at times and places fixed by resolution of the Board. Special meetings of the Board may be held at such times and at such places as may be determined by the Chair or the President on at least 24 hours' notice to each director given by means other than by mail or on at least three days' notice if given by mail. Special meetings shall be called by the Chair or the President in like manner and on like notice on the written request of any two or more directors.

(b) Whenever notice to directors is required by applicable law, the certificate of incorporation or these bylaws, a waiver thereof, in writing signed by, or by electronic transmission by, the director entitled to the notice, whether before or after such notice is required, shall be deemed equivalent to notice. Attendance by a director at a meeting shall constitute a waiver of notice of such meeting except when the director attends a meeting for the express purpose of objecting, at the beginning of the meeting, to the transaction of any business on the ground that the meeting was not lawfully called or convened. Neither the business to be transacted at, nor the purpose of, any regular or special Board or committee meeting need be specified in any waiver of notice.

2.7. Quorum and Manner of Acting. The presence of a majority of the entire Board constitutes a quorum. The affirmative vote of a majority of the directors present at a meeting shall be the act of the Board, unless otherwise provided by law, the certificate of incorporation, or these bylaws.

2.8. Action by Unanimous Written Consent in Lieu of a Meeting. Unless otherwise restricted by the certificate of incorporation or these bylaws, any action required or permitted to be taken at any meeting of the Board or of any committee thereof may be taken without a meeting if all directors or members of such committee consent thereto in writing or by electronic

transmission, and the writings or electronic transmissions are filed with the minutes of the Board or committee in accordance with applicable law.

2.9. Meeting by Telephone, Video Conference or Similar Communications Equipment. Directors may participate in any meetings of the Board or any committee thereof through conference calls, video conferences or other forms of communication that permit participants to hear and be heard by all other participants, and such participation shall constitute the presence in person by such director at such meeting.

ARTICLE III

COMMITTEES

3.1. Committee Composition and Authority.

(a) The Board may designate one or more committees. Each committee is to consist of one or more of the directors of the Corporation with such lawfully delegable powers and duties as the Board thereby confers to serve at the pleasure of the Board (each such committee, a “Board Committee”). Any such Board Committee, to the extent provided in the resolution or committee charter approved by the Board and subject to the provisions of law, shall have and may exercise all the powers and authority of the Board in the management of the business and affairs of the Corporation. Any committee composed of any voting members who are not directors shall be advisory in nature only.

(b) No Board Committee shall have the power or authority in reference to: (a) adopting, amending or repealing any of these bylaws, or adopting or amending any provision of the certificate of incorporation, (b) approving, adopting or recommending to the Member any action or matter (other than the election or removal of directors) expressly required by the DGCL to be submitted to the Member for approval, (c) any actions that may require the approval of the entire Board under applicable law, the certificate of incorporation or these bylaws, (d) filling vacancies in the Board or any Board Committee, (e) electing, appointing or removing any member of any Board Committee or any officer, or (f) amending or repealing any resolution of the Board.

3.2. Procedures, Quorum and Subcommittees. Each Board Committee shall keep minutes and make such reports as the Board may from time to time request. Except as the Board may otherwise determine, any Board Committee may make rules for the conduct of its business, but unless otherwise provided by the Board Committee or in such rules, its business shall be conducted as nearly as possible in the same manner as is provided in these bylaws for the Board. The presence of a majority of the then-appointed members of a Board Committee shall constitute a quorum, and the vote of a majority of the members of the Board Committee present shall be the act of such Board Committee. Except as otherwise provided in the certificate of incorporation, these bylaws, or the resolutions of the Board designating the Board Committee, a Board Committee may create one or more subcommittees, each subcommittee to consist of one or more members of the Board Committee, and delegate to a subcommittee any or all of the powers and authority of the Board Committee.

3.3. Action by Unanimous Written Consent in Lieu of a Meeting. Committee action may be taken without a meeting if all the members consent thereto in writing (including by electronic transmission), and the writing or writings are filed with the records of the committee.

ARTICLE IV

OFFICERS

4.1. Election and Qualifications. The Board shall appoint the officers of the Corporation, which shall include a President, Secretary, and Treasurer. The officers may include one or more Vice-Presidents and such assistant secretaries, such assistant treasurers and such other officers as the Board may from time to time determine. Each officer shall have such powers and duties as may be prescribed by these bylaws and as may be assigned by the Board. Any two or more offices may be held by the same person, except that no one person may hold the offices of both President and Treasurer.

4.2. Term. Each officer shall hold office until his or her respective successor is elected and qualified or until his or her earlier death, resignation or removal. Any vacancy in any office arising from any cause may be filled for the unexpired portion of the term by the Board.

4.3. Resignation and Removal. Any officer may resign at any time upon written notice to the Corporation. Any officer may be removed from office, with or without cause, at any time by the Board.

4.4. Duties and Authority. The officers shall have such duties and authority as customarily pertain to their offices except as modified by these bylaws or the Board.

(a) *President.* The President shall have general management and supervision of the property, business and affairs of the Corporation and over its other officers; may appoint and remove assistant officers and other agents and employees, other than officers referred to in this Article; and may execute and deliver in the name of the Corporation powers of attorney, contracts, and other obligations and instruments.

(b) *Secretary.* The Secretary shall prepare or supervise the preparation of the minutes of the meetings and other actions of the Board, its committees and the Member. The Secretary shall give, or cause to be given, required notice of all meetings of the Member and the Board. The Secretary shall have custody of the books, records, and documents (other than those maintained by the Treasurer), and shall attest deeds, contracts, leases and other legal instruments and formal documents and shall perform such other duties as may be assigned by the Board or the President.

(c) *Treasurer.* The Treasurer shall be responsible for the receipt, custody, and disbursement of all monies of the Corporation; shall keep proper books of accounts of such receipts and disbursements; and shall prepare financial statements in such forms and at such times as may be required by the Board or the President.

(d) *Vice-President.* A Vice-President may execute and deliver in the name of the Corporation contracts and other obligations and instruments pertaining to the regular course of

the duties of said office, and shall have such other authority as from time to time may be assigned by the Board or the President.

(e) *Assistant Officers.* Any assistant officer shall have such powers and duties of the officer whom such assistant officer assists as such officer or the Board shall from time to time prescribe.

(f) *Other Officers.* Other officers may be elected by resolution of the Board and shall have such powers and duties as may be prescribed in such resolution.

(g) *Duties of Officers May Be Delegated.* In case any officer is absent, or for any other reason that the Board may deem sufficient, the President or the Board may delegate for the time being the powers or duties of such officer to any other officer or to any director.

ARTICLE V

MISCELLANEOUS PROVISIONS

5.1. Indemnification of Directors and Officers.

(a) The Corporation shall indemnify, and hold harmless, to the fullest extent permitted by applicable law as it presently exists or may hereafter be amended, any person (“Covered Person”) who was or is made or is threatened to be made a party or is otherwise involved in any action, suit or proceeding, whether civil, criminal, administrative or investigative (“Proceeding”), by reason of the fact that such person is or was a director or officer of the Corporation, or while serving as a director or officer of the Corporation, is or was serving at the request of the Corporation as a director, trustee, officer, employee or agent of another company, partnership, joint venture, employee benefit plan, trust or other enterprise, against all liability and loss suffered and expenses (including attorneys’ fees) reasonably incurred by such Covered Person in such Proceeding. Notwithstanding the preceding sentence, except for claims for indemnification (following the final disposition of such Proceeding) or advancement of expenses not paid in full, the Corporation shall be required to indemnify an Indemnified Person in connection with a Proceeding (or part thereof) commenced by such Covered Person only if the commencement of such Proceeding (or part thereof) by the Covered Person was authorized in advance by the Board.

(b) The Corporation shall, to the fullest extent not prohibited by law, pay the expenses (including attorneys’ fees) incurred by an Indemnified Person in defending any Proceeding in advance of its final disposition; *provided, however*, that such payment of expenses in advance of the final disposition of the Proceeding shall be made only upon receipt of an undertaking by the Indemnified Person to repay all amounts advanced if it is ultimately determined that the Indemnified Person is not entitled to be indemnified under this Article or otherwise.

(c) Any right to indemnification or to advancement of expenses of any Indemnified Person arising hereunder shall not be eliminated or impaired by an amendment to or repeal of this Article after the occurrence of the act or omission that is the subject of the Proceeding for which indemnification or advancement of expenses is sought.

(d) The rights conferred on any Indemnified Person by this Article shall not be exclusive of any other rights that such Indemnified Person may have or hereafter acquire under any statute, the certificate of incorporation, these bylaws or any agreement, or any vote of disinterested directors, action of the Member, or otherwise. This Article shall not limit the right of the Corporation, to the extent and in the manner permitted by law, to indemnify or to advance expenses to persons other than Indemnified Persons when and as authorized by appropriate corporate action.

5.2. Manner of Notice and Waiver of Notice. Except as otherwise provided in the certificate of incorporation or these bylaws, notices and waivers of notice shall be in writing and delivered in any manner permitted by the law. Whenever written notice is required, a written waiver signed by the person entitled to notice whether before or after the time stated in such notice, shall be deemed equivalent to notice. Attendance of a person at a meeting shall constitute a waiver of notice of such meeting, except when the person attends the meeting for the express purpose of objecting, at the beginning of the meeting, to the transaction of any business because the meeting is not lawfully called or convened.

5.3. Amendments. Except as otherwise provided in the certificate of incorporation or these bylaws, these bylaws may be amended or repealed, and new bylaws may be adopted by the Member. The Board shall also have the authority to amend or repeal and adopt new bylaws subject to the foregoing power of the Member and except as provided by applicable law.

Adopted by the Incorporator on October 31, 2022.

Power of Attorney and Declaration of Representative

OMB No. 1545-0150

For IRS Use Only

Received by: _____
 Name _____
 Telephone _____
 Function _____
 Date _____

▶ Go to www.irs.gov/Form2848 for instructions and the latest information.

Part I Power of Attorney

Caution: A separate Form 2848 must be completed for each taxpayer. Form 2848 will not be honored for any purpose other than representation before the IRS.

1 Taxpayer information. Taxpayer must sign and date this form on page 2, line 7.

Taxpayer name and address Green Community Capital Collaborative, Inc. 7550 Wisconsin Avenue 8th Floor Bethesda, Maryland 20814	Taxpayer identification number(s) 92-2069788 Daytime telephone number 301-280-6028 Plan number (if applicable)
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hereby appoints the following representative(s) as attorney(s)-in-fact:

2 Representative(s) must sign and date this form on page 2, Part II.

Name and address Tomer Inbar 101 Park Avenue New York, NY 10178-0060 Check if to be sent copies of notices and communications <input checked="" type="checkbox"/>	CAF No. 8006-30359R PTIN P01589512 Telephone No. 212-309-6801 Fax No. 212-309-6001 Check if new: Address <input type="checkbox"/> Telephone No. <input type="checkbox"/> Fax No. <input type="checkbox"/>
Name and address Chelsea R. Rubin 1111 Pennsylvania Avenue, NW Washington, DC 20004 Check if to be sent copies of notices and communications <input checked="" type="checkbox"/>	CAF No. 0315-23057R PTIN P02255351 Telephone No. 202-739-5284 Fax No. 202-739-3001 Check if new: Address <input type="checkbox"/> Telephone No. <input type="checkbox"/> Fax No. <input type="checkbox"/>
Name and address (Note: IRS sends notices and communications to only two representatives.)	CAF No. _____ PTIN _____ Telephone No. _____ Fax No. _____ Check if new: Address <input type="checkbox"/> Telephone No. <input type="checkbox"/> Fax No. <input type="checkbox"/>
Name and address (Note: IRS sends notices and communications to only two representatives.)	CAF No. _____ PTIN _____ Telephone No. _____ Fax No. _____ Check if new: Address <input type="checkbox"/> Telephone No. <input type="checkbox"/> Fax No. <input type="checkbox"/>

to represent the taxpayer before the Internal Revenue Service and perform the following acts:

3 Acts authorized (you are required to complete this line 3). With the exception of the acts described in line 5b, I authorize my representative(s) to receive and inspect my confidential tax information and to perform acts that I can perform with respect to the tax matters described below. For example, my representative(s) shall have the authority to sign any agreements, consents, or similar documents (see instructions for line 5a for authorizing a representative to sign a return).

Description of Matter (Income, Employment, Payroll, Excise, Estate, Gift, Whistleblower, Practitioner Discipline, PLR, FOIA, Civil Penalty, Sec. 4980H Shared Responsibility Payment, etc.) (see instructions)	Tax Form Number (1040, 941, 720, etc.) (if applicable)	Year(s) or Period(s) (if applicable) (see instructions)
Application for Recognition of Exempt Status	1023	n/a

4 Specific use not recorded on Centralized Authorization File (CAF). If the power of attorney is for a specific use not recorded on CAF, check this box. See Line 4. *Specific Use Not Recorded on CAF* in the instructions

5a Additional acts authorized. In addition to the acts listed on line 3 above, I authorize my representative(s) to perform the following acts (see instructions for line 5a for more information):
 Access my IRS records via an Intermediate Service Provider;
 Authorize disclosure to third parties; Substitute or add representative(s); Sign a return;

Other acts authorized: Discuss and update account information with IRS Customer Service.

b Specific acts not authorized. My representative(s) is (are) not authorized to endorse or otherwise negotiate any check (including directing or accepting payment by any means, electronic or otherwise, into an account owned or controlled by the representative(s) or any firm or other entity with whom the representative(s) is (are) associated) issued by the government in respect of a federal tax liability.

List any other specific deletions to the acts otherwise authorized in this power of attorney (see instructions for line 5b): _____

6 Retention/revocation of prior power(s) of attorney. The filing of this power of attorney automatically revokes all earlier power(s) of attorney on file with the Internal Revenue Service for the same matters and years or periods covered by this document. If you do not want to revoke a prior power of attorney, check here **▶**

YOU MUST ATTACH A COPY OF ANY POWER OF ATTORNEY YOU WANT TO REMAIN IN EFFECT.

7 Signature of taxpayer. If a tax matter concerns a year in which a joint return was filed, each spouse must file a separate power of attorney even if they are appointing the same representative(s). If signed by a corporate officer, partner, guardian, tax matters partner, partnership representative (or designated individual, if applicable), executor, receiver, administrator, or trustee on behalf of the taxpayer, I certify that I have the legal authority to execute this form on behalf of the taxpayer.

▶ IF NOT COMPLETED, SIGNED, AND DATED, THE IRS WILL RETURN THIS POWER OF ATTORNEY TO THE TAXPAYER.


Signature

2/22/2023
Date

President
Title (if applicable)

Jennifer Pryce
Print name

Green Community Capital Collaborative, Inc.
Print name of taxpayer from line 1 if other than individual

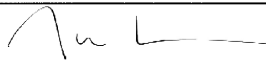

Part II Declaration of Representative

Under penalties of perjury, by my signature below I declare that:

- I am not currently suspended or disbarred from practice, or ineligible for practice, before the Internal Revenue Service;
- I am subject to regulations contained in Circular 230 (31 CFR, Subtitle A, Part 10), as amended, governing practice before the Internal Revenue Service;
- I am authorized to represent the taxpayer identified in Part I for the matter(s) specified there; and
- I am one of the following:
 - a Attorney—a member in good standing of the bar of the highest court of the jurisdiction shown below.
 - b Certified Public Accountant—a holder of an active license to practice as a certified public accountant in the jurisdiction shown below.
 - c Enrolled Agent—enrolled as an agent by the IRS per the requirements of Circular 230.
 - d Officer—a bona fide officer of the taxpayer organization.
 - e Full-Time Employee—a full-time employee of the taxpayer.
 - f Family Member—a member of the taxpayer's immediate family (spouse, parent, child, grandparent, grandchild, step-parent, step-child, brother, or sister).
 - g Enrolled Actuary—enrolled as an actuary by the Joint Board for the Enrollment of Actuaries under 29 U.S.C. 1242 (the authority to practice before the IRS is limited by section 10.3(d) of Circular 230).
 - h Unenrolled Return Preparer—Authority to practice before the IRS is limited. An unenrolled return preparer may represent, provided the preparer (1) prepared and signed the return or claim for refund (or prepared if there is no signature space on the form); (2) was eligible to sign the return or claim for refund; (3) has a valid PTIN; and (4) possesses the required Annual Filing Season Program Record of Completion(s). See **Special Rules and Requirements for Unenrolled Return Preparers in the instructions for additional information.**
 - k Qualifying Student—receives permission to represent taxpayers before the IRS by virtue of his/her status as a law, business, or accounting student working in an LITC or STCP. See instructions for Part II for additional information and requirements.
 - r Enrolled Retirement Plan Agent—enrolled as a retirement plan agent under the requirements of Circular 230 (the authority to practice before the Internal Revenue Service is limited by section 10.3(e)).

▶ IF THIS DECLARATION OF REPRESENTATIVE IS NOT COMPLETED, SIGNED, AND DATED, THE IRS WILL RETURN THE POWER OF ATTORNEY. REPRESENTATIVES MUST SIGN IN THE ORDER LISTED IN PART I, LINE 2.

Note: For designations d–f, enter your title, position, or relationship to the taxpayer in the "Licensing jurisdiction" column.

Designation— Insert above letter (a–r).	Licensing jurisdiction (State) or other licensing authority (if applicable)	Bar, license, certification, registration, or enrollment number (if applicable)	Signature	Date
a	NY, DC	2830297		2-27-2023
a	VA, DC	89531, 1531332		2-27-2023

ATTACHMENT A**Part IV Your Activities**

1 Describe completely and in detail your past, present, and planned activities. Do not refer to or repeat the purposes in your organizing document. For each past, present, or planned activity, include information that answers the following questions:

- a. What is the activity?**
- b. Who conducts the activity?**
- c. Where is the activity conducted?**
- d. What percentage of your total time is allocated to the activity?**
- e. How is the activity funded (for example, donations, fees, etc.) and what percentage of your overall expenses is allocated to this activity?**
- f. How does the activity further your exempt purposes?**

Green Community Capital Collaborative, Inc. (the “Organization”) is a Delaware non-profit corporation formed for charitable, educational, and scientific purposes. The Organization’s principal focus is on mitigating the adverse effects of climate change and increasing the adoption of solutions to help significantly lower greenhouse gas emissions. Specifically, the Organization plans to enable low-income and disadvantaged communities to deploy or benefit from zero-emission technologies.

The current climate crisis is one of the most critical issues facing humanity and poses the risk of significant environmental, social, and economic disruptions around the globe. According to scientific consensus, human activities (mainly those that result in greenhouse-gas emissions) are the dominant cause of rapid global warming that is destabilizing our natural environment and putting global health and security at major risk.¹

Congress recently passed the Inflation Reduction Act of 2022 (the “Act”) aimed at addressing these critical issues. Among other ambitious goals, the Act is designed to reduce harmful greenhouse gas emissions by about 1 gigaton, which is a billion metric tons, by 2030 – 10 times more climate impact than any other single piece of legislation ever enacted.² According to the White House’s experts, these clean energy and pollution reduction efforts will avoid up to 3,900 premature deaths and up to 100,000 asthma attacks annually by 2030.³ As part of its efforts to meet these ambitious goals, the Act established the Greenhouse Gas Reduction Fund, which will deploy \$27 billion in competitive grants to mobilize financing for clean energy and climate projects that reduce or avoid greenhouse gas emissions, especially in disadvantaged communities. As authorized under the Act, the Environmental Protection Agency will allocate \$20 billion of the funding to a nonprofit organization that will use the funding to make loans and grants to support these purposes.

The Organization was formed to carry out the purposes of the Act by conducting lending and grantmaking activities under the Greenhouse Gas Reduction Fund. It will bring together and leverage the expertise of section 501(c)(3) organizations like Calvert Impact Capital, Inc. and other partner organizations focused on community development financing and climate/environmental sciences in support of its charitable lending and grantmaking program. As described in the Act, the Organization will provide grants, loans, or

¹ *Scientific Consensus: Earth’s Climate is Warming*, NASA, <https://climate.nasa.gov/scientific-consensus/>.

² *By the Numbers: The Inflation Reduction Act*, The White House (Aug. 15, 2022), <https://www.whitehouse.gov/briefing-room/statements-releases/2022/08/15/by-the-numbers-the-inflation-reduction-act/>.

³ *Id.*

other forms of financial assistance, as well as technical assistance, to enable low income and disadvantaged communities to deploy or benefit from zero-emission technologies, including distributed technologies on residential rooftops, and to carry out other greenhouse gas emission reduction activities. In accordance with the requirements of the Act, the Organization will use any federal grant funds provided under the under the Greenhouse Gas Reduction Fund to a) provide financial assistance to qualified projects at the national, regional, State, and local levels; b) prioritize investment in qualified projects that would otherwise lack access to financing; and c) retain, manage, recycle, and monetize all repayments and other revenue received from fees, interest, repaid loans, and all other types of financial assistance provided using grant funds to ensure continued operability.⁴ In addition, the Organization will provide funding and technical assistance to establish new or support existing public, quasi-public, not-for-profit, or nonprofit entities that provide financial assistance to qualified projects at the State, local, territorial, or Tribal level or in the District of Columbia, including community- and low-income-focused lenders and capital providers.

In support of its mission, the Organization will encourage, accept, and administer gifts and grants from private persons, charitable organizations, and state and local government agencies. The Organization also plans to apply during the competitive bidding process for federal funding through the Greenhouse Gas Reduction Fund to support its activities.

It is difficult at this time to anticipate how much Organization resources and time will be expended on each discrete activity described in this application, but 100% of the organization's time and resources will be spent on its exempt activities.

⁴ Section 60103(b) of the Inflation Reduction Act.

ATTACHMENT B

Part VI	Financial Data
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Line 23: Any Expense Not Otherwise Classified	Current tax year	4 prior tax years or 2 succeeding tax years			
	01/01/2023 – 12/31/2023	10/31/2022 – 12/31/2022	01/01/2024 – 12/31/2024	01/01/2025 – 12/31/2025	
Consultants	\$80,000	\$0	\$500,000	\$500,000	
IT systems set-up	\$0	\$0	\$350,000	\$350,000	
marketing and communications	\$20,000	\$0	\$100,000	\$100,000	
travel expenses	\$0	\$0	\$50,000	\$50,000	
Total	\$100,000	\$0	\$1,000,000	\$1,000,000	

Part VIII Effective Date

In general, a determination letter recognizing exemption of an organization described in section 501(c)(3) is effective as of the date of formation of an organization if: (1) its purposes and activities prior to the date of the determination letter have been consistent with the requirements for exemption; and (2) it has filed an application for recognition of exemption within 27 months from the end of the month in which it was organized.

1 Are you submitting this application within 27 months of the end of the month in which you were legally formed? Yes No

If "No," complete Schedule E.

Part IX Annual Filing Requirements

If you fail to file a required information return or notice for three consecutive years, your exempt status will be automatically revoked.

1 Certain organizations are not required to file annual information returns or notices (Form 990, Form 990-EZ, or Form 990-N, e-Postcard). If you are granted tax-exemption, are you claiming to be excused from filing Form 990, Form 990-EZ, or Form 990-N? Yes No

If "Yes," are you claiming you are excused from filing because you are:

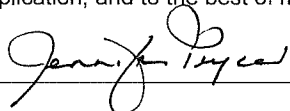
- A church or association of churches
- An integrated auxiliary (such as a men's or women's organization, religious school, mission society, or religious group)
- A church-affiliated organization (other than a section 509(a)(3) organization) that is exclusively engaged in managing funds or maintaining retirement programs and is described in Revenue Procedure 96-10, 1996-1 C.B. 577
- A school below college level affiliated with a church or operated by a religious order
- A mission society (other than a section 509(a)(3) supporting organization) sponsored by, or affiliated with, one or more churches or church denominations, if more than half of the society's activities are conducted in, or directed at, persons in foreign countries
- An affiliate of a governmental unit that meets the requirements of Revenue Procedure 95-48, 1995-2 C.B. 418 (other than a section 509(a)(3) supporting organization)
- Other (describe)

Part X Signature

I declare under the penalties of perjury that I am authorized to sign this application on behalf of the above organization and that I have examined this application, and to the best of my knowledge it is true, correct, and complete.

Jennifer Pryce

 (Type name of signer)



DIRECTOR & PRESIDENT

 (Type title or authority of signer)

02/22/2023

 (Date)

EXPEDITE REQUEST

Green Community Capital Collaborative (the “Organization”) requests expedited processing of its Form 1023 pursuant to the instructions to the Form 1023. As discussed more fully in the narrative description of the Organization’s activities, the Organization was formed to carry out the purposes of the Greenhouse Gas Reduction Fund as established under the Inflation Reduction Act (the “Act”) by providing grants, loans, or other forms of financial assistance, as well as technical assistance to enable low-income and disadvantaged communities to deploy or benefit from zero-emission technologies.

As provided in the instructions, circumstances generally warranting expedited processing include when a grant to the applicant is pending and failure to secure the grant may have an adverse impact on the organization’s ability to continue operations. The Organization intends to apply for a federal grant provided under the Act. The Organization understands that the application process will begin in early summer 2023, and its eligibility for funding is contingent on the Organization receiving its determination letter by that time. The Organization plans to use this funding to provide assistance to low-income and disadvantaged communities and will be unable to continue its operations without this funding.

Because the Organization’s purpose is to provide grants, loans, or other forms of financial assistance, as well as technical assistance to enable low-income and disadvantaged communities to deploy or benefit from zero-emission technologies, and because the organization will need to apply for that federal grant funding by early summer 2023, **expedited processing is warranted.**