Conflict of Interest Policy

Source of Authority: UNC Code Section 600.2.5.2 (H)
Required Elements of University-Associated Entity Relationship

High standards, ethical behavior, personal integrity, and impartiality are inherent to the reputation and ultimate success of the University of North Carolina at Wilmington Endowment Board. In keeping with these norms, officers, board members, and staff must refrain from engaging in any behavior that might be construed as placing the individual interest above the interest of the University of North Carolina at Wilmington or in conflict with the mission, goals, and fundamental purpose of the Endowment Board.

As a public institution, our ethical conduct must be above reproach. Not only must we avoid an actual conflict of interest but also the appearance of, perception of, or potential for conflict of interest. As a person associated with the University of North Carolina at Wilmington Endowment Board, it is your duty to disclose, on an annual basis or as a situation arises, other obligations that might prevent you from acting in the best interest of the University of North Carolina at Wilmington and then remove yourself from discussions, actions, votes or other activities in relation to the conflict.

The University of North Carolina at Wilmington Endowment Board Conflict of Interest Policy applies to everyone involved in the Endowment Board, including:

- Board members
- All committee members and sub-committee members
- All university administrators, faculty and staff members involved in the Endowment Board

Should an issue arise that could be a potential conflict of interest, you have a duty to the University to notify the Vice Chancellor for Business Affairs at the University of North Carolina at Wilmington. Appropriate members of the University and the University of North Carolina at Wilmington Endowment Board will make a determination related to the conflict or potential conflict.

Examples of potential conflicts:

- Serving on boards of organizations that are in direct programmatic competition with Endowment Board or the University;
- Using the equipment or other resources of the Endowment Board to secure outside personal gains;
- Citing participation in the Endowment Board to advance personal, political, or profit-motivated activities;
- Marketing services or products to the Endowment Board on a non-competitive basis;
- Disclosing to outside parties any plans and other information on the Endowment Board when such information is not readily available to the public;
- Leveraging involvement with the Endowment Board to secure favorable rates, discounts, or other preferential treatment; and
- Profiting materially through counseling or other instructional activities predicated on skills and knowledge gained through association with the Endowment Board.
The Endowment Board acknowledges that the appearance of conflict of interest does not always imply actual conflict. Policy requires that all potential conflicts of interest shall be presented in writing to the Vice Chancellor for Business Affairs at the University of North Carolina at Wilmington for the purpose of review and possible remedial action.

Once the Endowment Board has made its determination and presented alternatives, you may be asked to:

- Abstain from voting on the action
- Remove yourself from any discussion related to the conflict
- Refrain from discussing the issue with other co-workers, administrators or board/committee members so as not to influence their actions
- Consider other actions, depending on the situation

The attached Conflict of Interest Disclosure Form must be completed annually by all affected parties with the Endowment Board. In addition, it must be provided to all new board members, administrators, faculty, and staff at the beginning of their service to the Endowment Board.

Please complete the attached disclosure form and return it to Vice Chancellor for Business Affairs, University of North Carolina at Wilmington prior to the established deadline.
University of North Carolina at Wilmington Endowment Board
Conflict of Interest Disclosure Form

Have you or any related party (direct relative or business partner, etc.) of yours had any interest, direct or indirect, in any of the following transactions since July 1, 2019 with The Endowment Board?

<table>
<thead>
<tr>
<th>YES</th>
<th>NO</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Sale, purchase, exchange, or leasing of property?</td>
<td></td>
</tr>
<tr>
<td>• Receiving or furnishing of goods, services, or facilities?</td>
<td></td>
</tr>
<tr>
<td>• Transfer or receipt of compensation, fringe benefits, or income or assets?</td>
<td></td>
</tr>
<tr>
<td>• Maintenance of bank balances as compensating balances for the benefit of another?</td>
<td></td>
</tr>
<tr>
<td>• Other transactions?</td>
<td></td>
</tr>
</tbody>
</table>

Comments:

Do you or any related party (direct relative or business partner) of yours have any interest, direct or indirect, in any of the following pending or incomplete transactions with The Endowment Board?

<table>
<thead>
<tr>
<th>YES</th>
<th>NO</th>
</tr>
</thead>
<tbody>
<tr>
<td>• Sale, purchase, exchange, or leasing of property?</td>
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<tr>
<td>• Other transactions?</td>
<td></td>
</tr>
</tbody>
</table>

Comments:

1) Have you or any related party of yours been indebted to or had a receivable from The Endowment Board at any time since July 1, 2019? Please exclude amounts due for ordinary travel and expense advances.

Comments:

2) Do you know of any related party or any other person or entity that has misappropriated assets or committed other forms of fraud against the organization?

Comments:

3) Do you receive compensation from any other organization, whether tax-exempt or taxable, that is related to The Endowment Board through common supervision or common control?

Comments:

4) Serve as an officer, director, trustee, key employee, or partner of an entity (or shareholder of a professional corporation) doing business with The Endowment Board?

Comments:

The answers to the foregoing questions are correctly stated to the best of my knowledge and belief.

Name: ________________________________

Title: ________________________________

Date: ________________________________