

Amherst College
Conflict of Interest Disclosure Statement

NAME: _____

See the Attachment for the definitions of various terms used in this Disclosure Statement.

1. General Compliance

Are you familiar with, have you read, and do you agree to abide by the terms of the Conflict of Interest Policy adopted by the Board of Trustees?

_____ Yes
_____ No

2. Other Affiliations

At any time during the twelve months ended June 30, 2015, did you serve as a board member, for any other entity (regardless of profit or not-for-profit status) or as an employee or consultant of any other institution of higher education or affiliate or other not-for-profit organization?

_____ Yes (please describe below)
_____ No

Name of Organization	Position Held
_____	_____
_____	_____
_____	_____
_____	_____

3. Family Relationships

At any time during the twelve months ended June 30, 2015, was any officer, trustee or **Key Employee** of the College a **Family Member** of yours?

_____ Yes (please describe below)
_____ No

Name of Individual	Position Held	Specific Family Relationship
_____	_____	_____
_____	_____	_____
_____	_____	_____
_____	_____	_____

4. Business Relationships

At any time during the twelve months ended June 30, 2015, did you have any **Business Relationship** with any officer, trustee or **Key Employee** of the College?

_____ Yes (please describe below)
_____ No

Name of Individual	Description of Business Relationship
_____	_____
_____	_____
_____	_____
_____	_____

5. Gifts

The solicitation or acceptance of any gift, favor or service that might reasonably influence an individual in the discharge of his or her duties could give rise to a conflict or appearance of a conflict. Gifts of cash, of any value, should be avoided. During the twelve months ended June 30, 2015, have you or, to the best of your knowledge, any **Family Member** received a gift(s) due to your relationship as an employee, officer or board member of the College that had a cumulative value greater than \$250?

_____ Yes (please describe below)
_____ No

Gift	Value	Grantor

6. Financial Transactions

During the twelve month period ended June 30, 2015, have (a) you or (b) to the best of your knowledge, a **Family Member** or (c) to the best of your knowledge, an entity in which you and/or a **Family Member**, directly or indirectly, have an **Interest** been involved in any of the following types of transactions with the College or a **Related Organization** of the College:

(1) A transaction in which the College or a **Related Organization** of the College directly or indirectly provided to or for the use of such person or entity an economic benefit whose value exceeded the value of the consideration received in exchange for the benefit? ___ Yes ___ No

(2) A loan (including a salary advance or other advance or receivable) that was outstanding as of June 30, 2015? ___ Yes ___ No

(3) A grant (such as a scholarship, fellowship, internship, prize or award, or the gift portion of a part-gift, part-sale transaction) or other assistance (including provision of goods, services or use of facilities)? ___ Yes ___ No

(4) A business transaction (including joint ventures, sales, leases, licenses and performance of services), either directly or through an affiliation with another organization, exceeding any one of the following thresholds: (a) total payments during the twelve month period ended June 30, 2015 exceeding \$100,000; or (b) all payments during the twelve month period ended June 30, 2015 from a single transaction exceeding the greater of \$10,000 or 1% of the organization's total revenues; or (c) compensation payment to a **Family Member** exceeding \$10,000?
___ Yes ___ No

(5) Any other financial transaction, consummated or pending? Consider relationships the College has with commercial or investment banks, investment advisors, managers or other investment professionals, insurance agents or carriers, or any supplier providing goods or services to the College. To assist your disclosure, attached is a list of companies that had transactions (greater than \$50,000 in value) with the College in the prior year and a list of investments held at the end of the fiscal year. ___ Yes ___ No

If you answered "Yes" to any of the above questions, please describe below, including where applicable (i.e. investment fund, vendor, etc.) whether your ownership or the **Family Member's** ownership of the entity involved with such transaction exceeded 5% at any time during the fiscal year:

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7.

Based on the Conflict of Interest Policy of the College, are there other activities that you or, to the best of your knowledge, a **Family Member** are engaged in that might be regarded as a conflict of interest?

_____ Yes (please describe below)
_____ No

Except as noted, neither I nor, to the best of my knowledge, any **Family Member**, has any interest or is engaged in any activity which might be interpreted as a violation of the policy statement.

Signature

Printed Name

Office or Position

Date

Attachment to Disclosure Statement

Definitions

Business Relationship. Business relationships between two persons, including the following:

- 1) A person is employed by the other in a sole proprietorship or by an organization as to which the other person is a trustee, director, officer, **key employee** or greater than 35% owner;
- 2) A person is transacting business (other than in the ordinary course of business) with another person, directly or indirectly, with an aggregate value in excess of \$10,000;
- 3) The two persons are each a director, trustee, officer or greater than 10% owner in the same business or investment entity.

Ownership is measured by stock ownership (either voting power or value) of a corporation, profits or capital interest in a partnership or limited liability company, membership interest in a nonprofit organization, or beneficial interest in a trust. Ownership includes indirect ownership (e.g., ownership in an entity that has ownership in the entity in question); there may be ownership through multiple tiers of entities.

Family Member. A person's brothers and sisters (including half siblings and step-siblings), children, grandchildren and great grandchildren (including step-children, step-grandchildren, and step-great grandchildren), ancestors (parents, grandparents, etc., including step-parents and step-grandparents) and spouses (of the person and any person in the foregoing categories). Family Members also include siblings, descendants and ancestors by adoption.

Interest. Direct or beneficial ownership of five or more percent of the corporation, partnership, joint venture, or other entity, or a role as a trustee, director, officer or employee of the entity, or any other relationship that either provides material control over the entity or creates a material personal stake in the entity's profits.

Key Employee. An employee of the organization (other than an officer, director, or trustee) who (a) received reportable compensation from the organization and all **Related Organizations** in excess of \$150,000 during the most recent calendar year; and (b) has responsibilities, power or influence over the organization as whole that is similar to those of officers, directors or trustees, or manages a discrete segment or activity of the organization that represents 10% or more of the organization's activities, assets, income or expenses, or has or shares authority to control or determine 10% or more of the organization's capital expenditures, operating budget or employee compensation; and (c) is one of the top twenty employees with the highest reportable compensation from the organization and **Related Organizations** for the most recent calendar year.

Related Organization. An organization which controls, is controlled by or under common control with the applicable organization; or a supporting organization (within the meaning of Section 509(a)(3) of the Internal Revenue Code) of the applicable organization.