## COLUMBIA COLLEGE CONFLICT OF INTEREST ANNUAL DISCLOSURE QUESTIONNAIRE Disclosure Period:

This Conflict of Interest Annual Disclosure Questionnaire must be completed annually by every Covered Person of the College, defined below, and will be provided to the Board.

"Covered Person" is defined as any employee (including faculty and staff), Trustee, officer, substantial contributor (a person who has given more than \$5,000 during a single tax year) to the College, or member of a committee with governing Board delegated powers, who has a direct or indirect Interest (as defined below). A Covered Person also includes a family member of the above named individuals including a spouse, brothers or sisters, spouses of brothers and sisters, children, grandchildren, great grandchildren, ancestors and spouses of children, grandchildren and great grandchildren. This definition shall be applied broadly.

A Covered Person has an "Interest" with respect to a contract, transaction or arrangement to which the College is (or would be, if approved) a party if the Covered Person has, directly or indirectly, through personal, business, investment, or family:

- a. An ownership or investment interest in any entity involved in such contract, transaction or arrangement;
- b. A compensation arrangement with any entity or individual involved in such a contract, transaction or arrangement;
- c. A potential ownership or investment interest in, or compensation arrangement with, any entity or individual with which the College is negotiating such contract, transaction or arrangement; or
- d. A fiduciary position (e.g., member, officer, director, committee member) with respect to an entity involved in such contract, transaction or arrangement, but only to the extent that such position involves a material financial interest of, or benefit to, such person.

For purposes of this section, compensation includes direct and indirect remuneration, consulting fees, board or advisory committee fees, honoraria, as well as gifts or favors that are substantial in nature.

The questions below will help identify matters which may be of interest in planning College activities or which may create, or be thought to create, Conflicts of Interest for you in carrying out your fiduciary responsibilities to the College.

1. List the names of all organizations or entities (including fictitious registrations) in which you or a family member possess an Interest, directly or indirectly, (e.g. employment, ownership, investment, management responsibility, Board membership, etc.) regardless of whether these organizations and/or entities supply or provide goods/services to the College, have a financial relationship with the College or otherwise transact business with the College. Ownership/investment interests need only be disclosed if your ownership/investment interest is 5% or greater. The College will compare the information you provide to our accounting records to ensure we capture all potential transactions.

2. To the best of your knowledge, are you or any family member employed by, or possess, directly or indirectly, any Interest (e.g. employment, ownership, investment, management responsibility, board membership, etc.) in any organization or entity that provides any product or service which is in competition with the College? If yes, please list the name of each such organization and its relationship to you or your family member.

 $\Box$ Yes  $\Box$ No

- 3. Do you or a family member have an Interest in any contract, transaction or arrangement in which the College is a party, or would be a party if the contract, transaction or arrangement is approved, and you, directly or indirectly, through a business, investment or family member, have:
  - i. An ownership or investment interest in any entity involved in such contract, transaction or arrangement;
  - ii. A compensation arrangement with an individual or entity involved in such a contract, transaction or arrangement;
  - iii. A potential ownership or investment interest in, or compensation arrangement with, an individual or entity with which the College is negotiating such contract, transaction or arrangement; or
  - iv. A fiduciary position (e.g., member, officer, director, trustee, committee member) with respect to an entity involved in such contract, transaction or arrangement, but only to the extent that such position involves a material financial interest of, or benefit to, such person.
  - $\Box$ Yes  $\Box$ No If yes, please provide a description below.
- 4. Did you or a family member receive grants or other financial assistance, including provision of goods, services, or use of facilities from the College? This includes scholarships, fellowships, internships, prizes, awards, etc. If yes, please describe the grant or other assistance received and the dollar amount

□Yes □No

5. Do you have any loans to or from Columbia College? If yes, please describe the loan arrangement and the dollar amount.

□Yes □No

6. Are you aware of any excess benefit transaction(s) to report? An excess benefit transaction is where the College directly or indirectly provided an economic benefit where the value of the benefit exceeds the value of the consideration received by the College. If yes, please describe the excess benefit transaction and the dollar amount

□Yes □No

7. Do you have a family member employed by the College? If yes, please identify the individual(s) and the relationship.

□Yes □No

8. Do you have a family member who is a student at the College? If yes, please identify the individual(s) and the relationship.

□Yes □No

By signing below I hereby certify to the best of my knowledge that my responses to the above questions are true, correct and complete. I have received a copy of the Columbia College Conflicts of Interest Policy, have read and understand the Policy, and understand the Policy also applies to Committees with Board delegated authority. I agree to comply with the Policy and to report to the College any change to my disclosures on this document or if I become aware of any actual or potential conflict of interest or the appearance of a conflict of interest. I understand that Columbia College is a charitable organization and that in order to maintain its federal tax exemption it must engage primarily in activities which accomplish one or more of its tax-exempt purposes

Date: \_\_\_\_\_

Signature

Name (please print or type)

Title (please print or type)

Please return via U.S. Mail to Allen Schelp, Controller, Columbia College, 1001 Rogers Street, Columbia, MO 65216 or via email to <u>adschelp@ccis.edu</u>.