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Policy number: 01012015

Effective date: January 1, 2015

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Owner: Special Assistant to the President

Summary: The purpose of this policy is to establish the procedures applicable to the identification and resolution of conflicts of interest in the context of financial transactions or arrangements entered into by UoPeople.

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The purpose of this Policy on Financial Transactions is to establish the procedures applicable to the identification and resolution of conflicts of interest in the context of transactions or arrangements entered into by University of the People ("UoPeople") where an Interested Person may have a Financial Interest in an individual or entity with which UoPeople is negotiating a transaction or arrangement.

This policy is intended to supplement but not replace any applicable state laws governing conflicts of interest applicable to nonprofit and charitable corporations. It supplements the University's Policy on Conflicts of Interest.



the investment fund.

- 1) An Interested Person may make a factual presentation at the Board meeting, but after such

the names of the persons who disclosed or otherwise were found to have a Financial Interest in connection with an actual or possible conflict of interest or apparent conflict of interest, the nature of the Financial Interest, any action taken to determine whether a conflict of interest was