

**CONFLICT OF INTEREST POLICY**  
**PROVIDENCE COLLEGE**

Trustees, non-Trustee members of Board Committees<sup>1</sup>, Officers, and Selected Employees<sup>2</sup> of Providence College shall avoid placing themselves in positions in which there may be a conflict between their personal interest and their duties to the College. It is not practical to attempt to define every instance that may give rise to conflicts of interest. In general, Trustees, Officers, and Selected Employees should not participate directly or indirectly in any transaction involving Providence College which would result in personal benefit at the expense of the interest of Providence College, nor should any Trustee, Officer, or Selected Employee, or any member of their families, accept gifts, services, or other favors under circumstances from which it might be inferred that such actions were intended to influence their performance of duties for Providence College.

**Disclosure**

It is recognized that there may be transactions with Providence College in which Trustees, Officers, and Selected Employees have personal interests but which are, nevertheless, beneficial to Providence College. To place the responsibility for determining whether or not Providence College should enter into transactions in which conflicts of interest may exist, each proposed transaction in which it is known to management that a Trustee, Officer, or Selected Employee may have a conflicting interest shall be submitted to the President to be reviewed with the Board of Trustees, or the Executive Committee for approval or for such action as the Board of Trustees, or Executive Committee may determine.

**Reporting**

If a potential conflicting interest of a Trustee, Officer, or Selected Employee involving Providence College is not known to the President, it shall be the responsibility of such Trustee, Officer, or Selected Employee to make it known to the President, in writing, to provide the President the opportunity to present proposed transactions to the Board of Trustees or the Executive Committee for such action as the Board of Trustees, or the Executive Committee may determine.

**Definition**

Transactions include arrangements, agreements, purchases, sales, and other business in which Providence College is involved. In addition to direct personal interest, a person shall be

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<sup>1</sup> Including all non-Trustees who are appointed and serve on the various sub-committees of the Board of Trustees.

<sup>2</sup> "Selected Employees" are defined as including but not limited to the: Executive Vice President, Vice Presidents, Associate Vice Presidents, Assistant Vice Presidents, Director of Purchasing, Director of Physical Plant, Controller, Director of Admissions, Director of Financial Aid, Athletic Director, Executive Secretary to the President, Physical Plant Managers, Coaches and Assistant Coaches and such other employees that may be added or deleted from time to time at the discretion of the College.

considered as having a personal interest if a member of one's family will benefit, or if any business enterprise in which one has a substantial interest, or if any business enterprise in which any member of one's family has a substantial interest. Any such transactions must be submitted to the President for review with the Board of Trustees, or the Executive Committee for approval or for such other action as the Board of Trustees, or Executive Committee may determine.

### **Record Keeping**

The General Counsel of the College shall maintain a file of information disclosed by Trustees, Officers, and Selected Employees. The file of information shall be amended annually, as affiliations which may give rise to possible conflicts of interest change, upon such a date as the Board of Trustees shall determine.

Each Trustee, Officer, or Selected Employee shall sign a conflict of interest statement in accordance with the statement attached hereto. All dissenting votes and abstentions from voting shall be duly noted in the minutes of all meetings of the Board and its committees.

### **Resolution**

Issues arising under the application of this policy shall be resolved by the Board of Trustees or the Executive Committee.

## **GIFTS AND GRATUITIES POLICY ADDENDUM TO THE CONFLICT OF INTEREST POLICY**

### **Introduction**

It is essential that the professional duties, responsibilities, and work activity conducted by the employees of Providence College incorporate consistently high ethical standards that reflect our Mission and maintain a high degree of trust.

College employees are to avoid undue influence in the performance of their duties. This includes decisions made with regard to purchasing goods, commodities, or services; awarding contracts; and selecting vendors and contractors. This would also include decisions made with regard to admissions, academic programs, and the awarding of grants and scholarships.

### **Policy**

The purpose of this policy (“policy”) is to ensure that employees of the College do not conduct business with customers or vendors on the basis of gifts or favors anticipated, promised, or received. No employee shall receive any improper payment or gratuity from any business enterprise or individual that is a supplier, customer, or competitor of the College. College employees may not accept or solicit any gift of any kind (except as otherwise provided herein) from any person or entity who: (1) is seeking official action by the employee or College; (2) does business or seeks to do business with the College; (3) conducts activities regulated by the College; or, (4) has interests that may be substantially affected by the performance or non-performance of the employee or College. This prohibition includes accepting a gift, favor, service, or privilege, defined below, from an existing or potential customer or supplier that is of more than nominal value, and that exceeds the level of business courtesies extended in accordance with accepted ethical business standards, thereby creating a conflict of interest. If an employee has any questions regarding the appropriateness of a gift, gratuity, or invitation, he/she should address the concern with his/her supervisor, or the Vice President and General Counsel.

### **Definition**

A “business gift and/or entertainment” is anything of value received as the result of a business relationship and for which the recipient does not pay fair market value. A gift and/or entertainment can be in any form. Food, theater or sporting event tickets, discount or “all expense paid” trips, promotional items and golf greens fees, to name a few, can all be considered business gifts and/or entertainment.

Employees are prohibited from receiving business gifts and entertainments during any given calendar year with a cumulative value of more than \$200.00 from any individual or business as defined herein.

### **Guidelines**

It is understood that there are times when meals, beverages, golf outings, tickets to

sporting or cultural events and other social events are helpful in conducting College business. Entertainment of this nature, however, is not to be encouraged or used as a prerequisite for doing business with the company, but may be accepted or extended by employees when appropriate for achieving business objectives. Gifts or gratuities should not be accepted if they could, or if they give the appearance that they could: 1) be reasonably considered to improperly influence the College's business relationship with, or create an obligation to, a customer, vendor, contractor, or individual; 2) violate laws, regulations or our Conflict of Interest Policy; 3) constitute an unfair business inducement; or, 4) cause embarrassment or negative impact to the College. This gift ban also applies to and includes the spouse of and other immediate family of the employee.

This Policy allows for the following specific exceptions to this ban on gifts and no other exceptions:

Opportunities, benefits and services available to the general public on the same terms and conditions;

Anything for which the employee paid market value;

Educational materials;

Travel expenses for a meeting to discuss College business;

A gift from a relative;

Anything provided on the basis of personal friendship (unless the gift was provided because of the College employment of the employee and not because of the friendship);

Intra-College or inter-College gifts (i.e. gifts between College or College employees);

Bequests, inheritances, and other transfers at death.

The General Counsel's Office provides guidance interpreting this Policy. Nothing in this Policy exempts College employees from submitting on an annual basis a completed Conflict of Interest Form to the General Counsel as required by the College's Conflict of Interest Policy. The Office of the General Counsel is located in Harkins Hall room 201 and the phone number is 865-2574.

## Vendors Paid Over \$100k in CY 24

**NOTE: ALL relationships with Vendors must be disclosed on the Conflict of Interest form regardless of whether they are on this list.**

AMP		Eagle Rivet Roof Services Corp.
ATR/Treehouse		Electrical Wholesalers Inc
Aborn Window Shade Manufacturing Company		Ellucian Company LLC
Academy Express LLC		ePlus Technology Inc.
Action Contracting Services Inc		Emerson Swan Inc
Aero Mechanical, Inc.		Exquisite Events
Affinaquest Technologies, LLC		Fairfield University
Air Planning LLC		Farrar & Associates, Inc.
Amazon Capital Services, Inc.		Ford Credit
American Institutes for Research		Fuss & O'Neill Incorporated
American University		Futetour, Lda
Apple Inc		GKT Refrigeration Inc
Arcadia University		GPS-Gil's Property Services LLC
Arden Engineering Constructors, LLC		Genesis Jet Brokerage, LLC
Arthur J. Gallagher Risk Management Services, LLC		GiveCampus, Inc.
Atlantic Elevator South Company Inc		GovConnection Inc
Avelo Airlines, Inc.		<a href="http://Governmentjobs.com">Governmentjobs.com</a> , Inc.
Axion Specialty Contracting LLC		Grainger
BCG Connect, LLC		HELIN Inc
Barnes & Noble College Booksellers, LLC		Hampton University
Bartlett Tree Experts		High Output Inc
Bauer Hockey, LLC		Home Grown Music, Inc.
Benefit Trust Care and Support		Hudl
Big East Conference Inc		Huron Consulting Services LLC
Bill Lizotte Architectural Glass & Aluminum, Inc.		IES Abroad
Blackhorse Farm Solar, LLC		Institute for Study Abroad
Blue Cross & Blue Shield		Instructure, Inc.
Boston University		J & B Communications Inc
Branch Floor Covering		J.S. McCarthy Printers
Breeze Airways		J5 Inc
Cambridge Associates		Jacavone Construction Corp
CBIZ Insurance Services, Inc.		Jennifer J. Nadeau M.D., LLC
CIEE, Inc.		Joseph Tavone Incorporated
Caputo and Wick Ltd		Jostens Inc
City of Providence		KPMG LLP
Coast to Coast		Korel Controls Inc
Coca-Cola Beverages Northeast, Inc.		LRF Inc.
Community Initiatives		Lane Press
Cox Communications		Lincoln Life Assurance Company of Boston
Creative Office Resources		MB Signs and Graphics
CrowdSync Technology LLC		Macrolease Corporation
Cultural Experiences Abroad		Marshall Food Equipment Service, Inc.
DATTCO		Millonzi Fine Catering
DGI Communications, LLC		NPS LLC
DIS		NRG Business Marketing, LLC
Dimeo Construction Company		Naismith Memorial Basketball Hall of Fame
Dominican Sisters of St. Cecilia Congregation		Nalco Water

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Narragansett Bay Commission		Shield Casework, LLC
New England Star Remodeling & nextSource, Inc.		Site Tech Corporation
<a href="http://nextSource.com">nextSource, Inc.</a>		Sodexo Incorporated & Affiliates
<a href="http://Niche.com">Niche.com</a> , Inc.		Solar Breakers, LLC.
OSHEAN, Inc.		Sterling Engineering Co Inc
OVG Global Partnerships, LLC		Sun Life Assurance Company of Canada
One Diversified, LLC		Superior Lawn Maintenance Inc.
Optiv Security Inc		Tally's
Oracle America Inc		TeamDynamix Solutions LLC
PIDC Construction, LLC		Teamworks Innovations, Inc.
Paciolan LLC		The Catered Affair
Pass Charters		The College Board
Peak Event Services Inc.		The Royal Flush Plumbing Inc
Pilgrim Title Insurance Company		The S/L/A/M Collaborative, Inc.
Power Solutions, LLC		The Skyline Group, Inc.
Prime Time Sports Incorporated		Thomas-Young Associates Inc
Priory of St. Thomas Aquinas		Trane U.S. Inc.
Providence Sportservice		Transact Campus Inc.
Providence Water		Two Friends Music, Inc.
Quality Rental Center		Two Rivers Travel
R.J. Forbes Painting Contractor, Inc.		UG2 LLC
RC Metalworks		University of St.Thomas
RIHEBC		University of Wisconsin
Rhode Island Energy		Usentra Security Services
Riptide Technologies		Valet Park of America
Roadrunner Modern Waste + Recycling		WB Mason Co Inc
Robin Hollow Solar LLC		Wannamoisett Country Club
Rossi Electric Company, LLC		Waste Management of RI
S. W. Cole Engineering, Inc.		Wellfleet Group
SHI International Corp		Western Dominican Province
SMMA		Wilkinson Associates Inc
SRSD Online Partners		Witt/Kieffer
<a href="http://Salesforce.com">Salesforce.com</a> , Inc.		Xerox Corporation
Sallie Mae Servicing Corporation		

## List of Investments FY 25

Accolade Partners F, L.P. (Zeev VIII SPV)	King Street Capital, Ltd.
Accolade Partners Growth I, L.P.	Kline Hill Partners Core Offshore Fund V LP
Accolade Partners VIII-G, L.P.	Kline Hill Partners Offshore Feeder Fund V LP
Adage Capital Partners, L.P.	Kline Hill Partners Offshore Fund III LP
Altimeter Growth Partners Fund VI, L.P.	Kline Hill Partners Offshore Fund IV LP
Altimeter Offshore Ltd.	Kline Hill Partners Opportunity Offshore Fund IV LP
Altimeter Venture Partners Fund VII, L.P.	Kline Hill Partners Opportunity Offshore Fund III LP
Arrowstreet Capital Global All Country Alpha Extension Fund (Cayman) Limited	Level Equity Growth Partners V, L.P.
Aspex Global Fund	Level Equity Growth Partners VI, L.P.
Axiom Asia IV, L.P.	Level Equity Opportunities Fund 2018, L.P.
Axiom Asia V, L.P.	Metropolitan Real Estate Partners Global II, L.P.
Bank of America	Mucker Early II, L.P.
Baupost Value Partners, L.P. - IV	Mucker Early III, L.P.
CB Offshore Technology Opportunities Fund II, Limited Partnership	OHA Strategic Credit Fund II (Offshore), L.P.
Cendana Capital IV, L.P.	Park Street Capital Natural Resource Fund IV, L.P.
Cendana International II, L.P.	Park Street Capital Natural Resource Fund V, L.P.
Charlesbank Equity Fund X, Limited Partnership	Santander Bank
Charlesbank Technology Opportunities Fund, Limited Partnership	Sentinel Capital Partners VI, L.P.
Citizens Bank	Sentinel Capital Partners VII, L.P.
Commonfund Capital International Partners VI, L.P.	Sentinel Junior Capital I, L.P.
Commonfund Capital International Partners VII, L.P.	Sentinel Junior Capital II, L.P.
Commonfund Capital Natural Resource Partners VII, L.P.	Silversmith Capital Partners II-B, L.P.
Commonfund Capital Natural Resources Partners VIII, L.P.	Silversmith Capital Partners III-B, L.P.
Commonfund Capital Private Equity Partners VI, L.P.	Silversmith Capital Partners IV-B, L.P.
Commonfund Capital Private Equity Partners VII, L.P.	State Street Global Advisors
Commonfund Capital Venture Partners IX, L.P.	StepStone VC Secondaries Fund III, L.P.
Commonfund Capital Venture Partners VII, L.P.	StepStone VC Secondaries Fund IV, L.P.
Commonfund Capital Venture Partners VIII, L.P.	StepStone VC Secondaries Fund V, L.P.
Commonfund Capital Venture Partners XI, L.P.	Summit Partners Growth Equity Fund IX-B, L.P.
D1 Capital Partners Offshore LP	Summit Partners Growth Equity Fund X-B, L.P.
Denham Commodity Partners Fund VI LP	Summit Partners Growth Equity Fund XI-B, L.P.
Dover Street IX L.P.	The Mangrove Partners Fund (Cayman Drawdown), L.P.
Dover Street X L.P.	Thrive Capital Partners IX Growth, L.P.
Dover Street XI L.P.	Thrive Capital Partners IX, L.P.
Durable Capital Offshore Fund Ltd.	Thrive Capital Partners VIII Growth, L.P.
Elliott International Limited	Thrive Capital Partners VIII, L.P.
Fidelity Investments	Tiger Global Crossover (Cayman), L.P.
Fortress Credit Opportunities Fund III (B) LP	Tiger Global Long Opportunities, Ltd.
Fortress Credit Opportunities Fund IV (B) LP	TrueBridge Capital Partners Fund V, L.P.
GOF II Feeder A, L.P.	TrueBridge Capital Partners Fund VI, L.P.
GQG Partners Global Equity Fund	TrueBridge Capital Partners Fund VII, L.P.
HarbourVest Real Assets Fund III L.P.	TrueBridge Global Premier I, LP
HarbourVest Real Assets Fund IV L.P.	Vanguard Short Term Treasury Admiral Shares
Hollyport Secondary Opportunities VII LP	Vanguard Total World Stock Index Fund Institutional Shares
Horsley Bridge XI Growth Buyout, L.P.	Viking Global Opportunities III LP
Hosking Partners Global Equity Fund	Wellington Global Research Equity Extended Fund (Cayman) Ltd
Janchor Partners Opportunities Offshore Fund II L.P.	Wells Fargo Advisors
JNE Fund Ltd	