

CONFLICT OF INTEREST POLICY
PROVIDENCE COLLEGE

Trustees, non-Trustee members of Board Committees¹, Officers, and Selected Employees² 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

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

² "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 25

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

AMP		CyberComm Inc.
ATR/Treehouse		DATTCO
Aborn Window Shade Manufacturing Company		DGI Communications, LLC
Academic Programs International		DIS
Action Contracting Services Inc		Daikin Applied
Aero Mechanical, Inc.		Design Fabricators, Inc.
Affinaquest Technologies, LLC		DiaMedical USA Equipment LLC
Agilent Technologies, Inc.		Dimeo Construction Company
Air Planning LLC		Dominican Sisters of St. Cecilia Congregation
Amazon Capital Services, Inc.		EBSCO Information Services
American Institutes for Research		Eagle Rivet Roof Services Corp.
American University		Earthwise Energy Technologies, LLC
Anatamage, Inc.		Elementar Americas, Inc.
Arcadia University		Ellucian Company LLC
Arden Engineering Constructors, LLC		Elsevier
Art & Science Group LLC		ePlus Technology Inc.
Arthur J. Gallagher Risk Management Services, LLC		Exeter Renewables 1, LLC
Assessment Technologies Institute, LLC		Exquisite Events
Atlantic Elevator South Company Inc		Fairfield University
Audio Spectrum Inc.		Farrar & Associates, Inc.
B&H Photo-Video Incorporated		Fire Systems Incorporated
BCG Connect, LLC		Fisher Scientific Company, LLC
Barnes & Noble College Booksellers, LLC		Flood Ford of East Greenwich
Bartlett Tree Experts		Ford Credit
Bauer Hockey, LLC		Foresight Sports
Benefit Trust Care and Support		GKT Refrigeration Inc
Big East Conference Inc		GPS-Gil's Property Services LLC
Bill Lizotte Architectural Glass & Aluminum, Inc.		Gaumard Scientific Company Inc.
Blackhorse Farm Solar, LLC		GiveCampus, Inc.
Blue Cross & Blue Shield		Global Academic Ventures LLC
Boston University		Governmentjobs.com , Inc.
Branch Floor Covering		Grainger
Breeze Airways		HELIN Inc
CBIZ Insurance Services, Inc.		Herff Jones LLC
CIEE, Inc.		High Output Inc
COSMED USA, Inc.		Hudl
Caputo and Wick Ltd		Huron Consulting Services LLC
Catholic Studies in Rome, Inc.		IES Abroad
City of Providence		Instructure, Inc.
Coast to Coast		J & B Communications Inc
Columbus Door Company		Jacavone Construction Corp
Community Initiatives		Jennifer J. Nadeau M.D., LLC
Coursedog, Inc		John C. Digertt Incorporated
Cox Communications		Joseph Tavone Incorporated
Creative Office Resources		KJ Branding
Crown Supply Co Inc		KPMG LLP
Cultural Experiences Abroad		Korel Controls Inc

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LRF Inc.		Roadrunner Modern Waste + Recycling
Laerdal Medical Corporation		Robin Hollow Solar LLC
Lincoln Life Assurance Company of Boston		Rossi Electric Company, LLC
Loligo Systems		SHI International Corp
Luxedo		SMMA
MB Signs and Graphics		SRSD Online Partners
Marshall Food Equipment Service, Inc.		Salesforce.com , Inc.
Mechanical Hygiene Services		Sallie Mae Servicing Corporation
Meridian Printing		Savoy Contract Furniture
Merion Golf Club		Sign Design Inc
Meyer's RV		Signature Printing Inc
Microsoft Corporation		Site Tech Corporation
NRG Business Marketing, LLC		Sodexo Incorporated & Affiliates
Narragansett Bay Commission		Solar Breakers, LLC.
New England Star Remodeling & nextSource, Inc.		Spencer, Sullivan & Vogt, Inc.
Niche.com , Inc.		Sterling Engineering Co Inc
Nikon Instruments Inc.		Sun Life Assurance Company of Canada
OSHEAN, Inc.		Superior Lawn Maintenance Inc.
OVG Global Partnerships, LLC		TeamDynamix Solutions LLC
One Diversified, LLC		Teamworks Innovations, Inc.
Opendorse, Inc.		The College Board
Oracle America Inc		The S/L/A/M Collaborative, Inc.
Outside the Frame		The Skyline Group, Inc.
P. Mandarini Inc.		Thomas-Young Associates Inc
PIDC Construction, LLC		Trane U.S. Inc.
Paciolan LLC		Transact Campus Inc.
Peak Event Services Inc.		Twang, Inc.
Pilgrim Title Insurance Company		Two Rivers Travel
Pranzi, Inc.		UG2 LLC
Prime Time Sports Incorporated		University of New Hampshire
Priory of St. Thomas Aquinas		University of Notre Dame
Professional Ambulance LLC		Usentra Security Services
Providence Sportservice		VWR International LLC
Providence Water		Valet Park of America
Quality Rental Center		WB Mason Co Inc
RI Department of Employment & Training		Wannamoisett Country Club
RIHEBC		Wellfleet Group
Resolute Industrial LLC		Western Dominican Province
Rhode Island Convention Center		Whalley Computer Associates Inc.
Rhode Island Energy		Witt/Kieffer
Riptide Technologies		Xerox Corporation
		Zamboni Company USA, Inc.

List of Investments FY 26

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