



CONFLICT OF INTEREST POLICY ADDENDUM

The types of conflicts of interest described in “Article II. Definitions” of NSCP’s Conflicts of Interest Policy (“Policy”) and the relationships reflected in those areas that may give rise to a conflict of interest are not intended to be exhaustive. Conflicts of interest can and will arise beyond those described and/or through other relationships. Individuals associated with NSCP who are subject to the organization’s Policy (generally, members of the Board of Directors, NSCP’s principal officers, and any member of a committee that has been delegated decision-making authority by the Board) are expected to have a significant awareness and sensitivity to these potential conflicts of interest.

For example, a conflict of interest may arise through:

1. Holding office, serving on the board of directors, participating in management, or being otherwise employed (or formerly employed) by a third party that provides services to NSCP;
2. Using NSCP’s resources, personnel, or good will other than for approved NSCP activities, programs, and purposes;
3. Using intellectual property of NSCP or of one of NSCP’s volunteers without appropriate permissions (<https://community.nscp.org/termsandconditions>), and if reasonably applicable, without appropriate attribution, and otherwise in accordance with NSCP’s terms and conditions. Rebranding or repurposing NSCP materials for marketing or commercial purpose is not in accordance with NSCP membership guidelines and may violate intellectual property rights
4. Engaging in outside employment or other activity in a manner that has a materially adverse effect on such person’s obligations to NSCP; competes with NSCP’s activities; or implies NSCP’s sponsorship or support of the outside employment or activity. (For the avoidance of doubt, absent complicating factors this is not intended to prohibit NSCP volunteers from speaking or writing for other organizations connected to the financial services industry unless such activity is demonstrably adverse to the interests of NSCP.)

The fact that one of the situations described above (or an analogous situation) exists does not necessarily mean that (i) that the conflict is material enough to be of practical importance to NSCP, or (ii) that the material conflict, upon full disclosure of all relevant facts and circumstances, is necessarily adverse to the interests of NSCP.

However, it is the policy of the Board that the existence of any of the potential conflicts described above (or analogous situations) should be disclosed on a timely basis to the Chair of the Governance Committee.

It is the continuing responsibility of the members of the Board of Directors, NSCP’s principal officers, and any member of an NSCP committee that has been delegated decision-making authority by the



Board to remain vigilant for potential conflicts of interest and to promptly disclose such conflicts reasonably considered to be material to the Chair of the Governance Committee.

Upon determining a potential material conflict of interest exists, the Governance Committee Chair will convene the Governance Committee to further review.

Questions relating to the Policy or this Addendum should be directed to either the Chair of the Board of Directors or the Chair of the Governance Committee.