

Conflicts of Interest Policy for Trustees

Marquette University (the "University") hereby declares the following policy and establishes the following procedure for disclosure of any material financial interest or affiliation on the part of a Trustee that may be in conflict with the Trustee's duty to the University. Upon such disclosure, the Board of Trustees shall then determine what action, if any, is required to resolve or to manage any resulting conflict.

For purposes of this policy, "material financial interest or affiliation" includes, but is not limited to, (1) service by the Trustee or by the Trustee's spouse as an officer, partner, director or trustee of an Entity; (2) receipt by the Trustee or by the Trustee's spouse together from an Entity that has a financial relationship with the University of amounts in excess of Ten Thousand Dollars (\$10,000); or (3) the ownership by the Trustee or the Trustee's spouse together of five percent (5%) or more of the beneficial or proprietary interest in an Entity. An "Entity" is a person, corporation, or other business organization that has a financial relationship with the University or a related entity or that is actively seeking to have a financial relationship with the University or a related entity.

1. Although Trustees are not required by this policy to disclose financial or other relationships that do not meet the definition of a "material financial interest or affiliation" above, Trustees must be sensitive to situations or positions that may give rise to the appearance of a conflict of interest. Accordingly, Trustees must notify the Chair of the Board and/or the Trusteeship Chair prior to

completeness and shall provide such additional information as may be appropriate to the Chair of the Board of Trustees concerning whether any of the disclosures may require action by the Board of Trustees. Disclosure Statements are confidential and shall be maintained by the Corporate Secretary or Assistant Secretary.

4. If the Chair of the Board of Trustees determines that a Trustee has a material financial interest or