

**NORTH CAROLINA DEPARTMENT OF STATE TREASURER  
INVESTMENT MANAGEMENT DIVISION**

**External Investment Management Conflict of Interest Certification**

**When form is required.** The Department of State Treasurer personnel listed below shall read, complete, and forward to the Compliance Officer this form for each:

- New commitment of funds to an External Investment Manager;
- Contract renewal or new contract with an External Investment Manager; or
- Contract amendment that alters the compensation due to an External Investment Manager.

**Definitions.** For the purposes of this form:

- “External Investment Manager” shall have the meaning provided in the *External Investment Manager and Vehicle Selection Policy and Procedures*.
- “Conflict of Interest” shall mean circumstances that create a material risk that professional judgment or actions regarding the transaction’s recommendation, approval, or execution have been or will be unduly influenced by a direct or indirect personal interest.
- “Family” shall mean immediate family (mother, father, brother, sister, wife, husband, or child), either by birth, by marriage, by engagement to be married, or through a live-in domestic partnership that is similar to marriage; lineal ascendants (grandparents, etc.); and lineal descendants (grandchildren, etc.).

**Name of External Investment Manager and/or Fund:** \_\_\_\_\_

I understand and have adhered to the Department of State Treasurer, Investment Management Division’s *Code of Ethics and Conduct* and other applicable policies in this recommendation, negotiation, and approval process and certify my participation in this process is not precluded, because to the best of my knowledge:

1. My Family and I have NO material financial interest (i.e., \$10,000 or more) in the External Investment Manager.
2. I am NOT a Family member of anyone who is employed by the External Investment Manager.
3. I have NOT been employed with the External Investment Manager within the past five (5) years.
4. I have NOT sought employment NOR discussed potential employment with the External Investment Manager.
5. I have NO Conflicts of Interest in the recommendation, negotiation, and/or approval of the External Investment Manager.
6. I voluntarily choose to disclose the following facts which I believe do not constitute a Conflict of Interest and do not preclude my unbiased participation in the recommendation, negotiation, and/or approval of the External Investment Manager. (If so, initial in the left margin and make any disclosure on attached sheets.)

**Portfolio Manager:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Director:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Chief Investment Officer:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**General Counsel (or designee):** \_\_\_\_\_ **Date:** \_\_\_\_\_

**State Treasurer:** \_\_\_\_\_ **Date:** \_\_\_\_\_