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|  |  |  |
| **Full Name** |  | **Date** |
|  |  |  |
| **Position/Job Title** |  | **CAPID** (If applicable.) |

**1. PURPOSE.**

**a.** CAP often solicits its employees and others for their opinions regarding subjects on a wide variety of products and services; for example: aircraft, vehicles, communications, computer hardware and software. Concerns arise when financial or other personal considerations may compromise, or have the appearance of compromising, an individual's professional judgment and independence in the recommendations, assessments, or opinions, provided to CAP. CAP policy explicitly provides that:

No Board of Governors member, staff [employee] or volunteer may use corporate property, information or position for improper personal gain or benefit.

Any individual who becomes aware of a conflict of interest or potential conflict of interest must report it appropriately.

**b.** Furthermore, in compliance with 2 Code of Federal Regulations §200.318(c)(1):

No CAP employee or volunteer member shall participate in the selection, award, or administration of a contract supported by a Federal award if a real or apparent conflict of interest would be involved. Such a conflict would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract. The officers, employees, and agents of CAP shall neither solicit nor accept gratuities, favors, or anything of monetary value from contractors, or parties to subcontracts.

**c.** The purpose of this statement is to document real, apparent, or potential conflicts of interest that do or may exist regarding business decisions arising from recommendations, assessments, or opinions, given individually or as part of a group, which you provide to CAP.

**2. USE.** This statement will be used to notify CAP of any real, apparent, or potential conflicts of interest that you have or may have. CAP may use this statement to limit your participation in decision making processes where procurement and/or scientific community contributions are required. If you choose not to file this statement, CAP, may also limit such participation. CAP may request that you file a new, updated statement on an annual or more frequent basis; however, if you become aware of a conflict that has not been disclosed earlier, you must contact CAP immediately.

**3. PRIVACY.** This statement will be filed with CAP. Copies of your completed statement may be acquired by submitting a request to the Chief Operating Officer. CAP may discuss the contents of this statement with others if it is necessary to do so in the fulfillment of its mission.

**4. DEFINITION.** The term "real or apparent conflict of interest" refers to situations in which financial or other personal considerations may compromise, or have the appearance of compromising, an individual's professional judgment in procurement, and scientific and/or technical spheres of activity in which CAP is involved.

**5. DISCLOSURE REQUIREMENT**

**a.** CAP requires that you disclose below all relationships that you or your immediate family has with commercial entities that perform services, manufacture hardware or software, or otherwise are involved in the scientific or technical spheres of activity in which CAP is involved. Relevant relationships that should be disclosed include but are not limited to beneficial interests\* in such commercial entities, options or warrants to purchase stock or other equity interests, employment arrangements, or advisory and consulting positions with such commercial entities, as well as any other personal and professional relationships that provoke questions of loyalty, including any contingent benefit or compensation the receipt of which is conditioned on CAP purchasing any product or service.

**b.** Please check one of the following boxes and provide the relevant information.

To the best of my knowledge and belief, I have no real or apparent conflicts of interest as defined above.

To the best of my knowledge and belief, I have or may have the following conflicts of interest as defined above (Please list organizations and your relationship to that organization; continue on a separate sheet of paper if necessary):

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| **ORGANIZATION** | | **RELATIONSHIP** |
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**c.** The answers to the foregoing questions are correctly stated to the best of my knowledge, information and belief.

**d.** I hereby agree to notify CAP promptly of any changes in the foregoing information.

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| --- | --- | --- |
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| **Signature** |  | **Date** |

\* Generally, the term “beneficial interests” refers to any direct or indirect ownership of stock or other equity interests (including, but not limited to, capital units in a limited liability company or interest in a partnership) which entitles you to any of the rights or benefits of ownership, even though you may not be the holder of record of such interests. For example, stock held in “street name” over which you exercise voting or investment power would be considered beneficially owned by you. Other examples of indirect ownership include ownership by a partnership in which you are a partner or by an estate or trust of which you or any member of your immediate family is a beneficiary. Ownership of stock or equity interests held in the names of your spouse, minor children or other relatives who live in the same household may be attributed to you.