

CONFLICT OF INTEREST POLICY

All those involved in making recommendations to the District Court for awards of funds from the \$38 million cy pres funds being distributed, including class counsel, Advisory Committee members, and consultants Echo Hawk Consulting (“covered persons”), will abide by the following conflict of interest policy:

1. A covered person will not accept any gifts or favors from any entity that is seeking to receive a grant from the NAAFTF.
2. A covered person will not provide grant writing assistance or other services designed to assist a specific applicant in obtaining funds from NAAFTF, other than providing information about the application process, which information will be freely available to all applicants.
3. Each covered person will disclose the identity of organizations in which they, their spouse or a dependent child are a director, officer, employee or partner, if that organization is one which could conceivably apply for funds from NAAFTF. Any covered person who has such a relationship with an organization that applies for funds will recuse himself or herself from evaluating such application and will not seek to influence the votes of others on that application.
4. Each covered person will disclose the identity of organizations which they have an ongoing business relationship with (i.e. attorney-client or consulting clients) if that organization is one which conceivably could apply for funds from NAAFTF. Any covered person who has such a relationship with an organization that applies for funds will recuse himself or herself from evaluating such application and will not seek to influence the votes of others on that application.