IRS FORM 990 REPORTING POLICY

The purpose of this policy is to enable The Class of ______ of Yale University (the "Class") to satisfy its reporting obligations under IRS Form 990 (*Return of Organization Exempt from Income Tax*).

- A. The Treasurer shall keep a current record of all officers and individuals with governing authority under the Class Constitution or By-laws ("Covered Persons"). The Association of Yale Alumni will assist the Treasurer in maintaining this list.
- B. Each Covered Person shall report to the Treasurer as soon as reasonably practicable any of the following conditions or events, if they occur:
 - 1. <u>Family/Business Relationships</u>: a Covered Person has a family relationship (e.g., spouse, child, grandchild, sibling) or a business relationship (e.g., employee/employer, co-directors or co-owners of a business, parties to transactions in amounts exceeding \$10,000 not in the ordinary course) with any other Covered Person;

2. <u>Business Transactions</u>:

- a. a Covered Person or any family member engages in a direct business transaction with the Class, or an indirect business transaction through direct or indirect ownership of more than 35% in any entity (individually or collectively with other Covered Persons or their family members), in an amount exceeding \$10,000 in the fiscal year;
- b. a Covered Person or any family member serves as an officer, director, trustee, key employee or partner of an entity, or a shareholder of a professional corporation, doing business with the Class in an amount exceeding \$10,000 in the fiscal year;
- 3. <u>Compensation</u>: a Covered Person receives total compensation or other payments exceeding \$10,000 from the Class in the fiscal year; or
- 4. <u>Grants; Loans</u>: the Class provides a Covered Person, a Class donor, a member of a grantmaking committee, or any of their family members, or an entity in which such individual has a greater than 35% interest, with a grant or other assistance, or the individual provides or receives a loan.