| ADMINISTRATIVE DIVISION | POLICY NUMBER | |
|--|--|--|
| FINA Administration and Finance | FINA 5.40 | |
| POLICY TITLE | | |
| Financial Management Disclosure | | |
| SCOPE OF POLICY | DATE OF REVISION | |
| USC System | February 17, 2025 | |
| Responsible Officer | ADMINISTRATIVE OFFICE | |
| Executive Vice President for Finance and | University Finance – Controller's Office | |
| Chief Financial Officer | | |

PURPOSE

This policy guides the communication of financial information to the Board of Trustees, ensuring consistent and relevant disclosure for informed decision-making.

DEFINITIONS & ACRONYMS

Material: A significant amount, transaction, or discrepancy in the financial statements that would reasonably impact the decisions of the users relying on the information if it was omitted.

POLICY STATEMENT

To effectively govern the University System through the development of goals, plans, and policies, the Board of Trustees must receive relevant and timely financial information. Based on scope and/or impact, the Controller's Office is responsible for using the following guide to disclose respective information to the Board of Trustees, specifically the Chair of the Audit, Compliance, and Risk Committee, in a prompt manner.

- Errors, fines/fees, issues, etc. exceeding a dollar threshold of \$100,000.
- Matters involving potential theft, misappropriation, or fraud and/or deliberate violations of internal controls, regardless of amount.
- Systemic issues impacting the ability to properly account for and/or record financial transactions as required by regulatory bodies, accounting standards, and/or University policy.
- Matters identified which are or must be disclosed to external auditors as potentially requiring material restatement of prior year financial statements or material notes to the current financial statements.

All financial issues occurring at the unit or department level, regardless of amount, should be promptly communicated to the Controller's Office by unit/departmental personnel. The Controller's Office will make the appropriate determination regarding which matters need to be subsequently reported to the Board of Trustees.

PROCEDURES

There are no procedures for this policy. Questions may be sent to the Controller's Office at <u>controller@sc.edu</u>.

RELATED UNIVERSITY, STATE, AND FEDERAL POLICIES

BTRU 1.18 Conflict of Interest and Commitment BTRU 1.20 Dishonest Acts and Fraud BTRU 1.24 Internal Control FINA 5.60 External Audit Management RSCH 1.06 Disclosure of Financial Interests and Management of Conflicts of Interest Related to Sponsored Projects

HISTORY OF REVISIONS

| DATE OF REVISION | REASON FOR REVISION |
|-------------------|---|
| February 17, 2025 | New policy for the USC System documenting |
| | guidance for disclosing financial information |
| | to the Board of Trustees. |