

February 17, 2023

Mr. Emory A. Rounds, III
Director
U.S. Office of Government Ethics
1201 New York Avenue, NW
Suite 500
Washington DC, 20005

Dear. Mr. Rounds:

The purpose of this letter is to forward the attached amendment to Ms. Bennett's Ethics Agreement dated November 29, 2021. Ms. Bennett explains in her letter dated February 16, 2023 the reasons for the amendment are as follows:

Though not required to resign from these positions, I initially decided to resign as trustee of these trusts. After finding it difficult to resign from each of these five positions, I will now retain my position as a trustee of Family Trust # 1, Family Trust #2, Family Trust #3, Family Trust # 4 and Family Trust #5.

As the Designed Agency Ethics official of the U.S. Agency for Global Media, I have reviewed the updated information contained in the amendment and, based upon my review of these and the prior commitments made by Ms. Bennett in her previously transmitted Ethics Agreement, I continue to believe that Ms. Bennett is in compliance with applicable laws and regulations governing conflicts of interest.

Sincerely,

A handwritten signature in dark ink, appearing to read 'D. Kligerman', with a long horizontal stroke extending to the right.

David Kligerman, General Counsel and Designated
Agency Ethics Official

EA Amendment

February 16, 2023

Mr. David Kligerman,
General Counsel and
Designated Agency Ethics Official
Office of the General Counsel
U.S. Agency for Global Media
Washington, D.C. 20520

Dear Mr. Kligerman:

The purpose of this letter is to amend my ethics agreement signed on November 29, 2021.

I serve as a trustee for each of the following trusts which are listed in Part 1 of my financial disclosure report:

- Family Trust #1
- Family Trust #2
- Family Trust #3
- Family Trust #4
- Family Trust #5.

Though not required to resign from these positions, I initially decided to resign as trustee of these trusts. After finding it difficult to resign from these five positions, I will now retain my position as a trustee of Family Trust # 1, Family Trust #2, Family Trust #3, Family Trust # 4 and Family Trust #5. I will not receive any fees for the services that I provide as a trustee during my appointment to the position of Chief Executive Officer. I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of any of these trusts, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2).

I have been advised that this amendment to my ethics agreement will be posted publicly, consistent with 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics with ethics agreements of other Presidential nominees who file public financial disclosure reports.

Sincerely,

Amanda
Bennett

Digitally signed by
Amanda Bennett
Date: 2023.02.16
15:32:09 -05'00'

Amanda Bennett

November 29, 2021

Mr. David Kligerman,
General Counsel and
Designated Agency Ethics Official
Office of the General Counsel
U.S. Agency for Global Media
Washington, D.C. 20520

Re: Ethics Undertakings

Dear Mr. Kligerman:

The purpose of this letter is to describe the steps that I will take to avoid any actual or apparent conflict of interest in the event that I am confirmed for the position of Chief Executive Officer of the U.S. Agency for Global Media. It is my responsibility to understand and comply with commitments outlined in this agreement.

SECTION 1 - GENERAL COMMITMENTS

As required by the criminal conflicts of interest law at 18 U.S.C. § 208(a), I will not participate personally and substantially in any particular matter in which I know that I have a financial interest directly and predictably affected by the matter, or in which I know that a person whose interests are imputed to me has a financial interest directly and predictably affected by the particular matter, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1), or qualify for a regulatory exemption, pursuant to 18 U.S.C. § 208(b)(2). I understand that the interests of the following persons are imputed to me:

- Any spouse or minor child of mine;
- Any general partner of a partnership in which I am a limited or general partner;
- Any organization in which I serve as an officer, director, trustee, general partner, or employee; and
- Any person or organization with which I am negotiating or have an arrangement concerning prospective employment.

In the event that an actual or potential conflict of interest arises during my appointment, I will consult with an agency ethics official and take the measures necessary to resolve the conflict, such as recusal from the particular matter or divestiture of an asset.

If I have a managed account or otherwise use the services of an investment professional during my appointment, I will ensure that the account manager or investment professional obtains my prior approval on a case-by-case basis for the purchase of any assets other than cash, cash equivalents, investment funds that qualify for the regulatory exemption for diversified mutual funds and unit investment trusts at 5 C.F.R. § 2640.201(a), obligations of the United States, or municipal bonds.

I will receive a live ethics briefing from a member of the ethics office after my confirmation but not later than 15 days after my appointment pursuant to the ethics program regulation at 5 C.F.R. §

2638 .305. Within 90 days of my confirmation, I will submit my Certification of Ethics Agreement Compliance which documents my compliance with this ethics agreement.

I understand that as an appointee I will be required to sign the Ethics Pledge (Exec. Order No. 13989) and that I will be bound by it. Among other obligations, I will be required to recuse from particular matters involving specific parties involving my former employer or former clients for a period of two years after I am appointed, with the exception of federal, state, and local governments.

I will not modify this ethics agreement without your approval and the approval of the U.S. Office of Government Ethics pursuant to the ethics agreement requirements contained in the financial disclosure regulation at 5 C.F.R. § 2634.803(a)(4).

SECTION 2 – RESIGNATIONS

Upon confirmation, I will resign from my positions with the following entities:

- Family Trust #3
- Family Trust #5, Article Fourth Trust
- University of Southern California Annenberg Center on Communications Leadership & Policy
- Committee to Protect Journalists
- German Marshall Fund of the United States
- IREX
- Lenfest Institute for Journalism

Pursuant to the impartiality regulation at 5 C.F.R. § 2635.502, for a period of one year after my resignation from each of these entities, I will not participate personally and substantially in any particular matter involving specific parties in which I know that entity is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

SECTION 3 – GIRL REPORTER, LLC

I am the sole member of Girl Reporter, LLC, an entity organized to receive the rent on, and manage, a rental property jointly owned by my spouse and myself. Upon confirmation, I will resign from my position with Girl Reporter, LLC and will transfer my equity interests in Girl Reporter, LLC to a family member whose interests are not imputed to me. This family member also will take over all of my management activities at the company. Until I have completed the transfer, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of Girl Reporter, LLC, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1). In addition, pursuant to the impartiality regulation at 5 C.F.R. § 2635.502, for a period of one year after my resignation, I will not participate personally and substantially in any particular matter involving specific parties in which I know Girl Reporter, LLC, is a party or represents a party, unless I am first authorized to participate, pursuant to 5 C.F.R. § 2635.502(d).

SECTION 4 - FAMILY TRUSTS

Upon confirmation I will also resign from my position as a trustee of Family Trusts #1, #2 and #4. Because I will continue to have a financial interest in Family Trusts #1, #2, and #4, I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of any of these three trusts unless I first obtain a written

waiver pursuant to 18 U.S.C. § 208(b)(1) or qualify for a regulatory exemption pursuant to 18 U.S.C. § 208(b)(2).

SECTION 5 – SPOUSE EMPLOYMENT

My spouse is the Chairman of Graham Holdings Company, and he has an equity interest in Graham Holdings Company. I will not participate personally and substantially in any particular matter that to my knowledge has a direct and predictable effect on the financial interests of Graham Holdings Company, unless I first obtain a written waiver, pursuant to 18 U.S.C. § 208(b)(1).

SECTION 6 - PUBLIC POSTING

I have been advised that this ethics agreement and the Certification of Ethics Agreement Compliance will be posted publicly, consistent with the public information law at 5 U.S.C. § 552, on the website of the U.S. Office of Government Ethics with ethics agreements of other Presidential nominees who file public financial disclosure reports.

Sincerely,

A handwritten signature in black ink, appearing to read "Amanda Bennett", with a long horizontal flourish extending to the right.

Amanda Bennett