

IPPS CONFLICT OF INTEREST POLICY

The purpose of this section is to describe situations that may create potential or actual conflicts of interest, define the obligation to disclose such situations, and outline a process for handling potential or actual conflicts of interest. This policy applies to all Board members, Advisory Board members, Committee Chairs, other volunteers, speakers, consultants, staff, and any other individuals who are required to comply with this policy by written agreement (each referred herein as "Covered Individual").

IPPS expects Covered Individuals to use sound judgment and good faith in identifying actual and potential conflicts of interest with the broad objective of disclosing any activity or position that may give rise to a conflict. Covered Individuals are required to follow both the letter and the spirit of this policy in fulfilling their duties for IPPS. Covered Individuals must act in the best interests of IPPS and not in furtherance of personal or third-party interests. Covered Individuals have an obligation to ensure that IPPS maintains a bias-free decision-making process and to avoid all potential conflicts of interest. It is important that all individuals subject to the Conflict of Interest Policy understand the importance of full cooperation with this policy to assure maximum integrity of IPPS activities.

Board members, Advisory Board members, Committee Chairs, and staff: Conflicts of interest may arise when an individual has a financial or intellectual¹ interest or obligation that may create divided loyalty on the part of the individual between IPPS and some other organization or cause. Conflicts of interest may arise from a transaction between IPPS and a third party, or from an individual's volunteer, with or without financial compensation, or other relationship with a third party, which may compromise that individual's ability to provide unbiased judgment and undivided loyalty to IPPS or perception by others thereof.

What to include on the Disclosure Form:

- 1. All financial (equal to or above \$ 5000), intellectual, business, or other interest in any company, organization, service, product, or other concerns that might affect or be affected by IPPS activities.
- 2. All financial, intellectual, business, or other interest in a company, organization, service, product, or other concerns or interests held by their family members and business associates of which the Covered Individual has knowledge that might affect or be affected by IPPS activities. Family members include the person's spouse, domestic partner, children, parents, and other members of the household. A business associate is someone with whom the Covered Individual has a business relationship.

Examples of interests that must be disclosed:

- ownership of stock (not including stocks held in blind trusts, mutual funds or exchange traded funds over which the individual has no control)
- substantial gifts
- corporate (either nonprofit or for-profit) officer/directorships, professional activities/affiliations, management/leadership positions, and employment:
- memberships in organizations
- contracts, consultancy arrangements, business activities, and investments
- investigation or research support
- honoraria received as lecturer/paid attendee
- volunteer position with another non-profit
- other relationships and activities²

¹ Intellectual interests may be, but are not limited to, investigation or research support; corporate paid lecturer or attendee; private ownership interest in ancillary services; Officer or Board Member of a non-affiliated society; editorial position with non-IPPS publications, program oversight of non-IPPS meeting or guideline publication.

² If it is unknown whether a relationship or activity may be a potential conflict of interest, this may be disclosed for further review a determination by the EPEC.



Requirements to disclose, processes in place, and resolution of actual or potential conflicts of interest:

All Board members, Advisory Board, and Committee Chairs must disclose all actual or potential conflicts of interest annually by completing and submitting a Disclosure Form and must update the Disclosure Form if any significant changes or additions to the submitted information arise during the course of the year.

All disclosures will be made available in writing prior to any meeting of the Board of Directors or Annual Business Meeting. Minutes of any board meeting or business meeting must reflect any action taken to manage an actual or potential conflicts of interest during the meeting. For example, that there was a discussion on the matter without a board member in the room, and that a vote was taken but that the "interested" board member abstained (board members with a conflict are "interested" – board members without a conflict are "disinterested").

Annual Disclosures for Board members, Advisory Board members, and Committee Chairs will be submitted to the IPPS Executive Office and sent to the Ethics, Professionalism and Equality Committee (EPEC) for review.

EPEC will make a recommendation on any action to resolve actual or potential conflicts of interest to the Executive Board and/or the Executive Director. If there is uncertainty whether a conflict of interest may exist, the question shall be presented for determination to the Executive Board and/or Executive Director in consultation with legal counsel, as necessary. Actions to resolve conflicts of interest include the following.

- 1. Recuse an individual from board or committee discussion and/or vote
- 2. Terminate an individual from any IPPS role or from IPPS membership

Action taken by the IPPS to resolve any actual or potential conflicts of interest must directed to the Covered Individual in writing and cite the reasons in which the action is being taken.

A Covered Individual who has an actual or potential conflict of interest shall have the following options for resolution:

- 1. Excuse themselves from board and committee discussion and/or vote on conflicting item
- 2. Divest from any financial or intellectual interest in conflicted item
- 3. Resign from a IPPS leadership role
- 4. Resign as a member of IPPS
- 5. Any one or combination of these resolutions may be used to eliminate any conflicts of interest

The Covered Individual may appeal any recusal or termination by the IPPS using the following process:

- 1. Submit a written appeal to the IPPS
- 2. Written appeals will be reviewed and investigated by the Ethics, Professionalism and Equality Committee
- 3. EPEC will make a recommendation to the Board of Directors to enforce the resolution or to recommend a different action.
- 4. The Board of Directors will make a determination and inform the Covered Individual of its decision.