

Conflict of Interest Policy

The purpose of the Conflict of Interest Policy is to protect the interests, reputation and integrity of SIDM in the furtherance of its mission; and to provide guidance in identifying and resolving Conflicts of Interest (COI) on the part of Covered Persons. Disclosure is our principle mechanism for identifying conflict of interest. While absence of conflict can never be guaranteed, SIDM will administer a transparent procedure requiring disclosure of all relationships posing a COI, resolution of COI, and notification to the SIDM community and the public of such conflicts and resolutions.

Toward that end, SIDM requires all "Covered Persons" to provide SIDM with written disclosure of their relevant relationships, paid or unpaid, including all academic, research, institutional and personal ties creating a current or potential Conflict of Interest.

The SIDM Board of Directors is responsible for oversight and integrity of the Disclosure process, COI resolution and public notification. The Board may delegate specified implementation duties to the Conflict of Interest Compliance Officer, to the Executive Committee or to SIDM staff.

Definitions:

Conflict of Interest means an association, including a financial, business, or personal association, that has the potential to bias or create the appearance of biasing an individual's decisions in matters related to SIDM or the conduct of SIDM activities.

Conflicts of interest are not in and of themselves unethical or impermissible; indeed, they are often unavoidable and, in many cases, can be appropriately resolved. Recognition and reporting of potential conflicts, and sensitivity to how personal, financial and other relationships can be perceived by others are a prerequisite to resolving COI.

Conflict of Interest Compliance Officer is the Secretary of the Board of Directors unless otherwise designated by the Board President.

Conflict of Interest Disclosure Form is included in Appendix C.

Covered Persons are those individuals who are officers, directors, employees and committee chairs of SIDM, as well as contractors and volunteers designated by the President or CEO.

Process:

Notification and Training: This policy shall be distributed to each Covered Person within 30 days of that person becoming a Covered Person and at least once every 12 months while remaining a Covered Person. All Covered Persons shall complete designated training within 30 days of becoming a Covered Person and at least once every 4 years while remaining a Covered Person.

Disclosure: All Covered Persons shall submit the completed Conflict of Interest Disclosure Statement to the Conflict of Interest Compliance Officer within 30 days of becoming a Covered Person and at least once every 12 months while remaining a Covered Person. In addition to completing and submitting the annual Disclosure Statement, Covered Persons are required to immediately notify SIDM of any subsequent changes, new relationships, or newly pertinent interests or relationships posing a possible COI. Completed disclosure statements by Board members, staff and Committee Chairs shall be posted

on SIDM's website annually.

Review: The Conflict of Interest Compliance Officer shall review the completed Disclosure Statements and notify the CEO and the Executive Committee of any apparent Conflicts of Interest and refer the issue to the CEO in cases of an employee or contractor, and the Executive Committee in cases of any other Covered Person.

Resolution of Conflict of Interest: As soon as practical after notification of an apparent Conflict of Interest, the CEO, in cases of an employee (excluding the CEO) or contractor, or the Executive Committee, in all other cases, shall gather and examine the facts pertaining to the apparent COI, determine if it is an actual COI, and prepare a strategy for resolving it. Such strategies may include, but are not limited to:

1. Determination to allow or disallow the Covered Person from participating in a particular role on a project.
2. Requirement that the Covered Person's activities be supervised by a person who does not have a Conflict of Interest.
3. Recusal of the Covered Person from decisions that pose a Conflict of Interest.
4. Requirement that the Covered Person relinquish non-SIDM roles that pose a Conflict of Interest

The existence of the Conflict of Interest and the resolution for the Conflict of Interest shall be recorded in the minutes of the Executive Committee, and in an annual report to the Board of Directors. The annual report shall be publicly available via SIDM's website.

If any member of the Executive Committee shall have an interest in the matter of the apparent COI, that person shall recuse himself/herself from deliberation of the matter. The Executive Committee may proceed with deliberations provided that the committee retains a quorum. If no quorum is present, the President shall appoint one or more unconflicted Director(s) to a temporary role on the Executive Committee to take part in the deliberation and decision-making of the issue.

Maintenance of Records: The COI Compliance Officer shall be required to maintain records pursuant to this policy for a period of no less than the term of service of the Board member or committee chair; three years following the completion of contractual service; and three years following the termination of any employment, whichever is longer.

Review and Disclosure of Policy: As a standing agenda item, the Board and each of its Committees shall review this policy at least annually at the first meeting of the year, and such review shall be recorded in the Minutes of those meetings or another method of documentation acceptable to the COI Compliance Officer. A copy of this policy shall be made publicly available via SIDM's website along with contact information for the COI Compliance Officer.