



**Institute for International Medicine (INMED)**  
**Conflicts of Interest Policy**  
**Board of Directors**

I. Introduction

- A. Purpose: This policy provides guidelines, oversight, and standards for determining the existence of conflicts of interest of current or potential members of INMED's Board of Directors as well as providing a mechanism for the disclosure, management, and/or resolution of conflicts of interest. All members of the Board are required to complete an annual Conflicts of Interest Disclosure to ensure that conflicts are not detrimental to the interests or integrity of the mission, values, vision, and objectives of INMED.
- B. INMED recognizes that Board Members have education, experience, and expertise that are valuable to many entities. Board Members are required to disclose outside relationships so that a reasonable determination can be made regarding whether a conflict exists, and if necessary, to establish a method to manage the conflict. INMED Board Members should be aware of conflicts of interest and immediately address them as they occur. The President's office is responsible for providing support and guidance regarding possible conflicts as well as assisting in the administration of this policy.

II. Definition of Terms

- A. Board Member - a person that holds his or her position per the INMED bylaws.
- B. Conflict of Interest - a situation in which an INMED Board Member, his or her spouse, and/or dependents have a financial or other personal interest that may compromise or have the appearance of compromising judgment, actions, or decisions of such Board Member in the performance of his or her duties for INMED. Conflict of interest (COI) is a situation in which an individual's private financial interest



might interfere or appear to interfere with his or her professional obligations to the Institute for International Medicine or the conduct of the research. Such situations do not necessarily imply wrongdoing or inappropriate activities. However, in a university setting, they can compromise, or be perceived as compromising, important academic values, research integrity, or the university mission.

- C. Entity - any Person other than a natural person.
- D. Financial Interest - any interest with monetary value, including but not limited to, salary or other payments for services (for example, consulting fees or honoraria), equity interests (for example, stock, stock options, partnership, limited liability company or other equity ownership interests), debt interests (for example, bonds or notes), and intellectual property rights (for example, patents, copyrights, and royalties from such rights) regardless of the dollar amount. This does not include interests arising solely by reason of investment by a mutual fund, or other similar investment products, or blind trusts or de minimums holdings of equity or debt in an individual company.
- E. Institute for International Medicine (INMED) - a Missouri nonprofit educational corporation.
- F. Person - any natural person, any association or partnership, or other intangible organization (whether or not having legal existence) including any corporation, limited partnership, limited liability company, trust or other organization, and any government, governmental agency, court or other governmental instrumentality.
- G. Resolution Management Plan: Plan or action to address a Board Member's conflict of interest which can include reducing or eliminating the conflict, to ensure that the Board Member's duties will be performed in a manner that is in compliance with this policy and free from conflicts of interest.
- H. Spouse and Dependents: With respect to any Board Member, his or her spouse or domestic partner, children, and descendants (including by adoption).



### III. Activities requiring disclosure

A. For INMED Board Members, (for themselves and their spouse and dependents), the following relationships with any person that does business with or competes with the services of INMED, including for-profit or not-for-profit entities (academic entities, health education organizations, safety-net health services, etc.) must be reported.

1. Current employment
2. Any employment that has a financial business relationship with INMED.
3. Research-related activities as part of their assigned INMED responsibilities.

B. In some cases, interests of other relatives or related Persons (such as a business partner) of an INMED Board Member may create a reportable Conflict of Interest. This includes:

1. Participation in directorship, executive, or managerial or other positions
2. Written agreements or other business dealings
3. Financial Interests

### IV. Activities not requiring disclosure

A. INMED Board Members are free to become involved on a personal basis in political and community activities. Board Members are reminded that INMED's Code of Conduct prohibits the use of INMED resources or INMED brand to support these activities, unless approved by the President's office.

### V. Prohibited Activities

- A. Use of INMED processes, technology, innovations, content, or private information for personal financial gain.
- B. Compensation for conducting INMED research where payment is affected by the outcome of the research.
- C. Use of INMED staff or other resources for non-INMED purposes.
- D. Activities prohibited by law.



- E. Arrangements with outside organizations that are in direct competition with INMED and have not been approved by the President's Office.
- F. Involvement in the process for purchases of equipment, instruments, materials, or services for INMED from an entity in which the Board Member, or such person's spouse and/or dependents, have a financial interest.
- G. Giving, offering, or promising anything of value, as a representative of INMED, to any government official to enhance relations with that official or the government.
- H. Involvement in the process for the negotiation of contracts between INMED and any other person with respect to which the Board Member, or such person's spouse and/or dependents, have a financial interest.

## VI. Disclosure

- A. INMED Board Members are required to complete the INMED Disclosure Form at the following intervals:
  - 1. Prior to election to the INMED Board;
  - 2. Annually;
  - 3. Within 30 days any time the Board Member's professional or commercial relationships change;
  - 4. Upon request by the President's Office;
  - 5. When participating in research.
- B. Disclosures will be publicized in publications or reports.
- C. Completed and signed forms are maintained in the President's Office. When a possible conflict exists, review and resolution requirements will be conducted by the President.
- D. Identifying a Conflict of Interest
  - 1. If an INMED Board Member has questions as to whether an outside activity creates a Conflict of Interest, the Board Member should consult with the President's Office.



2. When a Conflict of Interest is identified, the President's Office will develop a Resolution Management Plan. This plan is implemented in collaboration with the INMED Board Member and is monitored and re-evaluated through the President's Office.
3. Board Members must comply with resolution requirements when possible conflicts exist.
4. Failure to disclose or resolve a Conflict of Interest will be subject to review and action by the President's Office in collaboration with the INMED Board of Directors, minus the Board Member in question.