

Conflict of Interest Disclosure Policy for CAGC Organizational Leaders and Staff

This policy applies to members of CAGC's staff, Board of Directors, Committee Chairs and Members, Task Forces, author groups and other leaders hereafter referred to as "CAGC organizational leaders and staff". Any individual involved in a CAGC activity or decision-making process has an obligation to disclose any conflicting or potentially conflicting personal, professional, or business interests he/she may have, directly or indirectly, with the relevant activity or decision.

A conflict of interest (COI) is a real or perceived conflict or bias that may interfere with objective decision making. Potentially conflicting interests may relate to CAGC's programs and services (e.g., educational courses) or its operations (e.g., contracts with third parties). In the event a chair, or member of a CAGC committee (collectively, referred to herein as "committee members") determines he/she has a conflict of interest on a particular matter, he/she shall disclose the conflict to the CAGC's Board of Directors and/or to the other committee members, as applicable. In addition to disclosing the nature of the conflict, CAGC organizational leaders, staff and committee members must propose an appropriate mechanism for managing the conflict over and above disclosure, if applicable. Determinations as to the appropriate mechanism for managing the COI should be made on a case-by-case basis by the Board of Directors.

In addition, participants in CAGC-related activities are obligated to disclose the positions they hold or relationships they have with other organizations or entities that may conflict, directly or indirectly, with their CAGC activities. They also have an obligation to disclose any significant financial interest in or other relationship with, an entity having a "commercial interest" in the activity. A commercial interest may exist not only where the entity's products or services are under consideration by CAGC, but also where the entity's products or services are in competition or potential competition with those under consideration. Other relationships or activities that may not be listed but that the CAGC organizational leaders and staff, or committee members, perceive to influence, or may give the appearance of potentially influencing, their CAGC activities, should also be disclosed.

By the disclosure of such interests, other participants will have the opportunity to take potential biases into consideration. In addition, the Board of Directors (or, as applicable, committee members) will be in a better position to determine whether the participant may have an interest in conflict with the interests of CAGC.

To help ensure full disclosure of any actual, potential or perceived COI, all participants in CAGC-related activities, including CAGC's organizational leaders and staff, must comply with this Policy and (at a minimum) annually sign and submit a COI Disclosure Form (Appendix A) to:

- (i) Acknowledge that he/ she is aware of and has read the COI policy; and
- (ii) Disclose the information described above

If, subsequent to any such annual disclosure (but prior to execution of a new annual Disclosure Form), a new COI arises, the CAGC staff member or organizational leader shall promptly make the required disclosure by submitting a revised Disclosure Form identifying the organization, business, group, entity, etc., and describing the nature of the relationship.

It is the responsibility of the members of the Board or, as applicable, committee members without a COI pertinent to the matter at hand, to interpret and apply this Policy. And, inasmuch as the Policy is stated in general terms, the Board or its designee(s) should use their best judgment in doing so.