

## Employee Conflict of Interest Policy

### Purpose

The purpose of this policy is to ensure the propriety of the actions of Critical Path Institute employees is transparent and that the organization is respected for its conformity to these policy standards.

### Definitions

**Employee:** An employee is anyone who is working part-time or full-time and receiving any financial remuneration from Critical Path Institute.

**Relevant Financial Interest:** An investment or equity in any entity that is greater than 5% ownership or has value that exceeds \$10,000.

**Conflict of Interest:** Conflict of Interest (COI) can be defined as any situation in which an individual or corporation (either private or governmental) is in a position to exploit a professional or official capacity in some way for their personal or corporate benefit.

**Relative:** A Relative is defined as the spouse, parents, siblings, children, and domestic partners or any others sharing a financial or household relationship with the Employee.

### Policy

1. Employees of Critical Path Institute will not accept honoraria, consultancies or gifts from any company or entity that develops or markets health-related products that are regulated by the FDA. Any exceptions to this must be approved in writing by the Critical Path Institute President/CEO.
2. All employees will be expected to report all real, potential or perceived conflicts of interest to the Critical Path Institute COI Committee as soon as they become aware of their COI. The COI Committee may ask the employee to make public disclosure of any real, potential or perceived COI or ask the employee to take corrective action(s) such as returning payments or gifts. A real, potential or perceived COI is deemed to exist when a Critical Path Institute employee or a relative of a Critical Path Institute employee can answer “yes” to any of the following:
  - Has a financial interest in any entity that develops or markets health related products that are regulated by the FDA where the interest is greater than 5% ownership or a value that exceeds \$10,000;
  - Has a financial interest in any entity that develops or markets health related products that are regulated by the FDA where the value of that financial interest cannot be readily determined (for example, stock that is not publicly traded);

- Has any other financial interest that the employee believes may interfere with, or be perceived to interfere with, his or her ability to act solely in the best interests of Critical Path Institute;
  - Has a proprietary interest in any aspect of the Institute's work, such as a patent, trademark, copyright, or licensing agreement;
  - Is an executive or director of any entity that develops or markets health related products that are regulated by the FDA;
  - Has a financial interest that requires disclosure to a Critical Path Institute funding source.
3. Financial interests such as mutual funds or 403(b) investments over which the employee has no control in buying and selling stocks are excluded; however, any self-directed mutual funds or 403(b) investments are subject to the parameters listed above.
  4. All real, potential or perceived COIs must be reported on the attached Disclosure Form which will be completed annually by each Employee. Real, potential or perceived COIs will be reviewed by a Conflict of Interest Committee (COIC) on a case-by-case basis to determine whether the COI has the potential to jeopardize Critical Path Institute's ability to accomplish its mission and whether the COI needs to be disclosed publicly, monitored or eliminated in order for the employee to remain in their position.