

# Global Health Impact Organization

## Conflict of Interest Policy

### 1. Introduction

- a) The Global Health Impact Organization (the Organization) is committed to managing its programs independently and objectively.
- b) The Organization neither holds assets in securities, nor recommends the purchase or sale of such assets.

### 2. Purpose and Definitions

- a) transparency is crucial to the success of the Organization's projects;
- b) a material conflict of interest is defined as an interest that, in light of all the circumstances, could reasonably be expected to affect independence or impartiality;
- c) any person exercising influence on the methodology or implementation of the Global Health Impact labeling system shall have no material conflict of interest.

### 3. Potential Conflicts of Interest

- a) direct sizeable business interest in a measured company;
- b) direct possession, purchase or sale of equity securities in a company that is measured by the Global Health Impact labeling;
- c) receiving financial compensation or other favors from a measured company or a company that itself has a conflict of interest;
- d) other interests that have been deemed potentially conflicting by the Board.

### 4. Management of Potential Conflicts of Interest

- a) *Disclosure*: Any person exercising influence on the methodology or implementation of the Global Health Impact labeling system must promptly disclose any conflicts of interest or changes in conflict status;
- b) The Program Director(s) shall determine whether disclosed potential conflicts of interest are 'material conflicts of interest' and take appropriate corrective action, if the Program Director(s) deems such action appropriate;

### 5. Corrective Actions

The Program Director may, at his or her discretion, refer any material conflict of interest or any violation of these policies to the Advisory Board for disciplinary and/or corrective action.