

**Subject: Rights/Ethics – Conflict of Interest for Board of Trustees, Officers, Directors and other Key Employees****Policy:**

May Institute recognizes that the potential for conflict of interest exists for decision-makers at all levels. May Institute will not participate in activities that could create potential conflicts of interest. This includes members of the governing board, administration, professional staff and all employees. It is our policy to request the disclosure of potential conflicts of interest so that action may be taken to ensure that such conflict does not influence objective decision making. This policy is available on our website and as requested.

**Procedure:**

Board of Trustees, Officers, Directors and other Key Employees

1. Annually or more frequently as necessary, Trustees, Officers, Directors and identified Key Employees will disclose conflicts of interest so that such conflicts do not influence objective decision making.
  - a. A disclosure form will be distributed on an annual basis and reviewed by the Senior Vice President of Human Resources.
  - b. Any action(s) or recommendation(s) will be made to the Steering Committee and the Board of Trustees who will make a final determination.
  - c. In the event that a potential conflict of interest has a direct implication for the care of an individual, May Institute may convene an ethics committee to assist in the resolution of the matter.
2. If a Trustee has a potential conflict of interest with any issue that requires a vote, the Trustee may withdraw from discussion and voting.
  - a. The Trustee will notify the Chairperson and ask to withdraw from discussion and any voting on the topic.
  - b. The meeting minutes will document the withdrawal of the Trustee and the circumstances.
  - c. The Trustee will follow the procedures outlined in number one, in regards to submission of a disclosure form.