**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.