

# Conflict of Interest Policy

for

The Executive Director and Council Members of  
The Collaborative Group of the Americas on Inherited Colorectal Cancer (CGA)  
and  
The CGA Collaborative Fund

## A. Purpose:

1. The purpose of this conflict of interest (COI) policy is to protect CGA's interests as they pertain to transactions or arrangements that might benefit the private interests of the Director, Council and/or Collaborative Fund members of the CGA.
2. A COI occurs when there is a overlap between the personal interest of an officer of the CGA (and/or the CGA's private interest) and their professional obligations such that an independent observer might reasonably question whether research funding, monetary investment, or other actions taken by the individual or the CGA may have been influenced by a *significant financial gain*, herein defined as 5000 dollars per year or more. COI depends on the situation, and not on the character or actions of an individual.
3. Even the perception of COI may be just as serious and potentially damaging as an actual COI. Apparent COI should be evaluated and managed with the same degree of consideration as known COI.
4. COI most often occurs in the following: leadership decisions, publications, scientific publications, investment decisions and research.
5. In order to identify and manage potential COI, a disclosure form will be required from the Director, Council members, and Collaborative Fund members and any others working on behalf of the CGA who are involved in any decision-making processes, including those who initiate, review and make decisions about proposals to purchase goods or services or publish materials in the name of the CGA.
6. The COI disclosure shall be made to the CGA at least annually (to cover the 12 months prior to submission) and at the earliest possible time when any potential conflict arises.
7. This policy is intended to supplement, but not replace, any applicable state and federal laws governing conflicts of interest applicable to nonprofit and charitable organizations.

## B. Conflicts of Interest

1. Employment or leadership position: any full or part-time employment or service as an officer or Board member for an entity having an investment, licensing, or other commercial interest in the subject matter under consideration, including but not limited to pharmaceutical or device companies, as well as all companies that work for or with pharmaceutical and/or device companies, must be disclosed.
2. Advisory role: consultant or advisory arrangements with an entity having an investment, licensing, or other commercial interest in the subject matter under consideration must be disclosed if consultation was performed or payments made for such consultation within one year of the activity or subject matter in question. This also includes any paid or unpaid working relationship with any venture capital, investment banking or other company which anticipates response to or makes recommendations which may be influenced by internal knowledge of specifics on company research, marketing, FDA filings or the like.
3. Stock ownership: including stock options, profit interests, partnerships, joint memberships or other relationships which could result in a potential financial interest or benefit at some time in

the future must be disclosed. Any ownership interest (except when invested in a diversified fund not controlled by the covered individuals) in a company, the stock of which is not publicly traded, or in any publicly traded company, including but not limited to pharmaceutical or device companies, as well as all companies that work for or with pharmaceutical and/or device companies, must be disclosed if the company is an entity having an investment relationship, licensing relationship, or other commercial interest in the subject matter under consideration.

4. Honoraria: Honoraria are reasonable payments for specific speeches, seminar presentations, or appearances. Disclosure of honoraria is required when paid directly to the covered individual by an entity having an investment, licensing, or other commercial interests in any subject matter under consideration or which might arise in the presentation or questions and when provided within two years of the activity or subject matter in question.
5. Research Funding: All payments associated with the conduct of any research or research project must be disclosed if provided by the trial sponsor or agents employed by the sponsor and may lead to apparent or actual COI.
6. Other remuneration: The value of trips, travel, gifts, or other in-kind payments not directly related to research activities must be disclosed if received from an entity having an investment, licensing, or other commercial interest in the subject matter under consideration.

C. Procedures:

1. COI disclosure information will be collected annually from the Administrative Director of the CGA, CGA Council and Collaborative Fund Board members (and will cover the 12 months prior to submission).
2. The first step in identifying significant COI is full disclosure of relevant information. The next step is *evaluation* of the disclosed information to determine whether a significant COI is present. If a conflict is identified, the third step is to institute measures for management of the conflict. In most instances, disclosure of the conflicting or potentially conflicting interest will itself suffice to protect the integrity of the subject's activity. In other words, once such a conflict is fully disclosed to the pertinent parties, they generally will be able to evaluate the possible influence of the disclosed interest.
3. A COI Task Force will serve to review all COI disclosures and shall also make inquiries as to questions or allegations which may arise.
  - a. The COI task force members shall consist of the immediate Past President of CGA, the Director of the Collaborative Fund; and the Administrative Director of CGA .
  - b. The COI task force members will report to the CGA Council.
  - c. The COI Committee shall establish the frequency of its meetings, with the exception that the Committee is expected to review COI annually.
4. Neither the Administrative Director of the CGA, CGA Council or Collaborative Fund Committee Members should alone enter into a transaction or arrangement that might benefit the private interests of the Administrative Director of the CGA, CGA Council or Collaborative Fund members. Rather, such decisions should be made by the CGA Council as per CGA Bylaws.
5. Whenever a Director, Council member, and/or Collaborative Fund member has a financial or personal COI in any matter coming before the Council, Fund, or membership of the CGA, the affected person shall:
  - a. Fully disclose the nature of the COI and
  - b. Recuse themselves from leading the purchase or decision-making process as well as recuse themselves from voting during the process (but they may participate in all discussions unless deemed inappropriate to do so by the Council).
  - c. Recusal should be documented in meeting minutes or proceedings.

- d. Disclosure information should be available to all those participating in the purchasing or decision-making process and should be included as part of the record documenting the final decision.
6. Any transaction or vote involving a potential COI shall be approved only when a majority of disinterested Council and/or Fund members determine that it is in the best interest of the organization to do so.
  - a. The minutes of meetings at which such votes are taken shall record such disclosure, abstention and rationale for approval.

D. Violations:

1. If the Directors, Council members, and/or Collaborative Fund members have reasonable cause to believe a member has failed to disclose actual or possible COI, it shall inform the COI Task Force with the basis for such belief. The COI Task Force will afford the member an opportunity to explain the alleged failure to disclose.
2. If, after hearing the response and after making further investigation as warranted by the circumstances, the COI Task Force determines failure to disclose an actual or possible COI, it shall report to the CGA Council and take appropriate disciplinary and corrective action.