

AIM Conflict of Interest Policy

Reason for Policy

The Association of Immunization Managers (AIM) is a nonprofit, tax-exempt, 501(c)(3) organization. Maintenance of the tax-exempt status is important for continued financial stability and for receipt of membership dues and contributions. The conflict-of-interest policy is an important piece of compliance with Internal Revenue Service and state and federal guidelines for nonprofits. This policy is intended to supplement but not replace any applicable state and federal laws governing conflict of interest applicable to nonprofit and charitable organizations.

A conflict-of-interest policy and related disclosure statements provide assurance that Executive Committee members, staff, and key volunteers are appropriately fulfilling their legal and fiduciary responsibilities. While serving on the nonprofit board (the AIM Executive Committee) or in service to the organization, an individual is responsible for acting in furtherance of the interests of the organization as opposed to in furtherance of personal interests or the interests of some third party. Executive Committee members, officers, and management employees have the responsibility of administering the affairs of AIM honestly and prudently, and of exercising their best care, skill, and judgment for the sole benefit of AIM. Those persons shall exercise the utmost good faith in all actions involved in their duties, and they shall not use their positions with AIM or knowledge gained from their position for their personal benefit. The interests of the organization must have the first priority in all decisions and actions.

Persons Concerned

This policy applies to AIM Executive Committee members, officers, and all AIM employees, consultants, and volunteers who can influence the actions of AIM ("Covered Person"). For example, this would include all persons who make purchasing decisions, all other persons who might be described as "management personnel," and all who have proprietary information concerning AIM. A volunteer is covered under this policy if that person has been granted significant independent decision-making authority with respect to financial or other resources of the organization.

Areas in Which Conflict May Arise

Conflicts of interest may arise with any of the following third parties:

- Persons and firms supplying goods and services to AIM.
- Persons and firms with whom AIM is dealing or planning to deal with in connection with any contract, grant, gift, purchase, or sale.
- Competing or affinity organizations.
- Donors, grantors, and others who financially support AIM
- Agencies, organizations, and associations that fund or otherwise affect the operations of AIM, including but not limited to Corporate Alliance Partners.
- Family members, friends, and other employees.

Nature of Potential Conflicting Interest

A potential conflicting interest is any interest—direct or indirect—with any person or entity mentioned above. Such an interest might arise through:

- Owning stock or holding debt or other proprietary interests in any third party dealing with AIM.
- Holding office, serving on the board, participating in management, or being otherwise employed (or formerly employed) in any third party dealing with AIM
- Receiving remuneration for services with respect to individual actions involving AIM.
- Using AIM's time, personnel, equipment, supplies, or good will for other than AIM approved activities, programs, and purposes.
- Holding office, serving on the board, participating in management, or being otherwise employed (or formerly employed) or involved in any project, product, issue, or business endorsed or supported by AIM.
- Receiving personal gifts or loans from third parties dealing with AIM. Receipt of any gift is disapproved, except gifts of nominal value, which could not be refused without discourtesy. No personal gift of money should ever be accepted.

Interpretation of This Statement of Policy

The areas of conflicting interest listed in “Areas in Which Conflict May Arise” and the relations in those areas which may give rise to conflict, as listed in “Nature of Potential Conflicting Interest,” are not exhaustive. Conceivably, conflicts might arise in other areas or through other relations. It is assumed that Covered Persons will recognize such areas and relations by analog.

The fact that one of the interests described in “Nature of Potential Conflicting Interest” exists does not mean necessarily that a conflict exists, or that the conflict, if it exists, is material enough to be of practical importance, or if material that upon full disclosure of all relevant facts and circumstances that it is necessarily adverse to the interests of AIM.

However, it is the policy of the Executive Committee that the existence of any of the interests described in “Nature of Potential Conflicting Interest,” shall be disclosed before any action is consummated. It shall be the continuing responsibility of any Covered Person to scrutinize his or her actions and outside business interests and relationships for potential conflicts and to immediately make disclosures of such interests as described below under “Disclosure Policy and Procedure.”

Disclosure Policy and Procedure

Disclosures of any potential conflicting interest of any Covered Person should be made according to the following procedures.

Disclosure of any potential conflicting interest shall be made by any Covered Person and may be made by any other interested party. The disclosure shall be made to the executive director (or if she or he is the one with the potential conflicting interest, then to the AIM chair). The executive director (or the AIM chair) shall make an initial determination whether a conflict exists and is material, and if the matters are material, bring them to the attention of the Executive Committee.

The Executive Committee shall make the final determination whether a conflict exists and is material. If the Executive Committee determines that there is an existing material conflict, the Executive Committee shall determine whether the contemplated action may be authorized in accordance with the standards stated below. The decision of the Executive Committee on these matters will rest in their sole discretion, and their concern must be the welfare of AIM and the advancement of its purpose.

- The action is fully disclosed in the financial statements of the organization;
- The Covered Person with the material conflict of interest is excluded from the approval of such action (and the discussion if requested by any Executive Committee member); and
- The Executive Committee makes a specific determination that the action is just, fair, and reasonable and in the best interests of AIM.