

CONFLICT OF INTEREST POLICY

The integrity of AME and its activities depends on avoiding actual, potential and apparent conflicts of interest by the individuals involved. At the same time, AME recognizes that its leaders, volunteers, staff, and others directly involved in its activities also have significant professional, business and personal interests and relationships.

AME has determined that the most appropriate way to address actual, potential or apparent conflicts of interest is initially through liberal disclosure of any relationship or interest which might be considered a conflict. **Disclosure under the Policy should not be seen as creating a presumption of impropriety or as automatically precluding someone from participating in an AME activity or decision-making process.** Rather, requiring individuals to disclose actual and potential conflicts recognizes that many factors can influence one's judgment and reflects AME's desire to make as much information as possible available to other participants in AME-related matters.

Any individual involved in an AME activity or decision-making process must disclose any conflicting or potentially conflicting personal, professional or business interests he or she may have, directly or indirectly, with the affected activity or decision. Such interests may relate to AME's programs and services (e.g., educational courses) or its operations (e.g., contracts with third parties).

In particular, participants in AME-related activities must disclose the positions they hold or relationships they have within AME and with other organizations or entities that may conflict, directly or indirectly, with their AME activities. They also must disclose any significant financial interest in, or other relationship with, an entity having a "commercial interest" in the activity or in its outcome. A commercial interest may exist (1) where the entity's products or services are under consideration by AME; (2) where the entity's products or services compete or potentially compete with those under consideration; or (3) where the entity's products or services may be affected by the activity or outcome. Disclosure of such interests assures that the Board of Directors or its designee(s) can better determine whether the participant may have an interest that conflicts with the interests of AME.

Although AME primarily is concerned with conflicts of interest of individuals participating directly in AME-related activities, conflicts of interest also may arise if someone with whom the participant directly shares income (e.g., a spouse, minor child, or business partner) or a third party whose interest may affect the participant's decision-making (e.g., a sibling or adult child) has an interest or relationship similar to one described above. As a result, participants should disclose not only their own interests or relationships but also those of their spouse, domestic partner or minor children. In addition, participants should disclose interests or relationships of others that may affect their decision-making, but only to the extent they are aware of such information.

All participants in AME-related activities must comply with the AME Conflict of Interest Policy. The disinterested (i.e., those who do not have a conflict) members of the Board or its designees are responsible for interpreting and applying this Policy. Because the Policy is stated in general terms, the Board or appropriate designee(s) should use their best judgment in implementing the Policy.