



Conflict of Interest Policy

This Conflict of Interest Policy of ISSM: (1) defines conflicts of interest; (2) identifies classes of individuals covered by this policy; (3) facilitates disclosure of information that may help identify conflicts of interest; and (4) specifies procedures to be followed in managing conflicts of interest.

1. Definition of conflicts of interest. A conflict of interest arises when a person in a position of authority over ISSM may benefit financially from a decision he or she could make in that capacity, including indirect benefits such as to family members or businesses with which the person is closely associated. This policy is focused upon material financial interest of, or benefit to, such persons.

2. Individuals covered. Persons covered by this policy are ISSM's officers, directors, committee members, and staff who are in positions of authority over an allocation of ISSM's resources.

3. Facilitation of disclosure. Persons covered by this policy will annually disclose or update to ISSM their interests that could give rise to conflicts of interest, such as a list of family members, substantial business or investment holdings, and other transactions or affiliations with businesses and other organizations or those of family members. The conflict of interest statement is attached to this policy.

4. Procedures to manage conflicts. For each interest disclosed to ISSM, the president will determine whether to: (a) take no action; (b) assure full disclosure to the Board of Directors and other individuals covered by this policy; or (c) ask the person to recuse himself or herself from participation in related discussions or decisions within ISSM. ISSM will monitor proposed or ongoing transactions for conflicts of interest and disclose them to ISSM governing body in order to deal with potential or actual conflicts, whether discovered before or after the transaction has occurred.