



AVAC CONFLICT OF INTEREST POLICY

AVAC shall avoid any conflicts of interest in its programs and in its organizational operations. Just as important, it wants to avoid any appearance of such conflicts where possible. An actual or potential conflict of interest occurs when a staff member (which shall include full and part time employees) is in a position to influence a decision that may result in a personal gain for that staff member or for a member of his/her immediate family (defined below) as a result of AVAC's business dealings. The following guidelines are designed to reveal any real or perceived conflicts of interest before they can become harmful to AVAC.

A staff member will not serve as a director, employee, committee member, or consultant, or in any other formal capacity (paid or unpaid) to AVAC vendors or AVAC grantees unless he or she receives prior written approval from the Executive Director or President of the Board.

Staff members shall prospectively disclose in writing to the Executive Director, his or her intention to enter into any service as a director, committee member, or consultant, or in any other formal capacity (paid or unpaid) to any organization or group whose activities include HIV prevention research advocacy. These relationships shall be subject to the approval of the Executive Director.

A staff member or a member of his or her immediate family are prohibited from any direct or indirect material benefit from any grant, financial, or other decision made by AVAC. An immediate family member includes an individual's spouse, domestic partner, parents, grandparents, siblings (whether whole or half-blood), children (whether natural or adopted), grandchildren (whether natural or adopted), great grandchildren (whether natural or adopted), and spouses of siblings, children, grandchildren and great grandchildren. The terms children, grandchildren, and great grandchildren include those of the individual's current spouse or domestic partner.

A staff member should have no business dealings with AVAC beyond receipt of salary and fringe benefits and reimbursement of authorized expenses.

A staff member should accept no gifts (except those valued less than \$25), honorary degrees, awards, fees, loans or honoraria arising from his/her work with AVAC. This restriction shall not preclude third party reimbursement to AVAC for travel, meal, lodging, service and other payment of expenses for costs associated as a staff member's work with AVAC. Loans to staff members from financial institutions, which do business with AVAC, are permissible as long as the loans are made on prevailing terms and conditions.

Buying or selling securities of any company using non-public information obtained in the performance of a staff member, or providing such information so obtained to others is prohibited.