

Global Nutrition Initiative

Conflict of Interest Policy

Purpose

The purpose of this Conflict of Interest Policy is to protect the interests of Global Nutrition Initiative (GNI), a nonprofit organization based in California, when it is contemplating entering into a transaction or arrangement that might benefit the private interest of an officer, director, or employee of the organization. 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.

Audience

This policy applies to all members of the leadership, board of directors, and employees of GNI.

Definition of Conflicts of Interest

A conflict of interest arises when a person in a position of authority over the organization may benefit personally from a decision he or she could make. This includes, but is not limited to:

- Having a financial interest in any entity with which GNI is engaged in business or fundraising activities.
- Engaging in activities that are competitive with the organization's mission.
- Accepting gifts, loans, or money from vendors, donors, or others doing business with GNI that could influence decision-making.

Expected Code of Conduct

All officers, directors, and employees of GNI are expected to act with integrity, honesty, and in the best interests of the organization. They must avoid any situation that could result in a conflict of interest or the appearance of a conflict.

Disclosure of Potential Conflicts

Any individual covered under this policy must disclose any potential or actual conflicts of interest to the board of directors. Disclosure must be made at the earliest possible opportunity and must be documented in the organization's records.

Addressing Conflicts of Interest

When a potential conflict of interest is disclosed, the board of directors will take the following steps:

1. Review: The board will review the potential conflict of interest and determine whether it poses a material conflict.
2. Recusal: The individual with the conflict may be asked to recuse themselves from discussions and decisions related to the conflict.
3. Action: If the board determines that a conflict exists, it will take appropriate action to address the conflict, which may include terminating the relationship, contract, or transaction at issue.
4. Documentation: All decisions regarding conflicts of interest will be documented in the organization's minutes.

Acceptance of Gifts, Loans, or Money

To avoid conflicts of interest, employees, officers, and directors of GNI are prohibited from accepting gifts, loans, or money from any individual or organization that may influence, or appear to influence, their decision-making within the organization. Any exceptions to this rule must be approved by the board of directors.

Protection of Confidential Information

All officers, directors, and employees must protect the confidentiality of any proprietary information related to GNI, its donors, and the individuals it serves. Confidential information may not be disclosed or used for personal gain or for the benefit of others outside the organization.

Acknowledgment and Signature

I have read and understand the Conflict of Interest Policy of Global Nutrition Initiative. I agree to comply with this policy and to disclose any potential conflicts of interest as required. I understand that failure to comply with this policy may result in disciplinary action, including possible termination of employment or removal from my position.