

AIM at Melanoma Conflict of Interest Policy

I. Overview

1. Purpose

The purpose of this conflict of interest policy is to protect AIM at Melanoma's interests when it is contemplating entering into a transaction or arrangement that might benefit the private interests of a director or employee, of AIM at Melanoma or might result in a possible excess benefit transaction.

2. Why is a policy necessary?

As a nonprofit, charitable organization, AIM at Melanoma is accountable to both government agencies and members of the public for responsible and proper use of its resources. Directors and employees have a duty to act in AIM at Melanoma's best interests and may not use their positions for their own financial or personal benefit.

Conflicts of interest must be taken very seriously since they can damage AIM at Melanoma's reputation and expose both AIM at Melanoma and affiliated individuals to legal liability if not handled appropriately. Even the appearance of a conflict of interest should be avoided, as it could undermine public support for AIM at Melanoma.

3. To whom does the policy apply?

This policy applies to all directors and employees.

II. Identifying Conflicts of Interest

1. What is a conflict of interest?

A potential conflict of interest arises when a director or employee or that person's relative or business (a) stands to gain a financial benefit from an action AIM at Melanoma takes or a transaction into which AIM at Melanoma enters; or (b) has another interest that impairs, or could be seen to impair, the independence or objectivity of the director or employee in discharging their duties to AIM at Melanoma.

2. A potential conflict is not necessarily a conflict of interest. A person has a conflict of interest only if the Board of Directors decides, pursuant to Section IV of this policy, that a conflict of interest exists.

III. Disclosing Potential Conflicts of Interest

1. A director or employee must disclose to the best of his/her knowledge all potential conflicts of interest as soon as he/she becomes aware of them.

IV. Determining Whether a Conflict of Interest Exists

1. After there has been disclosure of a potential conflict, the Board of Directors shall determine whether there is a conflict of interest.

V. Minutes and Documentation

1. The minutes of any Board meeting at which a matter involving a conflict of interest or potential conflict of interest was discussed or voted upon shall include:
 - a. the name of the interested party and the nature of the interest;
 - b. the decision as to whether the interest presented a conflict of interest;
 - c. any alternatives to a proposed contract or transaction considered by the Board; and
 - d. if the transaction was approved, the basis for the approval.

VI. Prohibited Acts

1. AIM at Melanoma shall not make a loan to any director or officer.