

CONFLICT OF INTEREST POLICY

This **Conflict of Interest Policy** of Health Talents International, Inc. (HTI): (1) defines conflicts of interest; (2) identifies classes of individuals within HTI 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 may arise when a person in a position of authority over HTI may benefit financially from a decision he or she could make in that capacity of authority, including indirect benefits such as to family members, friends or businesses with which the person is closely associated or any violation of protocol for admission or services.
2. **Individuals covered.** Persons covered by this policy are HTI's Board of Directors & Officers, President/Executive Director, and other Management staff.
3. **Facilitation of disclosure.** Persons covered by this policy will annually disclose or update to the President of the Board of Directors on a form provided by HTI their interests that could give rise to conflicts of interest, such as a list of family members, substantial business or investment holdings and other organizations or those of family members.
4. **Procedures to manage conflicts.** For each conflict disclosed to the President of the Board of Directors, 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; (c) ask the person to recuse from participation in related discussions or decisions within HTI; (d) ask the person to resign from his or her position at HTI or, if the person refuses to resign, become subject to possible removal in accordance with HTI removal procedures. The HTI Executive Director will monitor proposed or ongoing transactions for conflicts of interest and disclose them to the President of the Board of Directors in order to deal with potential or actual conflicts, whether discovered before or after the transaction has occurred.

By my signature below I agree to comply with the Conflicts of Interest Policy. I understand that Health Talents International is charitable and in order to maintain its federal tax exemption it must engage primarily in activities which accomplish one or more of its tax-exempt purposes.

Print Name

(Check one)

- () Board Member/Officer
- () Executive Director
- () Management Staff

Signature

Date

