

ACP DISCLOSURE OF INTERESTS POLICY FOR ELECTED MEMBERS OF THE BOARD OF DIRECTORS

Full Disclosure Declaration

As a Board Member of the American College of Phlebology you must insure balance, independence, objectivity, and ethical rigor in all of the board's activities. Therefore, the Board of Directors has adopted the concept of implementing a Full Disclosure Policy for Board Members. When performing the board's work, it is imperative that all members be aware of their colleagues' external interests and potential conflicts. The formal disclosure provides transparency to our membership and demonstrates that the board is acting with due diligence.

The intent of this disclosure is not to prevent a board member with a significant financial or other relationship from serving on the board, but rather to provide fellow board members and management with full disclosure of potential conflicts of interest.

Criteria for Disclosure of Conflicts of Interest

Board members are required to disclose to the ACP financial relationships they have with commercial interests of any amount during the past 12 months ONLY. A commercial interest is defined as any entity producing, marketing, re-selling, or distributing health care goods or services consumed by, or used on, patients. Relationship with governmental agencies and organizations that do not fit the above definition do not have to be disclosed. A list of possible commercial interests includes, but is not limited to:

1. Pharmaceutical companies,
2. Biomedical device manufacturers,
3. Other corporations whose products or services are related to the subject matter of the board's business, and
4. Any commercial supporters of any activity that may have a direct bearing on the subject matter discussed at board meetings. Significant financial interest or other relationships can include such things as grants or research support, employee, consultant, stockholder, member of speakers' bureau, honoraria or travel expense reimbursements, etc.

Also, you must disclose SIGNIFICANT* financial relationships your spouse or life partner has with applicable manufacturers, or provides marketing advice to applicable manufacturers. Disclosure of spousal information should be included in your disclosure in the table on the attached form.

(*“Significant” for spouses or life partners means, for example, holder of a patent, or is employed by a manufacturer you reference.)

ACP Record Keeping

The Executive Director of the ACP will maintain a file which shall include a Full Disclosure Statement obtained from each board member elected to the Board of Directors, and for the Executive Director (see disclosure statements [Sections I & II] on the attached form). Copies of these forms will be published in each board book sent to board members.

You are asked to sign each section separately. Complete and ***sign*** those parts which apply to you. All Board Members must read and ***sign*** Section II, regardless of their financial or product disclosures.

Procedure to Update Disclosures

ACP Headquarters will send each board member a form on which to update their disclosures twice annually. However, if new conflicts arise between Board meetings, it is your responsibility to update this form and submit revisions to ACP Headquarters.