

**GLOBAL ALLIANCE ON HEALTH AND POLLUTION  
CONFLICT OF INTEREST POLICY  
Adopted on 17 January 2020**

**Article 1. Introduction**

The Global Alliance on Health and Pollution (*GAHP*) and its leadership and staff are subject to legal requirements relating to conflicts of interest.

This Conflict of Interest Policy (the *Policy*) is intended to manifest and facilitate compliance with these principles and the law, to protect the integrity of GAHP's decision-making process, and to enable its stakeholders to have confidence in the organisation's integrity. This Policy establishes guidelines, procedures, and requirements for:

- (i) identifying a conflict of interest and situations that may result in an actual, potential, or perceived conflict of interest; and
- (ii) appropriately managing a conflict of interest in accordance with legal requirements and the goals of accountability and transparency.

This Policy applies to all GAHP Board Members, officers, employees, and members of an Advisory or Standing Committee (collectively, *Insiders*). All Insiders must familiarize themselves with and adhere to the principles and rules set out in this Policy.

**Article 2. Conflicts of Interest**

- (a) **Policy Statement.** It is GAHP's policy that any conflicts of interest, or apparent or potential conflicts of interest and all material facts related to such conflicts, be fully disclosed before a decision is made on the matter involved, and that Insiders will not be permitted to participate (other than by providing information) in any decision in which he or she has a conflict of interest. GAHP will not participate in any self-dealing transaction prohibited by law.
- (b) **Conflict of Interest Defined.** A conflict of interest exists if an Insider is in a position to make or influence GAHP's decisions about whether and how to proceed with a proposed transaction or arrangement with any entity or person vendor, supplier, lender, lessor, consultant, or other person, and has an Affiliation (defined below) with the other party to the transaction or arrangement (a *Conflict of Interest*).

Affiliation is the close involvement of an Insider or a family member (spouse, domestic partner, parent or other ancestor, child or other descendent, brother, sister or in-law) of an Insider as an actual or potential owner, investor, board member, director, employee, or service provider of or to the other party.

(c) **Requirements**

- (i) **General Compliance.** Each Insider should avoid any Conflict of Interest or appearance of conflict. Each Insider will disclose affiliations and comply with the decision-making procedures described in this Policy.

- (ii) **Duty to Disclose – Annual Disclosure Questionnaire.** Upon election, hiring, or appointment, and annually thereafter, Insiders should complete an Annual Disclosure Questionnaire in the form provided by GAHP in Schedule I attached to this Policy. On this Annual Disclosure Questionnaire, the Insider should disclose affiliations that constitute or could result in a Conflict of Interest and confirm his or her commitment to compliance with this Policy. The Insider should update this disclosure as appropriate. Insiders have a continuing responsibility to review their business, personal, and philanthropic interests, and their family and other close relationships, for actual, apparent, or potential conflicts of interest with respect to GAHP.
- (iii) **Duty to Disclose – Conflicts of Interest as They Arise.** Insiders should promptly disclose any affiliations that constitute or could result in a Conflict of Interest in connection with any transaction or arrangement under consideration by GAHP. Insiders should disclose affiliations to other participants in the decision-making process whenever there is any doubt about whether disclosure is required.
- (iv) **Annual Board Review.** The GAHP Board (the *Board*) will perform an annual review of this Policy and amend the Policy as appropriate. In addition, the Board will perform an annual review of the Annual Disclosure Questionnaires received under this Policy and consider appropriate actions to promote compliance with the Policy.
- (v) **Failure to Disclose.** If the Board has reasonable cause to believe an Insider has failed to disclose actual or possible Conflicts of Interest, it shall inform the Insider of the basis for such belief and afford the Insider reasonable opportunity to explain the alleged failure to disclose.

If, after hearing the Insider's response and after making further investigation as warranted by the circumstances, the Board determines the Insider has failed to disclose an actual or possible Conflict of Interest, it shall take appropriate disciplinary and corrective action.

**(d) Procedures for Addressing a Conflict of Interest**

- (i) **General Policy.** GAHP will generally not engage in any transaction or arrangement that results in direct or indirect material economic benefit to any Insider. If the decision-maker believes that such transaction or arrangement may be in GAHP's best interests despite the conflict, the decision-maker must engage in a review of the transaction or arrangement by the Executive Director or the Board, as applicable and as described in this Policy.
- (ii) **Abstention from Decision-making.** In all situations calling for disclosure, the Insider should abstain from voting or otherwise participating in the decision other than by providing information requested by the disinterested decision-makers.
- (iii) **Review and Action.** With regard to an employee, the Executive Director will determine whether a Conflict of Interest exists, and

decide the appropriate response by GAHP, which may include referring the potential transaction or arrangement that involves an actual or apparent Conflict of Interest to the GAHP Board.

With regard to a Board Member or officer (or employee referred to the Board by the Executive Director), the Board may approve a decision, transaction or arrangement that involves an actual or apparent Conflict of Interest if the following steps are taken:

- (1) The Board gives the Insider the opportunity to disclose all material facts related to the Conflict of Interest.
  - (2) The Insider involved in the conflict leaves the room or the conference call, whichever is applicable, during the Board's consideration of the decision, transaction or arrangement.
  - (3) The Board may, if appropriate, appoint a disinterested person or committee to investigate the proposed transaction or arrangement.
  - (4) The disinterested Board Members compile and review all material facts regarding the decision, transaction or arrangement, and the Conflict of Interest.
  - (5) The disinterested Board Members determine after reasonable investigation that GAHP cannot obtain with reasonable efforts a more advantageous transaction or arrangement with a person or entity that would not give rise to a Conflict of Interest.
  - (6) The disinterested Board Members determine that the decision, transaction or arrangement is fair and reasonable to GAHP, for its own benefit and in its best interests, and they vote to approve the decision, transaction or arrangement by a majority of the Board Members then in office, not counting the votes of any interested Board Members.
  - (7) The Secretary of the Board (*Secretary*) (or some other Board Member or officer in the Secretary's absence) prepares complete minutes of the Board's consideration of the decision, transaction or arrangement, as specified below.
- (iv) **Records of Proceedings.** The minutes of Board meetings on Conflict of Interest transactions shall include:
- (1) The names of the persons who disclosed or otherwise were found to have an affiliation in connection with an actual or possible Conflict of Interest, the nature of the affiliation, any action taken to determine whether a Conflict of Interest was present and the Board's decision as to whether a Conflict of Interest in fact existed.
  - (2) The names of the persons who were present for discussions and votes relating to the transaction or arrangement, the content of

the discussion, including any alternatives to the proposed transaction or arrangement, and a record of any votes taken in connection with the proceedings.

**SCHEDULE 1  
GLOBAL ALLIANCE ON HEALTH AND POLLUTION (GAHP)  
CONFLICT OF INTEREST ANNUAL DISCLOSURE QUESTIONNAIRE**

- 1) Please list all corporations, partnerships, associations, other non-profit or charitable organizations or any other organization of which you are an officer, director, trustee, partner, or employee, and describe your affiliation with \_\_\_\_\_ such \_\_\_\_\_ entity.

Organization:

Position:

_____	_____
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

- 2) Are you aware of any other relationships, arrangements, transactions, or matters which could create a conflict of interest or the appearance of conflict? If so, please describe.

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

- 3) Do you or a member of your family have a family or business relationship with any elected official?

- No
- Yes. Please describe:

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**4) Are you, a family member, or your business interest in a position to influence GAHP's or other decisions in a manner that could lead, or appear to lead, to the personal financial gain or advantage to you, a family member or your business interest?**

No

Yes. Please complete the following:

List the name of the person or entity involved (e.g., your name, family member's name, business interests' name):

---

---

---

---

---

Describe the way in which the above could influence GAHP's or other decision-making:

---

---

---

---

---

I hereby certify that the information set forth above is true and complete to the best of my knowledge. I understand that this policy is meant to supplement good judgment, and I will respect its spirit as well as its wording. I have reviewed, and agree to abide by, the Global Alliance on Health and Pollution Conflict of Interest Policy that is currently in effect.

Signed: \_\_\_\_\_

Printed Name: \_\_\_\_\_

Position within GAHP: \_\_\_\_\_

Date: \_\_\_\_\_/\_\_\_\_\_/\_\_\_\_\_

**GLOBAL ALLIANCE ON HEALTH AND POLLUTION  
BOARD MEMBERS MINIMUM STANDARDS POLICY  
Adopted on 17 January 2020**

The Board of the Global Alliance on Health and Pollution (**GAHP**) shall be composed of individuals who have demonstrated significant achievements in business, education, the professions and/or public service. They must have the requisite education and/or experience to make a significant contribution to the deliberations of the Board. In light of the GAHP's mission, experience in pollution and health, environment, international aid, behavioural change, international affairs/business, communications and other relevant fields is of particular value. In addition, the membership of the Board should bring a broad range of experiences and backgrounds to the Board, and strive to achieve diversity (age, ethnicity, background), gender and regional balance. The overall ability, experience and clear commitment to GAHP's mission of individual Board candidates should determine their suitability.

The following attributes shall be considered as desirable in any candidate for Board Member:

**1. Leadership Experience**

A Board candidate must have extensive and relevant leadership experience, including an understanding of the complex challenges of leadership. An ideal Board candidate shall have gained this experience in one or more of the settings outlined below.

**2. Relevant Sector Experience**

Ideal Board candidates shall have gained their leadership experience in sectors directly relevant to GAHP's mission, or in professional disciplines pertinent to non-profit management or GAHP's key programmatic areas. This could include experience in one or more of the following:

- (a) **Senior Management Experience.** The Board candidate is or has been a founder, a senior staff person, equivalent of a Chief Executive Officer, Chief Operating Officer or other major operating or staff officer of a public agency, government, corporation, international organisation, multilateral development bank or not-for-profit organisation or other agency, with a background in pollution, health, environment, international affairs, marketing, finance and/or business operations or other relevant area.
- (b) **Industry/Professional/International Experience.** The Board candidate has professional or high level educational experience in low- and middle-income countries or in the fields of pollution, health, environment or other complementary field, such as communications, marketing, finance etc.

**3. Corporate Governance**

The Board candidate should have sufficient applicable experience to understand fully the legal and other responsibilities of a board member of a not-for-profit organisation.

#### **4. Education**

Generally, it is desirable that a Board candidate should hold an undergraduate degree from an accredited college or university. In some cases, it is further desirable for the candidate also to have earned a masters or doctoral degree. These educational criteria are not meant to exclude an exceptional candidate who does not meet these educational criteria.

#### **5. Personal**

The Board candidate should be of the highest moral and ethical character, and be highly regarded and respected by others. The candidate must exhibit independence, objectivity and be capable of serving as a representative of a GAHP Council constituency (if applicable). He/she should be a conscientious steward who is as interested in developing the organisation while promoting its activities and have demonstrated a personal commitment to areas aligned with GAHP's mission.

- (a) Individual Characteristics.** The Board candidate should have the personal qualities to be able to make a substantial active contribution to Board deliberations. These qualities include intelligence, self-assuredness, a high ethical standard, inter-personal skills, independence, courage, a willingness to ask the difficult question, communication skills and commitment to the mission of GAHP. He/she should have vision but also be flexible to the possibilities of change, as well as possess strategic thinking skills, problem solving skills, leadership skills or an understanding of effective management techniques.

He/she should also be an influential member of his/her profession, field and/or global community or have a network with such individuals, especially relationships/networks that aid in raising funds.

#### **6. Availability and Engagement**

The Board candidate must be willing to commit sufficient time in order to fulfil the duties of Board membership, including at minimum attending Board meetings.

#### **7. Compatibility**

The Board candidate should be able to develop a good working relationship with other Board Members and contribute to the Board's working relationship with the senior management of GAHP.



**GLOBAL ALLIANCE ON HEALTH AND POLLUTION  
COUNCIL MEMBERSHIP POLICY  
Adopted on 17 January 2020**

**Article 1. Scope**

This Council Membership Policy applies to all current and prospective members of the GAHP Council of the Global Alliance on Health and Pollution (*GAHP*). The purpose of this Council Membership Policy (the *Policy*) is to outline the eligibility to and the process for joining the GAHP Council as members or observers.

**Article 2. Membership in the GAHP Council**

- (a) Eligibility.** Stakeholders who meet the following criteria outlined in this Policy are invited to participate in GAHP and are eligible to become members (*GAHP Council Members*) of or observers (*Observers*) to the GAHP Council:
- (i) have taken concrete action, shown leadership and/or are interested to join a global collaborative non-confrontational approach to resolve the issues of toxic pollution and its adverse health impacts;
  - (ii) actively support or wish to support GAHP's purpose, objectives and activities; and
  - (iii) do not meet any of the exclusionary criteria listed in Article 4.
- (b) Constituency Groups.** Stakeholders may join the GAHP Council as part of one of the following constituency groups:
- (i) Donor States (including, with the approval of the relevant competent authorities, where appropriate, sub-national and local authorities and governmental agencies) and regional economic integration organisations, including, in each case, their development agencies and development financing institutions or other departments;
  - (ii) Low- and middle- income countries (including, with the approval of the relevant competent authorities, where appropriate, sub-national and local authorities and governmental agencies);
  - (iii) Intergovernmental organisations;
  - (iv) Multilateral development banks;
  - (v) Civil society; or
  - (vi) Private sector.
- (c) Observers to the GAHP Council.** Stakeholders who meet the eligibility criteria but have constraints which do not allow them to join as GAHP Council Members, may be admitted to the GAHP Council as Observers. Observers have no voting rights but may attend and participate in meetings of the GAHP Council. When invited, Observers may also advise the GAHP Board or

Secretariat, serve on GAHP Committees, and/or participate in GAHP activities.

### **Article 3. Process and Requirements for Joining**

- (a) **Application for GAHP Council Members or Observer.** The following is the process for accepting new Observers or members to the GAHP Council:
- (i) States, regional economic integration organisations, multilateral development banks and intergovernmental organisations who actively support GAHP's objectives and purpose and meet all other eligibility criteria have the right to become GAHP Council Members or Observers as provided in the Statutes and Regulations. In order to request membership, the stakeholder must submit a formal letter or email to the Secretariat stating its intent to join and naming a contact person. Membership or Observer status is confirmed upon the Secretariat's formal acknowledgement.
  - (ii) All other stakeholders *must be approved by the GAHP Membership Committee*. Stakeholders seeking approval to become GAHP Council Members or Observers through the GAHP Membership Committee shall submit a formal letter to the Secretariat. The letter should express their interest in and outline how they wish to contribute to GAHP's objectives and purpose, supplemented by appropriate supporting evidence such as but not limited to: annual reports, reports to donors, and/or audited financial statements.
- (b) **Screening.** For stakeholders seeking to join the GAHP Council as members or Observers under Article 3(a)(ii) herein, the Secretariat shall be responsible for conducting a pre-screening due diligence assessment in order to confirm the applicant's intent, relevance and potential for contribution to GAHP's objectives and purpose. Screening may include review of the stakeholders' policies and compliance systems regarding responsible leadership, ownership, and management; adherence to human rights; good governance and labour standards; protection of the environment and community health; and product safety. The Secretariat shall present its findings to the GAHP Membership Committee, which shall be responsible for making the final decision on acceptance of an interested stakeholder as a GAHP Council Member or Observer.
- (c) **Financing.** Initially, there is no requirement for GAHP Council Members or Observers to contribute to the running cost of the GAHP Council. It is anticipated, however, that the GAHP Council will be self-funded and the Board will, from time to time, set criteria for financial contribution by the GAHP Council Members and Observers, the size of which will be in relation to means or capacity to pay.
- (d) **Designation of Contact Person.** GAHP Council Members or Observers shall designate a contact person to coordinate on their behalf.
- (e) **Activities.** It is expected that GAHP Council Members will contribute to one or more of the following activities:

- (i) Actively participate in GAHP Committees, GAHP Council meetings or (if appointed) the GAHP Board (usually via video/teleconference);
- (ii) Review GAHP updates and annual reports;
- (iii) Respond to GAHP inquiries and provide feedback;
- (iv) Forward information and messages about GAHP and its activities to relevant colleagues in their respective agencies and networks;
- (v) Participate as relevant in GAHP activities, including Health and Pollution Action Planning (HPAP) processes, GAHP outreach events and initiatives;
- (vi) Share technical knowledge, expertise and experience that may be pertinent to GAHP objectives and activities;
- (vii) Advocate internally to bring greater awareness of the impacts and effects of pollution (including disease) as well as at other appropriate occasions, for example, conferences, meetings, seminars; or
- (viii) Explore options for mobilising financial assistance for projects that address pollution in low- and middle-income countries and for dealing with emergencies.

#### **Article 4. Exclusionary Criteria**

Stakeholders involved in any of the following activities may not join the GAHP Council as Members or Observers:

- (a) Manufacture, sale or distribution of armaments and/or weapons or their components, including military supplies and equipment, or replica weapons marketed to children;
- (b) Manufacture, sale or distribution of tobacco or tobacco products, illegal drugs, or pornography;
- (c) Violation of UN sanctions and the relevant conventions, treaties and resolutions, and inclusion in UN, USA or EU ineligibility lists or vendor sanctions lists;
- (d) Manufacture, sale or distribution of substances subject to international bans or phase-outs and wildlife or products regulation under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES);
- (e) Gambling including casinos, betting etc. (excluding lotteries with charitable objectives);
- (f) Violation of human rights or complicity in human rights violations; or
- (g) Use or toleration of force or compulsory labour or child labour.

**GLOBAL ALLIANCE ON HEALTH AND POLLUTION  
WHISTLEBLOWER POLICY  
Adopted on 17 January 2020**

**Article 1. Scope**

This Whistleblower Policy applies to all Board Members, officers, employees, volunteers, recipients and donors (*Stakeholders*) of the Global Alliance on Health and Pollution (*GAHP*). The purpose of this Whistleblower Policy (the *Policy*) is to: (a) encourage and enable GAHP Stakeholders to raise concerns regarding suspected illegal unethical conduct or practices or violations of GAHP's policies on a confidential and, if desired, anonymous basis, (b) protect GAHP Stakeholders from retaliation for raising such concerns, and (c) establish policies and procedures for GAHP to receive and investigate reported concerns and address and correct inappropriate conduct and actions.

**Article 2. General Policy**

- (a) **Reporting Responsibility.** GAHP is committed to facilitating open and honest communications concerning its governance, finances, and compliance with law and ethical principles. It is important that GAHP Stakeholders feel free to raise issues, in good faith and without fear of retaliation, concerning suspected unlawful or improper practices. Each GAHP Stakeholder has the responsibility to report in good faith any concerns about actual or suspected violations of GAHP's policies or any law or regulation governing GAHP's operations (*Concern*). These matters include, without limitation, suspected fraud, theft, or embezzlement; accounting, internal controls, or auditing irregularities such as undocumented transactions or misleading financial reporting; improper financial transactions or use of GAHP assets; kickbacks or bribery; improper concealment or destruction of GAHP records, violations of GAHP's Conflicts of Interest Policy; and violations of law. GAHP encourages reporting issues of concern in accordance with this Policy.
- (b) **Acting in Good Faith.** Anyone reporting a Concern must act in good faith and have reasonable grounds for believing the information disclosed indicates a violation of law and/or ethical standards. GAHP Stakeholders who report in good faith, even if the allegations are, after an investigation, not substantiated, are protected under this Policy. Any unfounded allegation that proves to have been made maliciously or knowingly to be false will be viewed as a serious offense and may result in disciplinary action, including termination.

**Article 3. Reporting a Concern**

If at any time a GAHP Stakeholder has a Concern regarding the propriety or legality of any action, whether contemplated to be taken or that has been taken by a GAHP Stakeholder, or if he or she believes an action needs to be taken in order for GAHP to be in compliance with law, policy, or appropriate ethical standards, the Stakeholder should report the Concern. The Stakeholder may raise the issue directly by speaking

with any Board Member, the Executive Director, or Chair of the Board. GAHP will investigate anonymous reports to the extent possible.

**Article 4. Confidentiality**

GAHP encourages anyone reporting a Concern to identify himself or herself in order to facilitate the investigation. However, Concerns may be submitted on a confidential and/or anonymous basis. GAHP shall take reasonable steps to protect the identity of the GAHP Stakeholder, and shall keep reports confidential to the extent possible, consistent with the need to conduct an adequate investigation. Reporting individuals are expected to cooperate in internal investigations of misconduct and to provide truthful information in connection with any official inquiry or investigation.

**Article 5. Non-Retaliation**

A Stakeholder reporting a Concern will not be discharged, demoted, disciplined, threatened, harassed, or discriminated against for making a report in good faith under this Policy. This protection extends to GAHP Stakeholders who report in good faith, even if the allegations are, after an investigation, not substantiated. Any Stakeholder who retaliates against an individual for reporting or participating in an investigation of illegal or improper activity may be subject to disciplinary action.

**Article 6. No Impact on Employment Status**

This Policy is not an employment contract and does not modify the employment relationship between GAHP and its employees.

**GLOBAL ALLIANCE ON HEALTH AND POLLUTION  
RECORD RETENTION POLICY  
Adopted on 17 January 2020**

**Article 1. Introduction**

The Global Alliance on Health and Pollution (**GAHP**) adopted this Record Retention Policy (the **Policy**) for the purposes of: (i) managing the storage, retention, and destruction of its records and complying with applicable laws governing potential civil and criminal liability, (ii) destroying Records (defined below) that do not need to be or no longer need to be retained, and (iii) establishing guidelines for GAHP and its personnel with respect to their responsibilities regarding such Records. Failure to comply with this Policy may have adverse consequences, including inability to locate needed records and incurrence of excess storage costs.

**Article 2. General Policy**

GAHP is committed to maintaining complete, accurate, and high-quality records, including all documents, files, or writings (including electronic formats) created by any GAHP Board Members, officers, employees, volunteers, and agents within the scope of their duties to GAHP (**Records**). All GAHP Board Members, officers, employees, volunteers, and agents (**Personnel**) shall manage, protect, and maintain all Records in accordance with this Policy, usually for a specific amount of time. All Personnel must acknowledge that they have received, read, understood, and agreed to comply with this Policy, per the Record Retention Policy Acknowledgment in Schedule I.

Records generally contain information that serves as GAHP's organisational memory and has important business value (e.g., records of transactions, evidence of GAHP's rights or obligations). Records ensure operational continuity. The accidental or intentional destruction of these Records during the necessary retention period could result in consequences such as fines and penalties, loss of legal rights and privileges that the Records evidence, obstruction of justice charges, interference or spoliation of evidence, contempt of court charges, serious disadvantages in litigation, and reputational damage.

**Article 3. Types of Records**

A Record is any type of record, file, document, sample, and other form of information created, received, or transmitted in the course of GAHP's operations, regardless of physical format. Records may include, but are not limited to:

- (i) Tax exemption documents;
- (ii) Corporate governance documents;
- (iii) Tax returns;
- (iv) Financial records; or
- (v) Other records.

#### **Article 4. Default Retention Period**

All Records should be retained for the length of (i) the period that they are Active (as defined below) or (ii) the period specified in the Record Retention Schedule in Article 9 hereof. A Record is *Active* if:

- (i) There is a regulatory or statutory requirement to retain the Record;
- (ii) It is necessary or advantageous that GAHP be able to access the Record in the regular course of business;
- (iii) The Record will be needed for reference at a specific time in the future; or
- (iv) The Personnel maintaining the Record reasonably believe that the Record is Active.

#### **Article 5. Retention of Records Relevant to Legal Proceedings**

No Personnel may alter, destroy, mutilate, conceal, cover up, falsify, make a false entry in any Record or tangible object, or attempt to do so in each case, with the intent to impair the Record's integrity or availability for use in a Legal Proceeding, or to influence such Legal Proceeding. A *Legal Proceeding* means any investigation, civil or criminal litigation, official proceeding or any proper administration of any matter.

If GAHP learns of a claim that may give rise to a Legal Proceeding, Personnel will, by the Executive Director, be instructed to cease destruction of all Records to ensure safeguarding of Records relevant to the Legal Proceeding. Personnel may return to normal retention procedures upon being instructed to do so by the Executive Director in consultation with GAHP's legal counsel.

All Records relevant to or used in any Legal Proceeding should be retained for the length of (i) ten (10) years after the Legal Proceeding or (ii) the period specified in the Record Retention Schedule in Article 9 hereof.

#### **Article 6. Retention of Correspondence**

Electronic communications and other general correspondence, including email, pertaining to routine, short-term operations, or whose relevant substance has been incorporated into other, more authoritative Records, may be destroyed after receipt or transmission. All other electronic communications and other general correspondence, including email, should be retained according to the Record Retention Schedule in Article 9 hereof based on the subject matter of the communication.

#### **Article 7. Administration**

The Executive Director is responsible for administering this Policy. The Executive Director, in consultation with GAHP's tax advisor and legal counsel, may take actions intended to ensure that Records created or maintained by Personnel are stored or destroyed in a manner consistent with this Policy. The responsibilities of administering the Policy include, but are not limited to:

- (i) Identifying the records that GAHP must and should retain;
- (ii) Periodically reviewing this Policy and ensuring compliance;
- (iii) Training GAHP Personnel on their obligations under the Policy; and
- (iv) Modifying the Record Retention Schedule as needed to comply with changes in law and adding or revising Record categories to reflect changes in GAHP's operations.

**Article 8. Reporting Policy Violations**

GAHP is committed to enforcing this Policy as it applies to all forms of Records. The effectiveness of GAHP's efforts, however, depends largely on the compliance of its Personnel with the Policy. All reasonable suspicions that GAHP Personnel may have violated this Policy should be reported immediately to the Executive Director. If such inappropriate conduct is not reported, GAHP may not become aware of a possible violation of this Policy and may not be able to take appropriate corrective action. No one will be subject to, and GAHP prohibits, any form of discipline, reprisal, intimidation, or retaliation for reporting incidents of inappropriate conduct of any kind, pursuing any record destruction claim, or cooperating in related investigations.

**Article 9. Record Retention Schedule**

<b>Retain Permanently</b>
<b>Tax Exemption Documents</b>
Income tax exemption documents
Determination letters from the Swiss Federal Tax Administration or other governmental or regulatory body
Sales tax exemption documents
Correspondence with the Swiss Federal Tax Administration during the determination process
<b>Corporate Governance Documents</b>
Articles of Incorporation (and all amendments)
Minutes of the Board and committees (including all waivers of notice of meetings)
Board Member resignations
Annual corporate filings
Bylaws (and all amendments)
Resolutions and written consents
Records of any relationships with affiliated organisations
<b>Tax Returns</b>
Tax returns and schedules
Filings with the Department of Consumer and Regulatory Affairs
<b>Financial Records</b>
Audited and unaudited financial statements
Annual reports
<b>Other</b>
Real Property Leases



Records of donations, gifts and restrictions
Records supporting ownership of assets (e.g., deeds, patent and trademark records, capital stock records)
Insurance records

<b>Retain for Active Period, Plus Ten (10) Years</b>
<b>Financial Records</b>
Records supporting tax return income, deductions and credits
Revenue and expense records
Accounts payable and receivable records
Investment reports
Audit reports and work papers
Any other records relating to preparation of financial statements
Employee benefits records (e.g., pensions, group insurance records, benefit claims, benefits descriptions)
Contracts and memorandums of understanding
Budget and expense reports
Bank statements
General ledgers
Asset depreciation schedules
Grant records
Employment records (e.g., payroll records, employee applications, evaluations)
<b>Other</b>
Governance and other corporate policies
Grant records, applications, and contracts
Leases for real estate and equipment
Environmental audits
Fundraising records and materials
Litigation records
Records relating to loans
Employment and contractor agreements
Project records
Educational publications

**Article 10. Privacy**

The Executive Director must ensure that all retention and destruction procedures comply with any relevant privacy laws.

**Article 11. Questions about the Policy**

Any questions about this Policy should be directed to the Executive Director, who is in charge of administering, enforcing, and recommending updates to the Board for this Policy.

**SCHEDULE 1**  
**RECORD RETENTION POLICY ACKNOWLEDGMENT**

I, \_\_\_\_\_, acknowledge that on \_\_\_\_\_,  
I received a copy of Global Alliance on Health and Pollution's (**GAHP's**) Record Retention Policy (the **Policy**) and that I read it, understood it, and agree to comply with it. I understand that GAHP has the maximum discretion permitted by law to interpret, administer, change, modify, or delete this Policy at any time. I also understand that any delay or failure by GAHP to enforce any policy or rule will not constitute a waiver of GAHP's right to do so in the future. I understand that neither this Policy nor any other communication by management representatives or any other employee, whether oral or written, is intended in any way to create a contract of employment.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Printed Name

\_\_\_\_\_  
Date