



International Association of
Movers (IAM)

Procedures for Dispute
Resolution and Code of
Ethics Enforcement

Foreword

The International Association of Movers (IAM) is the moving and forwarding industry's largest global trade association. With more than 2,000 members, it comprises companies that provide moving, forwarding, shipping, logistics, and related services in more than 170 countries. Since 1962, IAM has been promoting the growth and success of its members by offering programs, resources, membership protections, and unparalleled networking opportunities to enhance their businesses and their brands.

IAM is the founder and manager of the IAM Dispute Resolution Process, the [IAM Code of Ethics](#), and the Code of Ethics Enforcement Procedures. This document sets forth the procedures for how IAM will process complaints for dispute resolution and ethics enforcement between IAM Members. Member requests made to IAM to intervene on undisputed debts owed by another member shall be administered according to the RPP Operating Rules and Regulations.

These procedures have been approved by the IAM Executive Committee as the entity that has general supervision over the business of IAM under the IAM By-Laws.

Introduction

As a global network of service providers bound together by a common affiliation, IAM Members trade and work together every day to serve the needs of their customers. Like with any commercial arrangement though, disagreements may arise from time to time. Unfortunately, in some cases, these disagreements may impact the transferee, which harms not just the reputation of both parties to the complaint but IAM and the global moving industry.

The International Association of Movers (IAM) Procedures for Dispute Resolution and Code of Ethics Enforcement (the “Procedures”) found herein provide a framework through which IAM Members can request support from the Association when disputes do occur with another Member. Whether the complaint involves an alleged breach of the IAM Code of Ethics or not, the Procedures first provide guidance on how to request support from IAM and who is eligible to request that support. The Procedures then specify how IAM Staff shall process a complaint and how IAM can provide support in these situations. Finally, the Procedures detail the disciplinary actions IAM can levy and the process to appeal decisions.

For non-ethical disputes, IAM recognizes the need to help our members resolve conflicts that may impact customers or delay needed payments. To assist members with dispute resolution, IAM will partner with an external alternative dispute resolution provider. By providing access to trained mediators through this external service, IAM connects Members to resources that can resolve previously intractable disputes.

For ethical disputes, the [IAM Code of Ethics](#) states the values to which our members are committed and embodies the ethical responsibilities of our profession. This Code is overseen by the IAM Ethics Council, which is a permanent institutional body of the IAM composed of volunteers from various IAM membership categories and geographic regions to provide a variety of experiences and industry knowledge to the Council.

In 2022, the IAM Executive Committee approved the expansion of the scope of IAM Ethics Council’s mission to include serving as subject matter experts on member disputes submitted to IAM that may not be breaches of the Code of Ethics.

TABLE OF CONTENTS

FOREWORD 2

INTRODUCTION..... 3

TABLE OF CONTENTS..... 4

I. SCOPE 5

II. GENERAL PRINCIPLES 5

III. DEFINITIONS..... 5

IV. FILING AN ETHICS COMPLAINT 7

V. PROCESSING THE COMPLAINT 7

VI. PROCEDURES TO RESOLVE DISPUTES 9

VII. PROCEDURES FOR ETHICS CASE REVIEW AND ENFORCEMENT 9

VIII. DISCIPLINE..... 12

IX. APPEALS 13

X. DISCLOSURE OF INFORMATION..... 14

XI. RE-ADMISSION TO IAM MEMBERSHIP..... 15

APPENDIX A: THE IAM CODE OF ETHICS 16

APPENDIX B: CONFLICT OF INTEREST POLICY..... 17

I. Scope

The International Association of Movers (IAM) Procedures for Dispute Resolution and Code of Ethics Enforcement specify processes that IAM shall follow when it receives a complaint from one Member alleging improper or unethical behavior from another Member.

II. General Principles

The International Association of Movers (IAM) shall administer these Procedures based on the following principles:

A. Documenting the Complaint

All notices, reports and decisions made under these Procedures shall be made in writing to create a record of receipt. A complaint may be [submitted online](#), via email, or mail to the IAM Staff Office.

B. Avoiding Conflict of Interest

Reviewers will be carefully selected to avoid any competitive motive or conflict of interest among all staff and volunteer individuals participating in the dispute resolution and code enforcement proceeding. To learn more, see the [IAM Conflict of Interest Policy](#) for more information.

C. Disclosure of Information and Confidentiality

Mediators, Ethics Council members, and IAM Staff who have been designated to provide administrative assistance to support the dispute resolution proceedings and Code of Ethics enforcement shall protect against unauthorized disclosures of confidential information (within their legal obligations).

III. Definitions

A. Adverse Party

The IAM member(s) allegedly responsible for causing or whose conduct is otherwise the subject of the complaint

B. Arbitration

A private process where disputing parties agree that one or several individuals can make a decision about the dispute after receiving evidence and hearing arguments¹

C. Case Review Panel

The Case Review Panel is appointed from at least three members of the IAM Ethics Council by the Ethics Council Chair in consultation with the IAM President or his / her designee. The Case Review Panel will review and render a judgement on an ethics case.

D. Complaint

Any alleged violation of the IAM Articles of Incorporation, By-Laws, the Professional Cooperation Guidelines (“PCGs”) or Code of Ethics.

E. Complainant

Any IAM Member Company and / or Individual Member in good standing who believes himself / herself / itself to be aggrieved by any action or omission of an IAM Member Company, IAM Member Companies, and/or Individual Member that violates the IAM Articles of Incorporation, By-Laws, the Professional Cooperation Guidelines (“PCGs”) or Code of Ethics

F. Dispute

A complaint accepted and advanced by the IAM President to IAM’s designated alternative dispute resolution provider

G. Ethics Case

A complaint accepted and advanced by the IAM President to the IAM Ethics Council Chairperson for further review by the IAM Ethics Council

H. Investigator

The IAM President shall serve as the Investigator with the assistance of the IAM Staff on the Review Task Force

I. Mediation

A private process where a neutral third person called a mediator helps the parties discuss and try to resolve the dispute²

J. Mediation Outcome

The end result of the mediation process (e.g., Resolved or Unresolved)

¹ Arbitration is different from mediation because the neutral arbitrator has the authority to make a decision about the dispute. Arbitration is not currently included in the scope of these dispute resolution procedures but may be added in the future.

² In a mediation, the parties have the opportunity to describe the issues, discuss their interests, understandings, and feelings; provide each other with information, and explore ideas for the resolution of the dispute.

K. Professional Cooperation Guidelines

A set of operating guidelines developed by the FIDI Global Alliance covering the entire move process, which can be accessed here: <https://iamovers.mobilityex.com/#/pcguidelines>

L. Review Task Force

The Review Task Force is the group established to process an ethics case once accepted by the Chairperson of the Ethics Council. It is composed of the [Case Review Panel](#), the Ethics Council Chairperson, and the IAM President.

IV. Filing a Complaint

A. How to File a Complaint

Any IAM Member Company ([the "Complainant"](#)) may file a complaint with IAM. The [complaint](#) shall:

1. Be submitted in writing online via IAM's complaint submission form or via mail or email to the IAM office
2. Be signed by an officer of the company that is an IAM member
3. Include the complainant's address, telephone number, email address, and shall set forth a contact person in the company for the complaint
4. Include a concise statement of the complaint, the names of the IAM member(s) allegedly responsible for, causing or whose conduct is otherwise the subject of the complaint ([the "Adverse Party"](#)), including if available any applicable names, addresses and phone numbers of the Adverse Party and all persons related directly to the occurrence
5. State the relief sought. If the Complainant is an entity, the Complainant shall designate one spokesperson or designated contact

If the Complainant is not a member in good standing, the complaint shall be dismissed by written communication by the IAM President.

B. Complaint Filing Limitations

Complaints shall be brought within two hundred and seventy (270) days after the cause arose. A cause arises upon the date the alleged violation occurs or the date on which, by the exercise of reasonable diligence, the Complainant should have become aware of the alleged violation, whichever is later.

V. Processing the Complaint

Upon receipt of a complaint, the IAM President, with the administrative assistance of the IAM staff, shall promptly undertake the following actions:

- A. The President shall make a preliminary determination that the complaint is directed against a Company and/or Individual Member of IAM and alleges an act or omission that could be a violation of the IAM Articles of Incorporation, [By-Laws](#), PCGs, or Code of Ethics.
- B. The President may seek additional information from the Complainant to make the preliminary determination.
- C. If it is determined that the Adverse Party is not an IAM member or the complaint is not a violation of the IAM Articles of Incorporation, By-Laws, PCGs, or Code of Ethics, the President or his/her delegate shall notify the Complainant that the IAM will not take jurisdiction of the complaint and the reason why it will not accept jurisdiction.
- D. The President may also wait or decline to take jurisdiction of the Complaint if the matter is also the subject of a complaint previously filed with either IAM or with an IAM-affiliated organization; or, if it is the subject of existing, current, or potential litigation. For information on how to appeal the President's decision, complainants may consult the [Appeals Section](#).
- E. Prior to accepting a complaint, the President may, in his or her sole discretion, elect to contact the Complainant and the Adverse Party to pursue a private settlement of the complaint.
 - 1. If the Adverse Party indicates a willingness to pursue a settlement of the complaint, the President may opt to hold the complaint for up to thirty (30) calendar days without progressing the complaint in order to give the parties an opportunity to reach a private settlement.
 - 2. If the parties reach a private settlement, the President shall close the matter without filing the complaint.
 - 3. If the parties do not reach a settlement at the end of the thirty (30) calendar day period; or, if one of the parties indicates to the President that a resolution cannot be reached prior to the expiration of the thirty (30) calendar day period, the President shall accept the complaint.
- F. If the complaint is accepted by the President, he or she shall determine whether the complaint shall be considered for dispute resolution (a ["Dispute"](#)) or ethics review (a ["Ethics Case"](#)). Disputes shall be processed as per Section VI of these procedures. Ethics cases shall be processed as per Section VII.

VI. Procedures to Resolve Disputes

- A. Upon acceptance for dispute resolution, IAM Staff shall notify both parties of the option to avail themselves of a mediation service to resolve this complaint.
- B. Should both parties agree to mediation, IAM Staff will initiate the mediation with IAM's external alternative dispute resolution provider. The mediation procedures of the external alternative dispute resolution provider shall prevail once a dispute has been forwarded for mediation.
- C. Should the external mediator require additional subject matter expertise, the Ethics Council Chairperson shall appoint a member of the IAM Ethics Council to serve in this capacity. The Ethics Council Member appointed shall not have a conflict of interest with either party.
- D. The external alternative dispute resolution provider shall report the [mediation outcome](#) to IAM and the Ethics Council Chair within seven business days. Details of any mediation settlement shall be kept confidential.
- E. IAM may utilize disciplinary actions specified in [Section VIII](#) and Section III of the RPP Operating Rules and Regulations.

VII. Procedures for Ethics Case Review and Enforcement

If the complaint is accepted by the President as an [ethics case](#), he or she shall turn the complaint over to the Chairperson of the IAM Ethics Council.

A. Ethics Council Chairperson Duties

The Chairperson of the IAM Ethics Council shall acknowledge in writing to the Complainant that the complaint has been accepted and inform the Complainant that the [Investigator](#) will be contacting the Complainant. A copy of these Procedures shall be sent with the notice.

The Chairperson of the IAM Ethics Council shall acknowledge in writing to the Adverse Party that a complaint has been filed against the Adverse Party and that the Investigator will be contacting the Adverse Party. A copy of the complaint and these Procedures shall be sent with the notice. The notice shall also be sent to the Investigator along with the relevant documentary evidence within thirty (30) days of the date of acceptance by the Chairperson.

B. Review Task Force Formation

If a complaint is accepted by the President, a **Review Task Force** shall be formed consisting of the following:

- Three (3) members of the IAM Ethics Council – The [Case Review Panel](#)
- The Ethics Council Chairperson
- The IAM President

The Ethics Council Chair shall appoint IAM Ethics Council Members to serve on the Review Task Force in consultation with the IAM President. Convening the Case Review Panel may occur after the Investigator and the Ethics Council Chair have tried to mediate a resolution to the Ethics Case (See [Section D](#) and [Section E](#))

C. Review Task Force Role and Responsibility

The role of the Review Task Force along with the IAM Staff is to process the Ethics Case according to these Procedures. The specific roles of the Review Task Force are as follows:

Chairperson

The Chairperson of the IAM Ethics Council will serve concurrently as the Review Task Force Chairperson.

Investigator

The IAM President will serve as the [Investigator](#) with the assistance of the IAM Staff .

Case Review Panel

The members chosen from the IAM Ethics Council will be assigned to the [Case Review Panel](#) of the Review Task Force in the event the Chairperson refers the ethics case to the Case Review Panel. The identities of the Case Review Panel shall not be disclosed to the parties involved in the Ethics Case.

D. Investigation and Report

The Investigator or his/her delegate shall contact the Complainant, the Adverse Party and any other persons having information related to the subject matter of the complaint.

1. The Investigator may attempt to mediate between the parties in order to obtain a resolution of the Complaint. If mediation is successful, the agreed-upon resolution must be in writing, signed by each of the parties and submitted to the Ethics Council Chairperson.
2. If mediation is not successful, the Investigator, after conducting the interviews and obtaining any written responses or documentary evidence submitted by the parties, shall draft a written summary of the facts of the case containing any relevant documentary evidence (the "Case Summary") and a separate written recommendation on the appropriate resolution of the complaint to the Chairperson (the Investigator's Recommendation). The Case Summary and Investigator's Recommendation shall be submitted to the Chairperson within sixty (60) days of the receipt of the complaint by the Investigator.

E. Preliminary Action by Chairperson

Within ten (10) days of the receipt of the Case Summary and Investigator's Recommendation, the Chairperson shall take one of the following actions on the complaint:

1. Attempt to mediate between the parties using any meeting format acceptable to the parties and the Ethics Council Chairperson. If mediation is successful, the agreed upon resolution must be in writing and signed by the Chairperson and each of the parties.
2. Refer it to a Case Review Panel (see Case Review Panel guide below)
3. If the Investigator's Recommendation finds that there is no probable cause to believe the Adverse Party violated the IAM Articles of Incorporation, By-Laws, Code of Ethics, and / or the Professional Cooperation Guidelines ("PCGs") and the Chairperson agrees, the Chairperson and Investigator will jointly inform the Complainant and the Adverse Party that the complaint is being dismissed, and provide each party with a copy of the Case Summary and Investigator's Recommendation. The Complainant would also receive notice of the right to appeal.

F. Case Review Panel Role and Responsibility

Once the Case Review Panel has been chosen, the Ethics Council Chairperson shall notify the Council that an Ethics Case was selected and who has been chosen to serve on the Case Review Panel. After formation, the Case Review Panel will elect, among the three members, its own Chairperson to lead the panel when making procedural decisions.

When possible, none of the three members selected for the Case Review Panel shall compete directly with the Complainant or Adverse Party; and, every effort shall be made to avoid conflicts in selecting the panel. If for any reason, a member of the panel cannot fulfill his or her duties or fill out a term for any reason, the Ethics Council Chair can replace that person with a new Ethics Council Member for the remainder of the unfulfilled term with the concurrence of the IAM President.

If any attempted mediation is unsuccessful or if the Ethics Council Chairperson deems mediation inadvisable, the Chairperson will then turn the complaint over to the Case Review Panel.

G. Case Review Panel Procedures

The Case Review Panel shall adhere to the following procedures:

1. The Case Review Panel will review the evidence and documentation that has been provided and make a determination whether it will be necessary to hold a hearing or not.
 - a. If the Case Review Panel determines that it is necessary to hold a hearing, then the Case Review Panel Chair will select the time and place for the hearing so as to have the hearing occur at the earliest convenient date. The Panel Chair may, at the Chair's option, conduct the hearing by conference call or other similar electronic means.
 - b. The Ethics Council Chairperson will communicate the information about the hearing schedule to the Complainant and Adverse parties.
 - c. Prior to the hearing, the Ethics Council Chairperson will provide to the Case Review Panel a copy of the Complaint, any written response previously

submitted by the Adverse Party, documents collected by the Investigator, and the Case Summary. The Case Review Panel may receive the Investigator's Recommendation. The Case Review Panel will not receive any statements or offers made by the Chairperson of the Ethics Council or any of the parties during mediation.

2. All procedural and evidentiary decisions shall be made by the Case Review Panel Chair.
 - a. Decisions regarding the merits of the complaint and the form of any discipline shall be made by majority vote of the Case Review Panel.
 - b. As soon as the Case Review Panel has finalized their decision, a copy will be forwarded to the Ethics Council Chair and IAM President.
 - c. The Case Review Panel shall report its decision on the merits in the form of written findings of fact, conclusions, and any discipline imposed within ten (10) days of the conclusion of the hearing (the "Panel Report").
 - d. The Panel Report, together with notice on the right to appeal, shall be sent by the Ethics Council Chair to the parties involved and the IAM Executive Committee.
 - e. The Ethics Council Chair shall also advise the Ethics Council of the final outcome from the Case Review panel.

The Decision of the Case Review Panel shall be final and binding on all parties, unless the decision is appealed in accordance with the procedures below.

VIII. Discipline

A. Disciplinary Actions

The Case Review Panel may decide to impose no disciplinary measures or its decision may be to impose one or more of the following disciplinary measures on the Complainant or Adverse Party:

1. Reprimand

A reprimand may be issued against the Adverse Party. The Case Review Panel may direct that the reprimand be private or public.

2. Probation

A ruling of probation that, for a specified time depending upon the circumstances of the violation, the Adverse Party's continued participation in IAM activities, member benefits, or membership programs is conditioned upon satisfaction of certain conditions. These conditions shall be described specifically, as shall the consequences of failing to meet them. The Case Review Panel may direct that the probation be private or public.

3. Suspension

A ruling that the Adverse Party is prohibited from participating in IAM activities, programs, and any other privileges of membership. The Case Review Panel may limit the effect of a suspension to certain benefits or programs, and may establish conditions that, if satisfied, will result in the lifting of a suspension.

4. Expulsion

A ruling that, either permanently or pending reinstatement, the Adverse Party's membership in IAM is terminated. The Case Review Panel may establish conditions that, if satisfied, will result in reinstatement. If a member is expelled, IAM shall not be required to refund or reimburse membership fees or dues.

It is the intent of the Enforcement Procedures that the range of disciplinary measures be as broad and flexible as possible so that disciplinary measures can be employed to remedy and redress the violation that has been committed. In dealing with violations committed by Company Members, the disciplinary measures may be tailored to address particular branch(es) owned by the Company Member or personnel employed by the Company Member who are responsible for the violation.

Any amendment to this section shall be subject to review and approval by the IAM Executive Committee.

B. Report of Suspension or Termination

If an Adverse Party's membership in IAM is suspended or terminated and such disciplinary measures are final and non-appealable, IAM shall publish notice of such membership suspension or termination in any IAM publication of general circulation among IAM membership and shall send notice of such suspension or termination to any applicable licensing board or certifying agency with jurisdiction over the Adverse Party.

IX. Appeals

A. Appealing the President's Decision

The Complainant shall receive notice of the right to appeal the President's decision. An appeal of the President's decision will be directed to the Chairperson of the IAM Ethics Council. Should the Chairperson concur with the President's decision, IAM will decline to take jurisdiction of the complaint.

If the Chairperson accepts the complainant's appeal, the Chairperson shall take the steps outlined in [Section V, Part F](#). In the event it is determined that the Chairperson of the IAM Ethics Council has a conflict of interest with any of the parties named in the complaint, the appeal will be directed onto the person occupying the following positions in the order specified until a person without a conflict of interest is identified:

1. Chairperson of the IAM Executive Committee
2. Vice-Chairperson of the IAM Executive Committee
3. In the event that there is still a conflict of interest, the IAM President will appoint a member of the IAM Executive Committee who does not have a conflict of interest with any of the parties named in the complaint.

B. Appealing the Chair's Decision

An appeal from a dismissal of the ethics case by the Chairperson or an appeal of the Case Review Panel's decision may be taken by any party to the IAM Executive Committee in the event that the appealing party can provide new information or documentation to support the appeal. If that is the case, the appeal shall be initiated and processed in the following manner:

1. A notice of appeal must be filed within thirty (30) days of the date of notice of the action being appealed.
2. The notice of appeal shall be in writing, must set forth the basis for the appeal, and shall be sent to the IAM President.
3. Upon receipt, the IAM President shall review the appeal and determine if the appealing party has provided new information or documentation to support the appeal. If the appealing party disagrees with the judgement rendered by either the Chairperson or the Case Review Panel and has not provided any new substantive information or documentation to support the appeal, the IAM President may dismiss the appeal as frivolous.
4. If the appeal is not dismissed by the IAM President, the IAM Staff will forward copies of the notice of appeal to the other party, who shall have the right to submit written responses to the appeal within thirty (30) days of receiving the notice of appeal. Any responses must be in writing and delivered to the IAM President.
5. The IAM President will then deliver to the Executive Committee the complete record of case, including the notice of appeal, and any responses submitted by the other party. The Executive Committee shall, by majority vote of all non-abstaining members and without considering new evidence or conducting additional hearings, render a decision with respect to the appeal.
6. A written notice of that decision shall be sent to all parties within ten (10) days of the Executive Committee decision. The decision of the Executive Committee with respect to an appeal shall be final and binding on all parties.

X. Disclosure of Information

Members of the Ethics Council and the IAM Staff shall utilize the following directives in the disclosure of information regarding ongoing and completed activities of the Ethics Council:

- A. If a Complaint has been filed and an investigation is on-going, that fact may be confirmed by the statement: *"A Complaint on this matter has been received and is under investigation; no further information may be released while the investigation is on-going."*
- B. If a Complaint has been dismissed without a finding of any violations by the Adverse Party, if a Complaint has been resolved by mediation, or if a Complaint is resolved by a finding that a violation has occurred, but either no discipline is imposed or the discipline imposed is not to be publicly disclosed, then the completion of the investigation shall be confirmed by the statement: *"The matter has been resolved and no further information may be released."*

- C. If the Complaint results in a finding of a violation and the imposition of disciplinary measures which are to be publicly disclosed, then that fact may be confirmed by the statement: *“The Ethics Council determined that [name of Adverse Party] committed a violation or violations of [name of section or sections] of the Code of Ethics and has imposed [description of discipline imposed] against [name of Adverse Party]. No other information regarding this matter shall be released by IAM.”* If needed, this format will also be used to notify any applicable licensing board or certifying agency with jurisdiction over the Adverse Party.

XI. Re-Admission to IAM Membership

If a member with a pending complaint chooses to withdraw from IAM membership before the complaint is finally resolved, the withdrawing member shall not be re-admitted into IAM membership until the complaint has been satisfactorily resolved. The Ethics Council Chairperson shall be notified by IAM of the former member’s request for re-admission into membership and shall establish the requirements for admission which shall include resolution of the complaint through any of the means available under these Enforcement Procedures. The former member may appeal any final action, concerning their re-admission, to the Chairperson of the IAM Executive Committee using the procedures set out in the Appeals section above.

Appendix A: The IAM Code of Ethics

- I. Members shall acknowledge and respect the cultural similarities and differences among all members.
- II. Members shall conduct business in a responsible and professional manner.
- III. Members shall deal fairly with all customers, Association Members, and other business entities.
- IV. Members shall adhere to policy of honesty and integrity in accordance with generally accepted principles of professional conduct.
- V. Members shall be forthright and truthful in their professional communications.
- VI. Members shall abide by all lawful agreements to which they are a party, including agreements with customers, the Association and Association Members.
- VII. Members shall honor their just obligations.
- VIII. Member shall strive to comply with all applicable laws and governmental regulations.
- IX. A member shall not compete unfairly with other members.
- X. Member shall refrain from engaging in any activity which discredits the Association or any of its members.

Appendix B: Conflict of Interest Policy

Whenever a volunteer or staff member of the International Association of Movers (IAM) has a conflict of interest with the disputes that are brought before the International Association of Movers (IAM), he or she shall call such conflict to the attention of the Ethics Council Chairperson and the IAM President.

After identifying the issue, matter, or transaction with respect to which a conflict exists, a council member with a conflict shall withdraw from any further involvement in that issue, matter, or transaction unless a majority of the disinterested council members shall determine that the conflict is: (a.) immaterial or not adverse to the interests of the Ethics Council or (b.) the benefits of allowing the person with the conflict to participate in the discussion or consideration, but not the final decision, outweigh the dangers; in which case, the person may participate in the discussion, study, or consideration of the issue, matter, or transaction, but not the final discussion or decision.

It is the duty of each council member to disclose any conflict of interest he or she is aware of to the Ethics Council Chairperson and the IAM President.

A council member who is uncertain as to whether he or she may have a conflict should ask the IAM President who in turn may consult with the IAM General Counsel for an opinion. The President shall issue either a verbal and/or written opinion which shall be presumed to be correct and may be relied upon unless challenged by another council member, in which case the final decision as to whether a conflict exists shall be made by the Ethics Council. The President shall advise the Chair of the Council of each and every opinion issued. Opinions shall, to the extent possible, avoid the disclosure of personal information while, at the same time, disclosing the basis for the opinion. Copies of all opinions shall be retained by the President and be made available to the Ethics Council upon request to permit and encourage consistency.

The minutes of the meeting at which the disclosure of any conflict is made shall reflect that the disclosure was made and whether the person with the conflict withdrew, after making full disclosure of the matter in question and the conflict, and was not present for the final discussion of the matter and any vote thereon.

A conflict of interest exists when:

- [1] Any council member or close relative of a council member or the employer of either of the foregoing has an interest in an issue, matter, or transaction in which IAM has an interest; or
- [2] When any council member or a close relative of a council member acts as an agent, representative, or spokesperson for any person, business, group, or organization, in order to influence the IAM Members' Ethics Council on any issue, matter, or transaction. An individual or organization has an interest for purposes of this policy if he, she, or it:
 - a. is an agent for a person or organization with an identified goal of influencing a decision by the IAM Members' Ethics Council; or

- b. would experience a material economic gain or loss from a decision by the IAM Members' Ethics Council on an issue, matter, or transaction identifiably different from the economic gain or loss that would be experienced by
 - i. a member of the general public,
 - ii. the holder of less than five percent (5%) of the equity in any business entity, or
 - iii. a nonexempt employee of IAM.

Someone is a close relative if they are a spouse, a child, natural or adoptive parent, grandparent, grandchild, brother or sister whether natural, adoptive, or by marriage of a council member. The term also includes any other family member who resides in the same household as a council member or shares living quarters with a council member under circumstances that closely resemble a marital relationship.

In addition to the foregoing, council members should not:

- [1] Use inside information--i.e., information made available to them because of their position as a council member which is proprietary or confidential or otherwise not generally known to the IAM Membership and/or public--for their personal advantage or that of any close relative.
- [2] Accept any service, discount, concession, fee for advice or service, or thing of value from any person or organization with an interest in an issue, matter, or transaction in which council members also have an economic or programmatic interest under circumstances that would suggest an obligation of the part of the council member to exert any influence on IAM Members' Ethics Council and/or the IAM Professional Staff to enter into a transaction or adopt, alter, or abolish any policy or position.

New council members will be given a copy of this policy and specifically asked to read it. Each council member will be asked to complete a Conflict-of-Interest Policy Disclosure Statement upon his or her appointment to the Members Ethics' Council.