

Eye Foundation of America (EFA)

## Confidentiality and Conflict of Interest Policy and Disclosure Form

### Confidentiality

As a member of the Board of Directors, I recognize that I owe a fiduciary duty of care to the Eye Found-  
-ation of America. This includes a duty of confidentiality. All information and documentation  
that I receive from the EFA and others in connection with my service on the Board will be treated with  
strict confidentiality. Neither the contents nor the existence of this information or documentation will  
be shared with anyone other than the officers, directors, employees and authorized agents of the EFA. I  
will direct any questions regarding my confidentiality obligations to the EFA Board President.

### Conflicts of Interest

As a member of the Board, I recognize that I owe a fiduciary duty of loyalty to the Eye Foundation  
of America. This duty requires me to avoid conflicts of interest and to act at all times in the best  
interest of the EFA. The purpose of the conflicts of interest policy (set forth below) is to help inform the  
Board about what constitutes a conflict of interest, assist the Board in identifying and disclosing actual  
and potential conflicts and help ensure the avoidance of conflicts of interest where necessary. This  
policy may be enforced against individual Board members as described below:

1. Board members have a fiduciary duty to conduct themselves without conflicts of interest to the EFA.  
In their capacity as Board members, they must subordinate personal, individual, business, third-party,  
and other interests to the welfare and best interests of the
2. A conflict of interest is conduct, a transaction or relationship that presents or might conflict with a  
Board member's obligation owed to the EFA and the Board member's personal, business or other  
interests.
3. All conflicts of interest are not necessarily prohibited or harmful to the EFA. However, full disclosure  
of all actual and potential conflicts, and a determination by the disinterested Board or Executive  
Committee members – with the Interested Board member(s) recused from participating in debates and  
voting on the matter – are required.
4. All actual and potential conflicts of interest shall be disclosed by Board members to the EFA Executive  
Committee through the annual disclosure form and/or to the Board whenever a conflict arises.  
Disinterested members of the EFA Executive Committee shall make a determination as to whether a  
prohibited conflict exists and what subsequent action is appropriate (if any). The EFA Executive  
Committee shall inform the Board of such determination and action. The Board shall retain the right to

modify or reverse such determination and action, and shall retain the ultimate enforcement authority with respect to the interpretation and application of this policy.

5. On an annual basis, all Board members shall be provided with a copy of this policy and required to complete and sign the acknowledgement and disclosure form below. All completed forms shall be provided to and reviewed by the EFA Executive committee, as well as all other conflict information, if any, provided by Board members.

**Conflicts of Interest Acknowledgement and Disclosure Form**

I have read the conflicts of interest policy set form above and agree to comply fully with its terms and conditions at all times during my service as a EFA Board member. If at any time following the submission of this form I become aware of any actual or potential conflicts of interest, or if the information provided below becomes inaccurate or incomplete, I will promptly notify the EFA Board of Directors in writing.

Disclosure of Actual or Potential Conflicts of Interest:

I am also on the board of Goutami Eye  
Institute, Rajahmundry, India.  
It is one of the entities EFA donates to.

I acknowledge and agree that my selection for service on the Board and the opportunities made available to me by serving on the Board constitute good and valuable consideration for entering into this agreement, the receipt and sufficiency of which I hereby acknowledge.

In my individual capacity:

Signature: V K Raju

Name: V K. Raju, President

Date: 12/30/2023