



Conflict of Interest Policy

Stelleo Scientific Foundation is committed to the highest standards of integrity, transparency, and ethical conduct. This Conflict of Interest Policy is intended to protect the Foundation's interests when it is contemplating entering into a transaction or arrangement that might benefit the private interest of an officer, director, advisory board member, employee, or volunteer.

1. Definitions

A conflict of interest exists when a person in a position of authority over the Foundation has a financial, personal, or professional interest that could compromise—or appear to compromise—their objectivity or independence of judgment in fulfilling their responsibilities to the Foundation.

2. Persons Covered

This policy applies to all members of the Board of Directors, Advisory Board members, officers, key employees, and any individual with decision-making authority on behalf of the Foundation.

3. Duty to Disclose

Individuals covered by this policy must disclose any actual or potential conflict of interest as soon as it arises. Disclosure must be made in writing using the Foundation's Conflict of Interest Disclosure Form.

4. Determining Whether a Conflict Exists

After disclosure of a potential conflict, the remaining disinterested members of the governing or advisory body shall determine whether a conflict of interest exists. The individual with the potential conflict shall not participate in the discussion or decision.

5. Procedures for Addressing Conflicts

If a conflict of interest is determined to exist, the Foundation shall take appropriate steps to ensure decisions are made in its best interest. This may include recusal from deliberation, reassignment of responsibilities, or declining to enter into the proposed transaction or arrangement.

6. Records of Proceedings

The minutes of meetings shall document the disclosure of conflicts, the determination made, and the actions taken to address the conflict.

7. Annual Statements

Each person covered by this policy shall annually sign a statement affirming that they have read, understand, and agree to comply with this Conflict of Interest Policy.

8. Violations of the Policy

If the Foundation has reasonable cause to believe that an individual has failed to disclose a conflict of interest, it shall inform the individual and provide an opportunity for explanation. Corrective action may be taken if a violation is confirmed.

Adopted by the Board of Directors of Stello Scientific Foundation on 12/17/2025.



Stelleo Scientific Foundation's Conflict of Interest Disclosure Form

This form is to be completed annually by all members of the Board of Directors and key personnel of Stelleo Scientific Foundation. It is intended to ensure transparency and maintain the integrity of the Foundation's decision-making processes.

Section 1: Personal Information

Name: _____

Position/Title: _____

Date: _____

Section 2: Disclosure Questions

1. Do you or any member of your immediate family have a financial interest in any entity that has or seeks to do business with Stelleo Scientific Foundation?

Yes No

If yes, please explain: _____

2. Do you or any member of your immediate family hold any position or serve on any board that may influence your decisions at Stelleo Scientific Foundation?

Yes No

If yes, please explain: _____

3. Have you received any gifts, favors, or services from any organization or person doing business with Stelleo Scientific Foundation?

Yes No

If yes, please describe: _____

Section 3: Certification

I certify that the above information is true and complete to the best of my knowledge. I agree to disclose any conflicts of interest that may arise during my service to Stelleo Scientific Foundation, and I will comply with the Foundation's Conflict of Interest Policy.

Signature: _____

Date: _____