

East European University

Conflict of Interest Management Policy

Article 1. Purpose and Scope of the Policy

1. The purpose of this Policy is to prevent, identify, and effectively manage conflicts of interest at East European University in order to ensure impartiality, transparency, and institutional integrity in decision-making processes.
2. The Policy establishes the main principles and mechanisms for the identification, disclosure, and management of conflicts of interest within the University.
3. This Policy applies to:
 - a) academic staff of the University;
 - b) administrative staff;
 - c) governing bodies of the University;
 - d) members of committees and working groups;
 - e) other individuals who participate in the activities of the University or in institutional decision-making processes.
4. This Policy does not restrict the professional or academic activities of University staff; however, it ensures the transparent and ethical management of potential conflicts of interest.

Article 2. Definition of Conflict of Interest

1. A conflict of interest is a situation in which an individual's personal, professional, financial, or other interests may actually, potentially, or apparently influence the impartial and objective performance of their professional duties or the independence of decision-making.
2. A conflict of interest may be classified as:
 - a) **Actual conflict of interest** – when a conflict of interest exists in fact and the individual's personal interests directly influence or may influence their decisions or the performance of their professional duties;
 - b) **Potential conflict of interest** – when a conflict of interest does not currently exist but circumstances create the possibility that it may arise in the future;
 - c) **Perceived conflict of interest** – when a reasonable external observer may form the impression or suspicion that an individual's decisions or actions could be influenced by personal interests.

Article 3. Possible Forms of Conflict of Interest

A conflict of interest may include, but is not limited to:

- a) family or personal relationships;
- b) financial interests or economic benefits;
- c) gifts or other material benefits;
- d) professional or institutional affiliations with other organizations;
- e) external or parallel activities that may influence decisions made within the University.

Article 4. Declaration of Conflict of Interest

1. University staff members are obliged to promptly declare any actual, potential, or perceived conflict of interest known to them.
2. Conflicts of interest shall be disclosed through a written declaration form in accordance with **Annex №1 of this Policy**.
3. Declaration is required:
 - a) for committee members — upon the commencement of their mandate and annually thereafter;
 - b) for individuals involved in decision-making processes — prior to the discussion of the relevant matter;
 - c) immediately upon the emergence of a conflict of interest.

Article 5. Conflict of Interest Management Mechanisms

In cases where a conflict of interest is identified, the following measures may be applied:

- a) recusal from participation in the discussion of the relevant matter;
- b) temporary removal from the decision-making process;
- c) transfer of the matter to another impartial person or body;
- d) implementation of additional monitoring or control mechanisms.

Article 6. Role of the Ethics Committee

1. Issues related to the management of conflicts of interest shall be reviewed by the University's Ethics Committee.
2. The Ethics Committee is authorized to:
 - a) assess the existence of a conflict of interest;
 - b) provide recommendations regarding the management of the conflict of interest;
 - c) where necessary, refer the matter to the appropriate governing bodies of the University.

Article 7. Confidentiality

1. Information related to conflict of interest declarations shall be treated as confidential.
2. Such information shall be used solely for the purposes of ensuring institutional ethics and integrity.

Article 8. Responsibility

1. Failure to declare a conflict of interest or the improper management of such a conflict may constitute an ethical violation.
2. In such cases, appropriate disciplinary measures may be applied in accordance with the University's internal regulations.

Article 9. Monitoring

1. The University periodically evaluates the effectiveness of its conflict of interest management system.

2. The information obtained through this process is used to improve institutional ethics and integrity governance.

Article 10. Final Provisions

1. This Policy is approved by the Representative Council of East European University.
2. The Policy enters into force upon its approval.
3. The Policy is publicly available on the official website of the University.

Declaration of Conflict of Interest

I. General Information

Full name: _____

Position / Status

- Member of the Ethics Committee
 Academic staff
 Administrative staff
 Other (please specify): _____

Structural unit / faculty: _____

Date of declaration: _____

Email: _____

II. Definition of Conflict of Interest

A conflict of interest exists when an individual's personal, professional, financial, or other interests may actually, potentially, or apparently influence the impartial and objective performance of their professional duties or the independence of decision-making.

III. Declaration

Do you have an **actual, potential, or perceived conflict of interest** related to your activities at the University?

- No
 Yes (please describe below)

Description of the conflict of interest:

IV. Declaration and Commitment

- I confirm that the information provided above is complete and accurate.
 In the event of a conflict of interest, I will refrain from participating in the discussion or decision-making related to the relevant matter.
 I undertake to update this declaration immediately if a conflict of interest arises or changes.

I understand that providing false or incomplete information may lead to appropriate institutional measures.

V. Signature

Signature: _____

Date: _____

VI. Ethics Committee Assessment

(To be completed by the Ethics Committee)

Date of review: _____

Assessment

- No conflict of interest identified
- Potential conflict of interest
- Actual conflict of interest
- Perceived conflict of interest

Decision

- Recusal from participation
- Transfer of the matter to another person
- Additional monitoring required
- Other: _____

Chair of the Ethics Committee: _____

Signature: _____

Date: _____