



Managing Conflict of Interest Policy

Objective

The purpose of this policy is to set out the general principles on how to avoid and manage conflict of interests in all Coalition for Epidemic Preparedness Innovations (CEPI) activities involving external parties.

This policy applies to all members of the CEPI Board, all CEPI employees, whether on a permanent or fixed-term contract, and also to other individuals engaged on a temporary basis, all members of the CEPI Scientific Advisory Committee, consultative bodies (e.g. Joint Coordination Group, Working Groups, etc.), independent experts and consultants.

CEPI will require that its awardees conduct their CEPI-funded programme according to similar principles and will abide by applicable laws and standards in the relevant territories and jurisdictions where the CEPI-funded activities are undertaken.

Definitions

Associate: A CEPI associate is anyone chosen or appointed to act or speak on behalf of CEPI. This includes: paid consultants (whether full- or part-time); external reviewers or other experts engaged by CEPI (whether paid or unpaid); and members of CEPI's Board of Directors and advisory bodies (e.g., Scientific Advisory Committee, Joint Coordination Group).

Financial interest: A financial interest arises when an individual, or institution represented by an individual, entrusted with official duties or position by CEPI may benefit financially or in any other significant way from a transaction or other financial arrangement between CEPI and an entity with which the person has:

- an ownership or investment interest;
- a senior leadership or Board member position (whether paid or unpaid);
- a direct or indirect compensation arrangement, including through employment, a business, investment or family member, or in the form of substantial gifts or favors,
- or a potential of securing any of the above.

Non-financial interest: Non-financial interest refers to any non-financial benefit or advantage, including, but not limited to, enhancement of an individual's career, education or professional reputation; access to privileged information or facilities. A non-financial interest may also refer to an individual having competing duties of loyalty to CEPI and the entity by which he/she is employed and/or is an officer, trustee, board member.

Conflict of interest: Conflict of interest is the conflict between the financial or non-financial interests of an individual or an institution represented by an individual, and the official duties or position entrusted to the individual by CEPI, which may compromise or have the appearance of compromising the individual's impartiality, integrity and professional judgement in acting in the best interest of CEPI, and lead to unfair competitive advantage or disadvantage for such individual or institution represented by an individual during CEPI's decision-making processes.

Individual conflict of interest vs. institutional conflict of interest: Individual conflict of interest exists when financial or non-financial interests of an individual may conflict with official duties or position entrusted to that individual by CEPI. Institutional conflict of interest exists when an individual entrusted with official duties or position in CEPI is an officer, director, trustee, partner or an employee of an institution that may benefit financially or non-financially from a CEPI decision he or she would vote on.

Associated person: An “associated Person” in relation to a CEPI associate refers to immediate family members and emotional ties (spouse, partner, parents, children, siblings, mother-, father-, brothers- and sisters-in-law)

Policy statement

CEPI will manage all types of conflicts of interest following a due procedure that describes how to disclose and evaluate potential conflict of interests and how to manage these.

CEPI is committed to the following principles:

- All individuals working on CEPI activities shall, at all times, act in the best interests of CEPI and take appropriate steps to avoid situations and positions that may create or appear to create conflicts of interest between their own and CEPI interests.
- All decision-making and actions related to selecting external partners will be impartial and unbiased, meaning CEPI will be open, fair, and non-discriminatory in engaging with all external partners. Everyone involved in the selection of external partners is accountable for his or her own actions and decisions. All CEPI employees should be particularly aware of potential conflicts of interest when serving as board members or having personal ownerships in companies providing services to CEPI.
- CEPI requires that anyone nominated to participate in a specific call for proposals, implementing partner selection or procurement process declare any potential conflicts of interest and maintain a high level of confidentiality throughout the process. Anyone who does not sign the Disclosure of Interest form will not be permitted to participate in the selection process (Ref CEPI Procurement-and Implementing Partner Selection Policy and Procedures).
- Concerns about conflicts of interest shall be taken up with the CEPI General Counsel.
- The CEPI General Counsel shall update the CEPI CEO, the CEPI Deputy CEO and the CEPI Board Members on conflicts of interest disclosures at least once per year for transparency.

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Owner	General Counsel
Linked documents	Procurement Policy and Procedure