



UNIVERSITY OF
Global Health
EQUITY

UGHE Code of Ethics & Conflict of Interest



I, acknowledge that:

I have received, carefully read, and understand UGHE's HR Manual & Code of Conduct

I have complied and will continue to comply with the terms of the Code of Conduct and all other policies and procedures that apply to my job.

I am responsible for avoiding any activity, relationship, position, or investment that interferes or reasonably could interfere with my ability to make honest, objective decisions for UGHE. I have a duty to notify my manager (or the HR Department) if I am involved (or may become involved) in any situation(s) that creates or might create an actual or potential conflict of interest.

I am responsible for notifying the Company if I become aware of any potential legal or ethical violations involving UGHE or its affiliates. I have the option to report any such concerns or violations openly or anonymously using any of the options stated in the HR Manual or Code of Conduct

I agree to cooperate fully with UGHE to the extent necessary or helpful to implement the HR Manual or Code of Conduct. I understand UGHE's policy against retaliation and will not take any adverse action against an associate who, honestly and in good faith, voices ethical or legal concerns involving UGHE or its associates.

I also confirm that I have not done any act or thing which in the reasonable opinion of UGHE bring either myself, UGHE and its associates, or any shareholder, director, officer or employee or other stakeholder of the same into serious disrepute.

I will be subject to disciplinary action, up to and including dismissal, if UGHE determines that I have violated the HR Manual or Code of conduct in any way whatsoever.

EMPLOYEE'S NAME _____

EMPLOYEE'S SIGNATURE _____

DATE _____

CONFLICT OF INTEREST DISCLOSURE FORM (“COI FORM”)

For the purpose of this COI, references to ‘UGHE’ herein shall include UGHE and its associates (including the projects, conferences, programs and/or partly owned by UGHE has either an equity or other contractual relationship including via a Distribution Agreement, Convertible Note, Warrant or any other material business interest).

- a. A ‘conflict of interest’ is considered to be any connection or association with a third party that is (or appears to be) against the best interests of UGHE, or which could enable you reasonably to be suspected of using your position within the Company, to gain an unfair advantage for or from a third party.
- b. Conflicts of interest are best avoided altogether; however, UGHE acknowledges that conflicts of interest (and potential conflicts) are sometimes unavoidable. In such circumstances the principles of openness and integrity apply and you are required to disclose and manage the conflicts accordingly as soon as they occur or you are aware that one will occur.
- c. c) In connection with your role at UGHE, you might become a Board Director of a subsidiary company or external organization. You must register such positions as a declaration of interest because you have a duty to that organization independent of your role as an employee of UGHE. If, however you serve on a group or body purely as a UGHE representative and not as a Director, this would not normally constitute an interest of Interest.
- d. d) A ‘personal’ conflict of interest may involve individuals known to you or your immediate family; or by affiliation or a ‘pecuniary interest’, such as benefiting from a programme or a project’s awarded contract, investment or grant. If there is any doubt, it is better to declare any conflict of interest (or a potential conflict) rather than ignore it or conceal it.
- e. e) You should complete a Declaration of Interests form each time there is an actual conflict of interest or a likely chance of potential conflict. There may be circumstances where voluntarily declaring a personal situation may avoid the risk of future challenges or misunderstandings.
- f. f) Your Line Manager, Head of Department, Dean or VC respectively (whoever is responsible) is also required to confirm how the conflict will be managed and sign and date the declaration. The original signed and countersigned declaration should then be sent to the HR Department to be placed on the employee file.

UGHE POLICY STATEMENT

A “conflict of interest” refers to any current professional, financial or other interest which could:

- i) significantly impair the individual’s objectivity in carrying out his or her duties and responsibilities for UGHE, or*
- ii) create an unfair advantage for any person or organization.*

For the purposes of this policy, circumstances that could lead a reasonable person to question an individual’s objectivity, or whether an unfair advantage has been created, constitute a potential conflict of interest. These potential conflicts are subject to disclosure.



Employees must not use their official position, or information acquired in the course of their work, to gain any benefit or to further their private interests or those of others.

All employees should ensure that any possible conflict of interest is identified at an early stage and appropriate action is taken to resolve it. If an employee has to deal with any matter in the course of their official duties in which they have a private interest, however slight, they must disclose all the facts to their Director, line manager or HR Department

Non-disclosure of an actual or potential conflict of interest may result in disciplinary action (up to and including dismissal).

COI- FULL DISCLOSURE FORM

1. APPOINTMENTS AND ACTIVITY

Do you hold any position or appointment, or any business or professional relationships (whether commercial or non-financial) with other bodies related to Global Health or Equity?

Yes No

Details:

2. EMPLOYMENT AND CONSULTING

Do you receive any remuneration from a commercial entity or other organization with an interest related to the subject of UGHE work in which you are engaged? Employment or consulting, including services as a technical or other adviser.

Yes No

Details:

Do you have any other colleague or student, that you are related to in any way that might represent or give rise to a conflict of interest, or the 3rd party perception of a conflict of interest with regard to your UGHE service?

Yes No

Details:

3. RESEARCH SUPPORT

Do you receive financial support from any commercial entity or other organization with an interest related to the subject of the UGHE work? Research support, including grants, collaborations, sponsorships, other funding.

Yes No

Details:



Non-financial support valued collectively in excess of US\$5,000 per year (premises, equipment, facilities, assistants, paid travel, etc.)

Yes No

Details:

Support, including honoraria, for being on a speakers' panel, giving speeches or training for a commercial entity or other organization with an interest related to the subject of the UGHE work?

Yes No

Details:

4. INVESTMENT INTERESTS

Do you have investments in any commercial entity with an interest related to the subject of the UGHE work? (Please also include indirect investments such as a trust or holding company Stocks, bonds, stock options, other securities (e.g. short sales)). You may exclude mutual funds, pension funds or similar investments that are broadly diversified and over which you exercise no control.

Yes No

Details:

Commercial business interests (e.g. ownership, partnerships, joint ventures, board memberships, controlling interests).

Yes No

Details:

5. INTELLECTUAL PROPERTY

Do you hold or have any interest in any Intellectual Property? Patents, trademarks or commercial copyrights (including pending applications).

Yes No

Details:

Proprietary knowledge in a technology or processes being used for commercial purposes.

Yes No

Details:

6. NON-FINANCIAL INTERESTS

Are you engaged in any professional or other activities which outside parties could consider might represent or give rise to a conflict of interest, or the perception of a conflict of interest with regard to your UGHE service?

Yes No

Details:

Are you involved in any:	Yes	No	If 'yes' short details please
Official function in a government agency or international organization?			
Advisory committee associated with a public or private sector organization?			
Board member of a public or private sector organization?			
Board member of a non-profit organization?			

7. FINANCIAL INTERESTS

Do you hold any financial interests in excess of US\$5,000 per year which outside parties could consider might represent or give rise to a conflict of interest, or the perception of a conflict of interest with regard to your UGHE service?

Yes No

Details:

8. ADDITIONAL INFORMATION

If not already disclosed above, are you aware of any aspect of your work for or employment with UGHE that will enable you to obtain access to proprietary information or create for you (or others outside UGHE) a competitive advantage in your professional, financial or business

Yes No

Details:



Non-disclosure of an actual or potential conflict of interest may result in disciplinary action.

DECLARATION

I hereby declare that the information in and accompanying this disclosure is true, accurate and complete to the best of my knowledge and belief. I declare that I have disclosed all associations required for disclosure under the UGHE/PIH Conflict of Interest Policy; and that, except as declared, I do not consider that any of the associations present a conflict of interest.

Should there be any change to the above information and declaration, I will promptly notify UGHE HR Department & ELT and complete a new declaration of interest form that describes the changes. This includes any change that occurs before or during my work with UGHE and through the period of my engagement up to finalization or publication of results, or completion of the activity concerned.

I understand that information about my interests will be held by UGHE for a period equivalent to the length of my contract, after which the information will be destroyed. I understand that these forms will be considered confidential and will be reviewed in accordance with the COI Implementation Procedures.

I hereby declare that I will comply with the UGHE COI Policy and the Implementation Procedures.

NAME:

POSITION:

SIGNATURE:

DATE: