

# Conflict of Interest Policy

## Purpose and scope

The Foundation aims to independently, impartially and reliably measure, monitor, review and publish the performance of pharmaceutical companies with respect to their efforts to improve access to medicine globally, bring antimicrobial resistance under control and ensure all children are immunised wherever they live.

The purpose of this Policy is to protect the credibility of the Foundation's decision-making and research processes and enable our stakeholders to have confidence in the organisation's integrity.

Transparency about the development and management of the criteria of the research programmes/initiatives of the Foundation, as well as transparency about the assessment and management of (actual, potential and perceived) conflicts of interest, are crucial to the credibility of the research programmes/initiatives of the Foundation.

## Policy change log

Date	Change	Created/edited by	Approved by
1/10/2024	Policy revision and update	Marijn Verhoef	Jay Iyer

<b>Responsible</b>	Director of Operations
<b>Next revision date</b>	1/10/2025

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## Definitions

- Actual, potential (could develop) or perceived (could be considered likely) conflicts of interest can arise across all areas of our work. Conflicts may be of a personal, financial or political nature.
- A material conflict of interest is an interest which, in view of all the circumstances, could reasonably be expected to affect the independence, impartiality and reliability of the person with the interest.
- Material conflicts of interests of individuals related to the research programmes/initiatives of the Foundation could lead to:
  - biases in measurements, monitoring or reviews;
  - biases in the publication of measurements, monitoring or reviews;
  - misuse of privileged and confidential knowledge.

## Policy

Any person exercising influence on methodologies, measurements and publications of the Access to Medicine Foundation (“the Foundation”), including Supervisory Board members, staff, freelancers, volunteers, trainees and external contractors, shall have no material conflict between their personal, professional or business interests and the integrity of the research programmes/initiatives of the Foundation, in any and all actions taken by them on behalf of or for the Foundation in their respective capacities.

The Foundation does not directly nor indirectly recommend the purchase or sale of equity securities, nor does it hold such assets.

## Non-exhaustive list of actual, potential and perceived conflicts of interest

- Having a direct financial interest in a company that is measured by the research programmes/initiatives of the Foundation;
- Having direct possession, purchase or sale of equity securities in a company that is measured by the research programmes/initiatives of the Foundation;
- Providing privileged or confidential information or advice to third parties which can be used to decide on such purchase or sale;
- Receiving financial compensation, gifts, hospitality or other favours from a company that is measured by the research programmes/initiatives of the Foundation or from a company that has itself a conflict of interest; financial compensation includes direct and indirect remuneration as well as gifts, hospitality or favours worth 50 euros or more;
- Having a close family member (e.g. spouse, parent, child or spouse of a child, brother, sister, or spouse of a brother or sister) with such interests;
- Other interests that have been deemed potentially conflicting by the Supervisory Board.

## Reporting and management of actual, potential and perceived conflicts of interest

Upon appointment, any person exercising influence on methodologies, measurements and publications of the Foundation, including Supervisory Board members, staff, freelancers, volunteers, trainees and external contractors, shall disclose actual, potential and perceived conflicts of interests to their line manager, contact person at the Foundation or the Finance Team ([finance@accesstomedicinefoundation.org](mailto:finance@accesstomedicinefoundation.org)) through the Conflict of Interest Declaration Form (Annex 1).

New conflicts of interest shall be reported through the same Conflict of Interest Declaration Form (Annex 1) within 5 working days after they arise.

As soon as a declaration has been made, line management, contact persons at the Foundation or the Finance Team must ensure that they review all declarations within five working days and report them to the Management Team, with a recommendation of mitigating actions (if needed).

The Management Team shall evaluate all declarations of conflicts of interest within five working days and decide whether they are 'material' conflicts of interest and what mitigating actions are required (if needed).

### **Context for gifts and hospitality**

It is widely recognised that it is important for employees, board members and contracted employees to maintain and build effective networks in order to support the work of the Foundation, and to gain a real understanding of the views of stakeholders. However, contact with organisations outside government can give rise to offers of gifts and hospitality.

While accepting gifts and hospitality in certain circumstances may further the Foundation's interests, this must be balanced with upholding high standards of propriety and guarding against any reasonable suspicion of perceived or actual conflicts of interest or an undue obligation being created.

### **Acceptance of gift and hospitality**

When working on behalf of the Foundation, any person exercising influence on methodologies, measurements and publications of the Foundation, including Supervisory Board members, staff, freelancers, volunteers, trainees and external contractors, should not normally accept gifts and hospitality. The only exceptions are those which would normally be considered as isolated trivial gifts e.g. low value items that can be used or displayed in the workplace such as office stationery or mouse mats or inexpensive seasonal gifts such as diaries and calendars, event goodie bags, tokens of appreciation for speaking engagement (e.g. books, stationery etc.), or food/beverages provided to those in attendance at meetings and events.

Any hospitality accepted should be in the interests of the Foundation and help further its objectives. It should not be over-frequent or over-generous. Accepting hospitality from the same organisation could lead to a perception that the work of the Foundation is being influenced by the objectives of a single organisation. Any hospitality accepted should not seem lavish or disproportionate to the nature of the relationship the person has with the provider.

The Foundation recognises that in some cases non-acceptance may cause embarrassment to the provider. Gifts which cannot be refused without causing offence (for example, a picture or an ornament) must be accepted "on behalf of the Foundation", making it clear that it is not being accepted as a personal gift. Such gifts must be kept within the Foundation and displayed in a general area.

When working on behalf of the Foundation, any person exercising influence on methodologies, measurements and publications of the Foundation, including Supervisory Board members, staff, freelancers, volunteers, trainees and external contractors, must declare and report all gifts and hospitality (accepted or declined) that are valued over 50 euros to their line manager, contact person at the Foundation or the Finance Team within 5 working days after the gift and hospitality was offered. Reporting should include the person and/or organisation providing the gift, a description of the gift, its estimated value and the date in which the gift was received.

If there is any doubt about whether or not hospitality or gifts should be accepted, the person should seek advice and guidance from their line manager, contact person at the Foundation or Finance Team.

### **Confidentiality**

Research outcomes are confidential until their formal time of release. Any individual within the Foundation or working for the Foundation who has advance knowledge of research programmes/initiatives outcomes shall not disclose any part of such outcomes to third parties before the formal time of release.

### **Corrective actions**

- Any material conflict of interest or any violation of the rules set forth in this Policy shall prompt disciplinary and/or corrective action by the Management Team and/or Supervisory Board.
- A charge of incompletely or inaccurately disclosed conflicts of interest shall be directed to the Management Team or, in case of Supervisory Board members, to the Chair of the Supervisory Board.
- The Management Team or, in case of Supervisory Board members, the Chair of the Supervisory Board shall take no action until it has given the person charged with the alleged conflict of interest the opportunity to fully represent him/herself.
- The Management Team or, in case of Supervisory Board members, the Chair of the Supervisory Board may appoint a disinterested person or committee to investigate the alleged conflict of interest.
- The person with the alleged conflict of interest shall not take part in any vote on the nature of the interest or any related decision.

## Annex 1 – Conflict of Interest Declaration form

*To be completed and signed by any person exercising influence on methodologies, measurements and publications of the Access to Medicine Foundation (“the Foundation”), including Supervisory Board members, staff, freelancers, volunteers, trainees and external contractors.*

[ ] I have reviewed and understood the Conflict of Interest Policy of the Access to Medicine Foundation and agree to abide by it.

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[ ] I have no actual, potential or perceived conflict of interest as defined in the Conflict of Interest Policy of the Access to Medicine Foundation.

OR

[ ] I report the following conflicting interest(s), as defined in the Conflict of Interest Policy of the Access to Medicine Foundation.

*Please describe fully, including name and nature of the interest.*

1. \_\_\_\_\_  
\_\_\_\_\_

2. \_\_\_\_\_  
\_\_\_\_\_

3. \_\_\_\_\_  
\_\_\_\_\_

I hereby certify that the information provided is true and complete to the best of my knowledge, that I will adhere to the decisions on conflicts of interest adopted by the Access to Medicine Foundation; and that I will report future changes to this information to my line manager, my contact person at the Foundation or the Finance Team ([finance@accesstomedicinefoundation.org](mailto:finance@accesstomedicinefoundation.org)) within 5 working days after they arise.

Name: \_\_\_\_\_

Position: \_\_\_\_\_

Signature: \_\_\_\_\_

City, Date: \_\_\_\_\_