

Policy Owner:	Vice President Finance and Administration		
Responsible Unit:	Human Resource Directorate		
Policy Name:	Conflict of Interest		
Policy ID Code:	GO-CC.01.002	Rev. 00	Page 1 of 7

## CONFLICT OF INTEREST POLICY

Ver.	Approval Date	Effective Date	Type of Change	Approved by
00	02/12/2025	02/12/2025	Initial Release	Board of Trustees

Policy Owner:	Vice President Finance and Administration		
Responsible Unit:	Human Resource Directorate		
Policy Name:	Conflict of Interest		
Policy ID Code:	GO-CC.01.002	Rev. 00	Page 2 of 7

## 1. Purpose

This policy establishes Hamad Bin Khalifa University's (HBKU) standards for identifying, declaring, reviewing, and managing Conflicts of Interest. It ensures that University activities are conducted in an honest and transparent manner, and all decisions are taken with objectivity, integrity, fairness, impartiality, transparency, and in the best interest of the University.

## 2. Scope

This policy applies to all HBKU regular employees, visiting faculty or scholars, consultants, postdocs, seconded and loaned staff, contractors and contracted staff, contributors, freelancers, workers, trainees, volunteers, interns, individuals holding a formal appointment or affiliation with HBKU such as members of committees, boards, or other university advisory or consultative bodies, or any other person working in any context within the university and across HBKU organizational units as well as HBKU affiliated entities.

This policy continues to apply to individuals who are on leave including sabbatical leave, seconded or loaned employees, or employees who are visiting other institutions.

This policy also applies to HBKU students when engaged in research, funded projects, employments, or other official university roles or activities that may create potential conflicts of interest. For all other matters, students are governed by the Student Code of Conduct and other student' related policies.

Other university policies addressing additional Conflict of Interest situations that may arise in specific areas and activities such as conflicts of interest in research are to be enforced concurrently with this policy.

## 3. Terms, Abbreviations, and Definitions,

The following terms and abbreviations used in this policy shall have the meanings defined below:

Term/Abbreviation	Definition
Conflict of Commitment	A situation in which an HBKU employee or contracted staff undertakes a role (paid or unpaid) that interferes, appears to, or has the potential to interfere with the employee or contracted staff's ability to perform his/her job duties and responsibilities as defined in their job description or contractual agreement and to meet their obligations to the University.
Conflicts of Interest (Col)	The term Conflict of Interest encompasses both Conflicts of Interests and Conflicts of Commitment. A Conflict of interest arises in situations in which an individual's professional, financial or personal relationships or activities influence or could reasonably be perceived to influence their professional judgment, objectivity, or decision-making. Such conflicts may create situations in which personal interests compete or appear to compete with the university's best interests.
Col Management Plan	A written agreement that sets out the conditions and prescribes the necessary actions to manage a Col.
Col Review Committee	A standing body established by the VPFA to review and assess Conflict of Interest declarations referred to it. The Committee provides an impartial evaluation and issues recommendations
Consultancy	A professional activity in which an individual provides expertise, advice, or services to an external individual, organization, or entity, normally under a fee-for-service or equivalent arrangement, and outside the scope of their primary roles and responsibilities at Hamad Bin Khalifa University.
Disclosing member	The individual who submits a declaration of actual, Potential or Perceived Col.
Employee	Any person engaged to perform work for HBKU under HBKU's direction and supervision.

Policy Owner:	Vice President Finance and Administration		
Responsible Unit:	Human Resource Directorate		
Policy Name:	Conflict of Interest		
Policy ID Code:	GO-CC.01.002	Rev. 00	Page 3 of 7

HBKU or “the University”	Hamad Bin Khalifa University
HBKU Community	HBKU employees, visiting faculty or scholars, consultants, students, postdocs, seconded staff, contractors and contracted staff, contributors, freelancers, workers, trainees, volunteers, interns, individuals holding a formal appointment or affiliation with HBKU such as members of committees or other university advisory or consultative bodies, or any other individual acting on behalf of HBKU or working in any context within the university and across HBKU organizational units as well as HBKU affiliated entities.
Misconduct	Conduct, behavior, action, or performance whether on duty or off duty and whether on or off University premises, that interferes with or adversely affects the efficient operation of the University, damages the reputation or interests of the University, or violates applicable laws, regulations, University policies, procedures, code of conduct, or other University codes.
Personal Relationship	Any familial, household, or close personal connection that may reasonably create, or appear to create, a conflict of interest, bias, or undue influence in professional or employment-related decisions. Such relationships include, but are not limited to spouse, parent, son or daughter, brother or sister, grandparent or grandchild, aunt or uncle, niece or nephew, cousin, guardian or sponsor, step, half, or in-law relation, a person living in the same household, or any other person with such a close bond or relationship as to suggest a conflict in the professional or employment relationship.
President	HBKU President
Potential Col	A potential Col exists where the interests of an individual are not currently in conflict with the university best interests, but there is a reasonable likelihood that they may create a conflict in the future.
Perceived Col	A situation in which personal or external interests may appear to influence an individual's objectivity or independence of judgment, even if no actual conflict exists. The perception of a conflict may arise when circumstances create doubt about the individual's ability to act solely in the best interest of the University.
Summary Dismissal	The immediate termination of employment or contractual agreement with a member of HBKU Community when immediate dismissal without a Notice Period is necessary.
Suspension	An interruption of active employment or contractual agreement with or without pay required of a member of HBKU Community resulting from performance issues or Misconduct. Suspension without pay is a Disciplinary Action while Suspension with pay is not a Disciplinary Action.
Col-DO	The HBKU Officer designated by the VPARC in consultation with the VPFA who is responsible for overseeing the management of Cols at HBKU.
VPARC	Vice President Audit, Risk and Compliance
VPFA	The HBKU Vice President Finance and Administration

## 4. Policy

### 4.1. General Principles

4.1.1. HBKU maintains a zero-tolerance approach toward undisclosed or unmanaged Conflicts of Interest, reinforcing its commitment to integrity, transparency, and accountability.

<b>Policy Owner:</b>	<b>Vice President Finance and Administration</b>		
<b>Responsible Unit:</b>	<b>Human Resource Directorate</b>		
<b>Policy Name:</b>	<b>Conflict of Interest</b>		
<b>Policy ID Code:</b>	GO-CC.01.002	Rev. 00	Page 4 of 7

- 4.1.2. HBKU Community members shall not knowingly become involved in a Conflict of Interest, or upon discovery thereof, allow such a conflict to continue.
- 4.1.3. All members of HBKU Community must perform their roles and responsibilities objectively, without favoritism or preference arising from direct or indirect personal interest, financial or otherwise.
- 4.1.4. All members of HBKU Community must not engage in any activity or relationship that gives rise to a Col or creates the appearance of bias, favoritism, or undue influence.
- 4.1.5. Members of HBKU Community must always act and make decisions in the best interests of HBKU and comply with the University policies, procedures, code of conduct, and other applicable university codes as well as applicable laws and regulations of the State of Qatar.
- 4.1.6. All members of HBKU Community must declare actual, Potential, or Perceived Cols in accordance with this policy and related procedures.
- 4.1.7. Each member of HBKU Community is responsible for recognizing situations in which they may have a Col or where their activities or relationships might reasonably be perceived by others as creating a Conflict of Interest.
- 4.1.8. In addition to complying with this policy, members of HBKU Community must also comply with any other applicable Col requirements that may be applicable to their activity or project. For example, individuals engaged in sponsored research must comply with the Col requirements set by external funders or contractual partners as well as other relevant HBKU policies.
- 4.1.9. Conflicts of Interest may arise in many forms and circumstances. While it is not possible to provide an exhaustive list, the following list identifies common situations that all members of the HBKU Community must avoid, unless properly declared and formally approved by their direct supervisor, line manager, or higher authority in the reporting line and the Col-DO:
  - Using position, authority, or access to HBKU resources, supplies, or confidential information for personal gain or for the benefit of external entities or individuals with whom they have Personal Relationship.
  - Participating in recruitment, promotion, or evaluation, involving themselves, relatives, or individuals with whom they have Personal Relationship.
  - Participating in procurement, tendering, or contracting processes involving themselves, relatives or individuals with whom they have Personal Relationship.
  - Holding ownership, equity, or control in organizations that conduct or seek to conduct business with HBKU.
  - Holding any academic, research, or administrative affiliation or appointment with another institution, organization, or entity in addition to HBKU, unless such affiliation has been fully disclosed and approved in advance by the Provost, the Vice President for Research, the VPFA, or the President, as appropriate.
  - Teaching, supervising, grading, or assessing students, trainees, or researchers with whom they have a Personal Relationship.
  - Faculty, scientists and researchers employing or seeking to employ or otherwise utilize a student's services in connection with business venture when the faculty member, scientist, or researcher has an academic, advising or supervisory relationship with the student.
  - Engaging in outside activities that may influence one's ability to make decisions in the best interest of HBKU
  - Engaging in outside activities which may create a Conflict of Commitment unless expressly authorized and approved in advance by the appropriate authority.

Policy Owner:	Vice President Finance and Administration		
Responsible Unit:	Human Resource Directorate		
Policy Name:	Conflict of Interest		
Policy ID Code:	GO-CC.01.002	Rev. 00	Page 5 of 7

- Engaging in activities that are in direct competition with the university.
- Engaging in a financial activity with a HBKU competitor, supplier, or customer.
- Using, transferring, or commercializing the university intellectual property for personal benefit, for the benefit of individuals with whom they have Personal Relationship, or for external entities.
- Accepting gifts, hospitality, favors, or services from vendors, contractors, collaborators, or partners that exceed the threshold defined in this policy.

4.1.10. If an individual is uncertain whether a situation may constitute an actual, Potential, or Perceived Col, they should seek guidance in advance by consulting their supervisor, higher authority in their reporting line, or the Col-DO.

#### 4.2. Gifts and Hospitality

- 4.2.1. Members of the HBKU community must not solicit or request gifts, hospitality, favors, or services from any party with actual or potential collaboration with HBKU.
- 4.2.2. It is permitted to accept items of nominal value given by entities to external visitors. Examples of these items are typical institution pamphlets, plaques, and calendars.
- 4.2.3. Members of the HBKU Community must not accept tangible or intangible gifts exceeding QAR 500 per instance or a cumulative total of QAR 1,500 per source or gift provider within a calendar year, from vendors, contractors, collaborators, or other external parties.
- 4.2.4. Members of the HBKU Community must respectfully decline gifts of a value of QAR 500 or more if they believe that the gift may be perceived to influence their professional judgement, objectivity, or primary responsibility to HBKU to avoid any appearance of Conflict of Interest.
- 4.2.5. Any gift, hospitality, favor, or service that cannot be respectfully declined must be declared within five (5) working days of receipt and surrendered to the University for proper disposition.

#### 4.3. Conflict of Interest Declaration

- 4.3.1. The Human Resources Directorate is responsible for administering the annual Col declaration and disclosure process ensuring timely collection, review, and follow-up of submitted declarations in coordination with relevant HBKU organizational units or affiliated entities.
- 4.3.2. All HBKU employees including senior administrators, faculty, scientists, researchers, staff, contracted staff, and freelancers as well as individuals holding a formal appointment or affiliation with HBKU must submit a Col Declaration Form annually. They must update their declarations immediately upon the emergence of new or changed circumstances or situations that may give rise to an actual, Potential, or Perceived Col.
- 4.3.3. Other members of HBKU Community, such as students and visitors, are not generally required to submit an annual declaration of Col. However, they must disclose any actual, Potential, or Perceived Col using the Col Declaration Form whenever such situations arise.
- 4.3.4. Members of HBKU Community must disclose actual, Potential, or Perceived Col to their supervisor, or line manager, or higher authority in their reporting line, or designated Col officers in their functional area (when applicable), and submit a duly completed Col Declaration Form to the office of the VPFA.
- 4.3.5. If in doubt, HBKU Community members are encouraged to declare any actual, Potential, or Perceived Col.

Policy Owner:	Vice President Finance and Administration		
Responsible Unit:	Human Resource Directorate		
Policy Name:	Conflict of Interest		
Policy ID Code:	GO-CC.01.002	Rev. 00	Page 6 of 7

- 4.3.6. The disclosing member must provide all required information as part of the declaration in a complete and timely manner.
- 4.3.7. All HBKU Employees must complete mandatory Col training upon joining the University and thereafter at least once annually, as a condition of continued service and compliance with this policy.

#### 4.4. Handling of Col Declarations

- 4.4.1. The COI-DO will review each Col declaration and, as appropriate, consult with the individual's supervisor, line manager, higher authority in the reporting line, and other concerned parties. Based on this review, the Col-DO may:
  - Approve the activity subject of the declaration,
  - Develop and implement a Col Management Plan,
  - Require the individual to terminate the activity, or
  - Refer the declaration to the Col Review Committee for review and recommendation.
- 4.4.2. Many situations will require no more than a declaration and a brief written record of that declaration, which must be held on record.
- 4.4.3. The Col Review Committee, will review all referred declarations and provide recommendations to the Col-DO, who will decide to either:
  - Approve the activity subject of the declaration,
  - Develop and implement a Conflict of Interest Management Plan, or
  - Require the individual to terminate the activity.
- 4.4.4. Where a Col involves the Col-DO, the case shall be referred to the VPARC designated person for review and decision.
- 4.4.5. Where a Col involves the University President, the case shall be referred to the VPARC for review and decision by the Chair of the Board of Trustee's Audit Committee.

#### 4.5. Conflict of Interest Management Plan

- 4.5.1. A Management Plan is developed when a Col is determined to be manageable. The Management Plan sets out the conditions and safeguards under which the activity may proceed.
- 4.5.2. The Col Management Plan may include any or a combination of the following:
  - Limiting or denying access to documentation and meetings,
  - Recusal from discussions on certain matters,
  - Recusal from some or all aspects of decision-making including voting,
  - Exclusion from any involvement in a particular project or activity,
  - Divesting or placing in trust certain financial interests, and/or
  - Disclosing the interest to a sponsor or other third party.
- 4.5.3. The Col Management Plan must be approved by the Col-DO, reviewed by the general counsel or other relevant legal authority and where appropriate, the immediate supervisor or line manager or a higher authority in the reporting line of the concerned individual.
- 4.5.4. The Col Management Plans must be documented and kept on record, reviewed and updated as necessary with copies provided to the relevant parties.
- 4.5.5. Concerned HBKU Members are required to comply fully with the terms of any approved Col Management Plan.

#### 4.6. Eliminating Conflicts

- 4.6.1. Some Cols are unacceptable and must be eliminated, including but not limited to the following:
  - Undisclosed financial interests in entities doing business with HBKU.

Policy Owner:	Vice President Finance and Administration		
Responsible Unit:	Human Resource Directorate		
Policy Name:	Conflict of Interest		
Policy ID Code:	GO-CC.01.002	Rev. 00	Page 7 of 7

- Supervising, grading, or evaluating relatives or individuals with whom the member has a personal relationship.

4.6.2. Members must withdraw, divest, or recuse themselves from activities where the conflict cannot be adequately managed.

#### 4.7. Violation of this Policy

4.7.1. Failure to comply with this policy or any approved Col Management Plan constitutes a violation of this policy and may result in disciplinary action, up to and including summary dismissal. Violations include, but are not limited to:

- Failure to disclose actual, Potential, or Perceived Col as required under this policy.
- Failure to comply with the conditions set in the Col Management Plan.
- Providing false, misleading, or incomplete information in any declaration, or review process.

4.7.2. Where appropriate, HBKU may also report violations to external sponsors, regulators, or other competent authorities as required by the Laws and regulations of the State of Qatar, or University policies and procedures.

4.7.3. If individuals have doubts or concerns about a potential undisclosed Col or how an existing conflict is being managed, they should contact their direct supervisor, line manager, or higher authority in their reporting line or designated Col officers in their functional area (when applicable), or the Col-DO.

#### 4.8. Confidentiality

4.8.1. All declarations and reviews are strictly confidential. Breaches constitute misconduct and may lead to disciplinary actions including Summary Dismissal.

### 5. Associated Procedures, Guidelines, and Supporting Documents

- Conflict of Interest Declaration Form
- Annual Conflict of Interest Declaration Form
- Conflict of Interest Procedures
- Conflict of Interest Management Plan Template

### 6. References and Related Policies

- Code of Conduct
- Corrective and Disciplinary Actions Policy
- Research Misconduct Policy

### 7. Source, Responsible Office, Authority

This policy was developed by the Office of the Vice President Finance and Administration in collaboration with the Office of the Vice President Audit, Risk, and Compliance and the Office of Institutional Effectiveness. The policy was reviewed by the University Policy Committee and endorsed by the University Policy Officer and the University President. The Office of the Vice President Finance and Administration is responsible with overseeing implementation of this policy.