

Aidsfonds Conflict of Interest policy

The Conflict of Interest (Col) Policy is a key element to the governance and activities of Aidsfonds. It applies to the activities and relationships of external reviewers and committee members. Conflict of Interest of the Aidsfonds Board of Commissioners and Executive Board are described in the Articles of Association. Conflict of Interest of Aidsfonds staff is described in chapter 3.3 of the Integrity Policy for staff members¹.

What is a Conflict of Interest?

A Conflict of Interest arises when a committee member or reviewer has an interest that conflicts with the interests of Aidsfonds or in situations where a committee member or reviewer has divided loyalties (also known as a 'duality of interest'). Situations or transactions arising out of a Conflict of Interest can result in either a lack of integrity in the grant decision-making process or in the appearance of inappropriate financial gain.

An individual is considered to have a potential conflict of interest when:

- He or she or any family member² receives a financial or other significant benefit as a result of the individual's position at the organisation receiving a grant.
- He or she has the opportunity to influence the granting, administrative, or other material decisions in a manner that leads to a personal gain or advantage.
- He or she has an existing or potential financial or other significant interest which impairs or might appear to impair the individual's judgment in carrying out their responsibilities as a reviewer or committee member.

Examples of Conflict of Interest

The following activities illustrate types of potential or actual conflicts of interest that should be avoided and disclosed, as applicable, in accordance with this policy. The list is not all inclusive and is intended only to provide guidance.

- *Self-benefit:* Using your position as a reviewer or committee member to promote your own interests those of your family, or those of an organization you are affiliated with including use of confidential or privileged information acquired.
- *Influence peddling:* Soliciting benefits for yourself or your family from outside organizations in exchange for using your influence to advance the interests of that organization as a reviewer or committee member.
- *Other business relationships:* Advising on grants or reviewing proposals for organizations in which you or your family have a significant financial or other interest or relationship
- *False information:* Misrepresenting, withholding, or falsifying relevant information required to be reported to external parties or used internally for decision-making purposes, in order to derive personal or organizational benefits.
- *Dealings with grantees:* Personally accepting anything of value from organizations or individuals that have grant proposals pending from Aidsfonds.

¹ Integriteitsbeleid, gedragscodes en procedures voor goed werkgever- en werknemerschap. Stichting Aidsfonds- STOP AIDS NOW! – Soa Aids Nederland

² For purposes of the Conflict of Interest Policy, the term "family member" means any spouse, domestic partner, parents, siblings, children, any other relative who resides in the same household and any other familial relationship that could create the appearance of a conflict.

Notice of Conflict of Interest (Col)

Possible or apparent Conflict of Interests must be disclosed to the Aidsfonds secretariat.

- In case of family membership and duality of interest, a Conflict of Interest is assumed which means that a reviewer or committee member cannot review or discuss this particular proposal;
- In other cases the Aidsfonds secretariat will weigh the disclosed conflict of interest and follow-up accordingly (advise that a committee member recuses itself from the discussion on that particular proposal);
- Disclosed Conflicts of Interest of Committee Members are always listed by the Aidsfonds secretariat and shared with the other Committee Members.

Sanctions

- It is the role of Aidsfonds to act upon these signals and if necessary sanction members in the event that there is evidence of Col that is knowingly undeclared. Possible sanctions may include dismissal from the committee.
- If a breach of the Col policy has impact on grant selection, it is the duty of Aidsfonds to instruct a reviewer on whether the particular grant selection was appropriate.

Dissemination of Col policy

Aidsfonds shall provide all reviewers and committee members with a copy of this policy. For reviewers this will be done before they start reviewing the assigned proposals. For committee members the Aidsfonds secretariat will bring this policy to their attention at least once a year.