

Policy Name: Financial Conflict of Interest Policy

Policy Owner: CFO

Content Expert(s): Finance & Budget Manager

POLICY

Employees should conduct their affairs so as to avoid or minimize financial conflicts of interest and must respond appropriately when conflicts arise. To that end, this policy defines what a financial conflict of interest is, provides mechanisms for employees and the MPHI to manage those conflicts of interest that arise, and describes situations that are prohibited. Every employee has an obligation to become familiar with, and abide by, the provisions of this policy. If a situation raising questions of financial conflict of interest arises, an employee should discuss the situation with their supervisor and/or Human Resources within 5 days of becoming aware of the situation.

Employees, and specifically principal investigators or anyone who can influence research, need to ensure that they have no financial conflict of interest present. It is not only directly financial but could include influencing the work so that a family member benefits from the research outcomes. This policy is to protect the credibility and integrity of MPHI's work so that public trust and confidence is ensured.

Disclosure of Financial Interests

All employees are required to disclose their outside financial interests as defined below to MPHI on an annual and on an ad hoc basis, as described below.

a) Annual Disclosures

All employees who have the potential to influence research or funding outcomes, must disclose any financial interests that are related to the employee's project responsibilities to MPHI on an annual basis at the time of the employee's annual review. This will be accomplished by signing an annual compliance document which will be retained in their employee file in Human Resources.

b) Ad hoc Disclosures

In addition to annual disclosure, certain situations require ad hoc disclosure. If an employee begins a new project where there is a potential conflict of interest or circumstances change where an employee obtains a potential conflict of interest with an existing project, the employee must report the conflict of interest within 5 days.

MPHI is required to report the financial conflict to the appropriate funding agency as soon as discovered.

DEFINITIONS:

Family means any member of the employee's immediate family; specifically children, spouse and parents.

Financial Interest means anything of monetary value received or held by an employee or an employee's family, whether or not the value is readily ascertainable, including, but not limited to: salary or other payments for services (e.g., consulting fees, honoraria, or paid authorships for other than scholarly works); any equity interests (e.g., stocks, stock options, or other ownership interests); and intellectual

property rights and interests (e.g., patents, trademarks, service marks, and copyrights), upon receipt of royalties or other income related to such intellectual property rights and interests.

Financial Interest does NOT include:

- a) salary, royalties, or other remuneration from MPHI;
- b) income from the authorship of academic or scholarly works;
- c) equity interests or income from investment vehicles, such as mutual funds and retirement accounts, so long as the employee does not directly control the investment decisions made in these vehicles.

Financial Conflict of Interest means a financial interest that MPHI reasonably determines could directly and significantly affect the design, conduct or reporting of research.