

# ***FINANCIAL CONFLICT OF INTEREST POLICY FOR RESEARCH AND RELATED ACTIVITIES***

## **I. POLICY STATEMENT**

It is the intent of Auburn University to manage financial conflicts of interest of its employees as part of ongoing efforts to prevent outcomes that may be harmful to, sponsored activities, operation of regulatory compliance committees, technology transfer efforts, or the University at large. Therefore employees responsible for the design, conduct or reporting of sponsored Research and related activities or engaging in Technology Commercialization (Affected Employees) must report Significant Financial Interests and must work with the University to develop a plan to Manage Financial Conflicts of Interest as necessary.

## **II. POLICY PRINCIPLES**

The integrity of the University as a community of scholars requires the open exchange of ideas in an atmosphere free from financial conflict and undue influence. This is especially important in those cases where relationships with external parties could lead to circumstances adversely impacting scholarly work, integrity, judgment or the conduct of sponsored activities.

Auburn acknowledges that Affected Employees and their Immediate Family have the right to acquire personal financial assets and to establish financial relationships with outside entities. However, Affected Employees also have the responsibility to manage their financial affairs and relationships in a manner that does not interfere with, or improperly influence, the performance of their professional duties and responsibilities. As long as Significant Financial Interests are disclosed and financial conflicts are managed, reduced, or eliminated; they need not be a problem.

## **III. EFFECTIVE DATE**

January 1, 2015

## **IV. APPLICABILITY**

All Auburn University Affected Employees are required to report Significant Financial Interests held by themselves or by their Immediate Family which relate to the Affected Employee's Institutional Responsibilities. This policy and accompanying procedures are intended to provide guidance to Affected Employees in disclosure of Significant Financial Interests and to Auburn University officials in the management of financial conflicts. It is not intended to substitute for compliance with the Alabama code of ethics for public officials and employees (Code of Alabama 1975 Title 36, Chapter 25). Further, this policy supports Auburn University's compliance with Federal requirements to manage and or report certain financial conflicts of interest.

## **V. POLICY MANAGMENT**

**Responsible Office:** Office of Research Compliance

**Responsible Executive:** Associate Provost and Associate Vice President for Research

**Responsible Officer:** Vice President for Research and Economic Development

**VI. DEFINITIONS**

See Auburn University Procedures for Financial Conflicts of Interest Policy for Research and Related Activities & Procedures for Implementation of Auburn University's Conflict of Interest Policy as it applies to research and education activities funded by the National Science Foundation.

**VII. POLICY PROCEDURES**

See Auburn University Procedures for Financial Conflicts of Interest Policy for Research and Related Activities & Procedures for Implementation of Auburn University's Conflict of Interest Policy as it applies to research and education activities funded by the National Science Foundation.

**VIII. SANCTIONS**

The appropriate Dean, designated Associate Dean, Provost, or Vice President shall utilize the standard disciplinary procedures set forth as a condition of each person's employment with Auburn University to impose sanctions for violation of this policy and accompanying procedures. Other sanctions that might be imposed include but are not limited to:

- Retrospective Review and submission of a Retrospective Report to the appropriate responsible official and/or applicable sponsoring agency;
- Freezing expenditures from involved funds or terminating sponsored or other agreements;
- Revocation of the privilege for engaging in research, sponsored activities, technology transfer and commercialization and/or other scholarly activities;
- Removal from Compliance Committee membership; and/or
- Penalties if the Financial Conflict of Interest is determined to be in violation of the Alabama code of ethics for public officials and employees. (Code of Alabama 1975 Title 36, Chapter 25).

**IX. EXCLUSIONS**

N/A

**X. INTERPRETATION**

The authorized institutional representative is, for the purposes of this policy, the Vice President for Research and Economic Development.