



Faculty and Employee Conflict of Interest Policy at the European Graduate School

1. Purpose

The primary purpose of this policy is to protect the integrity of decision-making at the European Graduate School ("the EGS"), by stipulating guidelines to manage, reduce, and eliminate actual or potential conflicts of interest that could arise in the course of employment and faculty roles.

2. Scope

This policy applies to all EGS employees, including faculty, staff, administration, and part-time, contract, or temporary workers.

3. Policy Statement

- a. Conflicts of interest occur when an individual's personal, professional, commercial, or financial interests or activities outside of their EGS responsibilities have the potential to influence or appear to influence their decision-making within the EGS. It is not possible to list all potential conflicts of interest; however, the following are some examples:
 - i. consulting or other work outside the EGS that competes directly with the EGS's activities or draws on the same time and resources,
 - ii. owning or having a significant interest in a company that is doing business with the EGS,
 - iii. hiring, supervising, or making academic or administrative decisions about a family member or someone with whom the employee has a significant personal relationship,
 - iv. accepting gifts, favors, or kickbacks from a company or individual doing or seeking to do business with the EGS,
 - v. and conducting research for an entity from which the researcher receives a direct or indirect benefit.
- b. EGS personnel must always act in the best interests of the EGS and its students, and not let outside interests influence or appear to influence their EGS duties.

4. Disclosure

- a. All employees and faculty members are required to disclose any relationships, holdings, or interests that could potentially lead to a conflict of interest.
- b. This disclosure should be made to the president of the EGS, the chair, dean, supervisor, or other appropriate authority.

5. Management and Resolution

Upon disclosure of a potential conflict of interest, the EGS will determine the appropriate action to manage, reduce, or eliminate the conflict. This may include but is not limited to altering the reporting structure, divestment of the interest, or other remedies appropriate to the specific situation.



6. *Violations*

Violations of this policy may result in disciplinary action, up to and including termination of employment or faculty status.

7. *Policy Updates, Amendments, and Modifications*

- a. This policy will be reviewed periodically to ensure it remains relevant and effective. Any amendments will be made in accordance with the EGS standard policy review procedures. This policy is subject to change at the discretion of the EGS.
- b. This policy will be reviewed periodically and updated as necessary to reflect changes in EGS policies and procedures.
- c. Any changes to the policy will be communicated to students through the EGS websites and other means of official communication.

8. *Enforcement*

This policy does not preclude any obligations required by law or contractual agreement, nor is it intended to supersede any rights or obligations under those laws or agreements.