

## EVI Policies

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### Conflict of interest

#### 1. Background and scope

In order to achieve its mission, EVI closely collaborates with a wide range of different stakeholders, including vaccine developers from the public and private sector, funders, public authorities, international organisations, other non-profit organisations and many others. Moreover, EVI itself as an organisation has different governance and advisory bodies in which nominated individuals fulfil different functions and roles within EVI's operations and processes.

Potential Conflicts of Interest may therefore occur when an individual engaged with EVI has conflicting personal interests -related to family, financial, or social factors, for example- that could potentially compromise his/her judgment, decisions, or actions. EVI identifies itself as a non-profit organisation that works in the interest of global public health.

Furthermore, EVI operates predominantly with public funding or funding from charitable sources. EVI has always been committed to the highest standards of transparency, honesty, and accountability, and EVI strives to avoid any real, potential or perceived Conflicts of Interest. EVI has therefore developed and put into place a Conflict-of-Interest Policy and corresponding procedures.

This Policy applies to any member of the EVI Board and General Assembly, formal Advisory Bodies (e.g., Scientific and Strategic Advisory Committee, EVI Financial and Risk Management Committee), the EVI management team, and all Staff members as well as close Consultants). Acceptance of any collaboration with EVI requires that the needs and goals of EVI takes precedence, and any EVI Staff or Advisor must be aware that outside obligations, financial interest or employment relationships do not compromise their objectivity when serving EVI. Thus, in case of any of the aforementioned individuals, committee or board members having significant interests in a company, organisation or external institution, or receive compensation, funding, or other assistance from other entities than EVI, then such a relationship must be declared, and it will be evaluated whether this constitutes a disqualifying Conflict of Interest.

#### 2. Definitions

“Advisor” shall mean an individual providing independent, external advice on a non-employment basis.

“Advisory Body” shall mean a member of any Advisory Body to EVI.

“Affected Individual” shall mean EVI Board and General Assembly, formal Advisory Bodies (e.g., Scientific and Strategic Advisory Committee, EVI Financial and Risk Management Committee), the EVI management team, and all Staff members as well as close Consultants).

“Conflict of Interest” refers to a situation where an Affected Individual may have conflicting personal interests -related to family, financial, or social factors, for example- that could potentially compromise his/her judgment, decisions, or actions related to EVI.

“Consultant” shall mean a person working under a consultant contract with EVI.

“Disclosure Form” shall mean the Disclosure of Interests via the form included as exhibit to the present Policy.

“EVI Board” shall mean a member of the EVI Board.

“Financial and Risk Management Committee” shall mean a member of the Financial and Risk Management Committee.

“General Assembly” shall mean a member of the General Assembly.

“Policy” shall mean the present Policy related to dealing with Conflicts of Interest at EVI.

“Scientific and Strategic Advisory Committee” shall mean a member of the Scientific and Strategic Advisory Committee.

“Staff” shall mean a person working under an employment contract with EVI.

### 3. Scope

This policy applies to any member of the EVI Board and General Assembly, formal advisory bodies (e.g., Scientific and Strategic Advisory Committee, FRMC), the EVI management team, and all staff members as well as close consultants), or individuals that may enter into another relationship with EVI where this policy is considered relevant (“Affected Individuals”).

### 4. Conflict of Interest

Potential Conflicts of Interest may occur when Affected Individuals engaged with EVI have conflicting personal interests that could potentially compromise his/her judgments, decisions, or actions. Conflicts of Interest may be related, for example to the following factors (not exhaustive):

- Family
- Financial
- Social
- Others.

### 5. Disclosure

Affected Individuals have the obligation to disclose the existence of any potential or actual Conflicts of Interest in good faith and in line with the present policy and the procedures it describes. In such a situation, Affected Individuals are expected to complete and submit a Disclosure Form to the EVI Finance and HR Director. Also Affected Individuals where due to the specific nature of their relationship with EVI a Conflict of Interest may occur at one point in time (e.g., EVI staff, governance members etc), should complete and submit a Disclosure Form.

## 6. Procedure

- i) Disclosure Form is completed and submitted to the EVI Finance and HR Director
- ii) Receipt of Disclosure Form is confirmed by EVI Finance and HR Director
- iii) Disclosure Form is reviewed by EVI Finance and HR Director
- iv) If considered complete and satisfactory, Disclosure Form is filed.
- v) In case additional information is required, corresponding Affected Individual is requested to revise and re-submit Disclosure Form
- vi) Disclosure Forms will be reviewed as follows:
  - a. From EVI Board: Disclosure Forms will be shared with entire EVI Board and be reviewed during the next EVI Board meeting. The EVI Board will assess whether a Conflict of Interest exists or appears to exist.
  - b. For Disclosure Forms from all Affected Individuals other than EVI Board: Disclosure Forms will be reviewed by EVI Finance and HR Director who will assess whether a Conflict of Interest exists or appears to exist.
- vii) Depending on the outcome of the assessment of the Disclosure Forms, one or several outcomes and corresponding can occur, as decided by the EVI Board and EVI Finance and HR Director, respectively:
  - a. No actual, potential, or significant Conflict of Interest exists: no measures need to be taken
  - b. A potential or actual Conflicts of Interest is considered to exist: the following measures, or a combination thereof, may be suggested for application:
    - Conditional participation (subject to disclosure of the declared interest)
    - Partial exclusion (from meetings, information etc related to the declared interest)
    - Total exclusion (potentially including the request to renounce from his/her engagement with EVI).

In addition to the measures listed above, alternatives to address a Conflict of Interest may include, for example, changing an Affected Individual's role with EVI, or the request to an Affected Individual to terminate other relationships causing the Conflict of Interest related to EVI.

## 7. Renewal of Declarations of Interest

As situations and personal interests are likely to change over time, Affected Individuals will be requested to confirm and/or update their previous Interest Disclosure Form to the EVI Finance and HR Director on an annual basis. The review procedure as described under 6. Procedure will again be followed.

## 8. Gifts

As a general principle, EVI discourages the exchange of gifts. Affected Individuals may not receive or offer any gift or anything else of significant value (*e.g.*, services) with the intention of influencing directly or indirectly, the action of EVI or of the recipient.

Gifts received from vendors, suppliers, consultants, partners, etc. must be declined or given to EVI or shared with EVI generally. If acknowledgement is appropriate, they should be acknowledged on behalf of EVI. This Policy is not intended to prohibit normal business practices, such as meetings over meals, corporate items given to participants in meetings and conferences, or token hosting gifts, as long as they are of nominal and reasonable value (less than EUR 50) and promote EVI's legitimate business interests.

The exchange of gifts should also consider local custom and be in line with applicable laws and regulations. If an Affected Individual believes that there is an appropriate reason to make an exemption to this Policy for a specific situation, he/she should declare to his/her line management or directly to the EVI Finance and HR Director.

## 9. Policy update

The present Policy will be maintained by the EVI Finance and HR Director, subject to regular review by the EVI Board.

## 10. Communication

The present Policy is made available to Affected Individuals through the EVI databases or via direct mailing.

## 11. Exhibit – Conflict of Interest Disclosure Form

### Declaration Form for Conflict of Interest

Name: \_\_\_\_\_

Relationship with EVI: \_\_\_\_\_

Information on direct or indirect interests of relevance to the mission of EVI:

1. Direct interest (financial benefits arising from, for example, employment, contracted work, investments, fees, etc.):

*Please describe if applicable or state "Not applicable"*

2. Indirect interests (indirect financial, e.g., grants, sponsorships, or other kind of benefits):

*Please describe if applicable or state "Not applicable"*

3. Interests deriving from the professional activities of the member or his/her close family members:

*Please describe if applicable or state "Not applicable"*

4. Any membership role or affiliation that you have in organisations/bodies/club with an interest in the work of EVI:

*Please describe if applicable or state "Not applicable"*

5. Other interests or facts that the undersigned considers pertinent:

*Please describe if applicable or state "Not applicable"*

#### Declaration:

I declare on my word of honour that the information provided above is true and complete. I agree to immediately and truthfully declare to the General Assembly any changes, which may occur in the declaration.

Done at \_\_\_\_\_ on \_\_\_\_\_

Signature: \_\_\_\_\_