



## KECK GRADUATE INSTITUTE

*A Member of The Claremont Colleges*

# Conflict of Interest Policy

(Appendix A to the Code of Conduct)

## OVERVIEW

Transparency, accountability, and trust are fundamental to Keck Graduate Institute's (KGI) success. This Conflict-of-Interest Policy is designed to ensure that all members of the KGI academic community adhere to the highest ethical standards, avoid conflicts of interest, and maintain the integrity of the Institute's mission.

In certain situations, actual, potential, or perceived financial or personal conflicts, or the appearance of such a conflict, may arise between a member of the KGI academic community's outside interest or the interest of a related party and his/her obligation to the Institute. These conflicts may compromise or appear to compromise the individual's judgment, fiduciary duties, or the well-being of KGI. To address these concerns, this policy provides guidelines for identifying, disclosing, and managing conflicts of interest.

## Key Definitions

1. **Conflict of Interest:** A member's personal, financial, or other external interests or time commitments conflict with their obligations to KGI, potentially affecting their ability to act impartially or in the best interest of the institution
2. **Family Member:** This includes the spouse, domestic partner, parents, siblings, children, grandchildren, great-grandchildren, aunts, uncles, cousins, nieces or nephews and their spouse/domestic partners or any persons related by blood, adoption, or marriage to the employee individual residing in the same household as the member.
3. **Related Party:** Any individual or entity with whom the member has close association or connection with another entity, which could influence financial or operational decisions. Related parties can include an organization's directors, officers, or key executives, including spouses, children, siblings, and relatives.
4. **Substantial Interest:** A financial or ownership interest exceeding 35% in an entity that interacts with KGI.
5. **Spin-Off Companies:** Entities formed to commercialize intellectual property or other innovations developed within KGI.

## Policy Provisions

- A. Members may not have direct or indirect interest, financial or otherwise, of any nature or assume any duty to another entity that unreasonably interferes with the community member's duties to the Institute unless it has been fully disclosed and authorized by the appropriate authority at KGI as defined in section G of this document.
- B. No member or immediate family member shall accept or solicit any personal gift, interest, favor, or service that might reasonably influence the member in the discharge of

Effective Date: October 18, 2006

Amendment Date: August 20, 2012, September 19, 2012, and February 12, 2025

Administrator: Human Resources

Approval Authority: Conflict Monitoring Committee and Board of Trustees



## KECK GRADUATE INSTITUTE

A Member of The Claremont Colleges

his or her duties or that the member knows or should know is being offered with the intent to influence his or her official conduct on behalf of the Institute.

- C. A member must disclose all consulting or employment activities outside KGI that relate to their institutional responsibilities, and that may reasonably appear to create a conflict with KGI's mission and operations, including any time commitments that could interfere with their ability to fully dedicate the necessary time and attention to their KGI responsibilities
- D. No member shall disclose or use confidential information or opportunities gained because of his or her position at KGI or otherwise use such information for gain or benefit without advance disclosure and approval by the appropriate authority at KGI.
- E. No member shall transact any business on behalf of the Institute with any related person or business entity of which the employee or an immediate family member of the employee is an officer, agent, or member or in which any of them owns a substantial interest, without appropriate disclosure and approval of the appropriate authorities at KGI.
- F. Relationships between KGI and spin-off companies require prior disclosure and approval. The Board of Trustees must review specific terms related to intellectual property, licensing, and use of KGI facilities.
- G. Members must disclose in writing, in advance, or as soon as possible after becoming aware of them, all conflicts or *potential* conflicts of interest, including financial interests or other relationships in any matter or transaction involving the Institute, and all consulting arrangements that might relate to or interfere with their obligations to the Institute, that they or any of their related persons may have. Members must annually attest in writing that they have promptly made all necessary disclosures and have read, understood, and complied with the KGI Code of Conduct and the related policies and procedures (including this Conflict-of-Interest Policy).
- H. Potential conflicts related to sponsored research also must be reported on the *Statement of Outside Interests Related to Research form*.
- I. Submission of disclosures related to conflicts of interest, their review, and resolution are handled by the following appropriate authorities:
  - 1. Faculty and Staff disclosures must be submitted to Human Resources, and the office will notify the Cabinet-level supervisor. Material conflicts are investigated by the Conflict Monitoring and Intellectual Property and Tech Transfer Committee (CMIPTT), a joint faculty/staff committee at KGI. The President must approve CMIPTT's recommendations before they are effective, and together with conflict disclosures, these recommendations will be reported periodically to the Board of Trustees.

Effective Date: October 18, 2006

Amendment Date: August 20, 2012, September 19, 2012, and February 12, 2025

Administrator: Human Resources

Approval Authority: Conflict Monitoring Committee and Board of Trustees



## **KECK GRADUATE INSTITUTE**

*A Member of The Claremont Colleges*

2. In the case of an officer or trustee, disclosures must be submitted to the Chair of the Audit and Risk Management Committee (A&RMC) of the Board of Trustees. The Committee will investigate and submit recommendations to the Board of Trustees for approval.
  3. Once disclosed or reported, the conflicting or potentially conflicting activity must be avoided until considered and authorized by the appropriate designated authorities at KGI.
- J. Detailed Information on when and how to disclose potential, suspected, or actual conflicts of interest, as well as the process for review and action (if any) related to such conflicts, is outlined in Section IX of the Faculty Handbook.
  - K. If the CMIPTT, the A&RMC, or the Board allows a reported conflict or potential conflict of interest exception to exist, a conflict management plan must be prepared, and the conflict or potential conflict must be reconsidered at least annually and whenever modified in any material respect.
  - L. Management will present summary reports of all disclosures received and their disposition to the A&RMC and/or the full Board no less frequently than annually.
  - M. Records of all proceedings and deliberations related to conflict-of-interest matters will be prepared and maintained by the appropriate authorized body, consistent with the Institute's record retention policies.
  - N. Members are required to participate in the semi-annual conflict of interest surveys.

Members must comply with the Institute's conflict of interest policy and participate in the semi-annual conflict of interest surveys. Failure to do so is a serious matter that may result in disciplinary action, jeopardize grant eligibility, and terminate the member's relationship with KGI.

Effective Date: October 18, 2006

Amendment Date: August 20, 2012, September 19, 2012, and February 12, 2025

Administrator: Human Resources

Approval Authority: Conflict Monitoring Committee and Board of Trustees