

Rajitlal Institute of Management Sharjah (RIMS)

Conflict of Interest Policy

Version 1.0 (2025)

Policy authorized by Responsible Officer
8-11-2025



Introduction

This Conflict of Interests Policy supports the RIMS Ethics Code, in particular, the school's commitment to integrity, by encouraging the declaration of conflicts of relevant interests so that they may be appropriately managed.

Purpose and Scope

The purpose of this Policy is to encourage the disclosure and management of actual, potential or perceived conflicts of interest in order to protect the integrity and reputation of the school and its members.

The school acknowledges that its members will have various external interests, such as other employment, including consultancy work, charity trusteeships and membership of boards or public bodies. The intention of the policy is not to limit these roles but to ensure that interests are recognised, declared and where any conflicts of interest arise these are appropriately recognised and managed.

There are a wide range of situations in which conflicts of interest may arise and members of the school community must seek advice where necessary. Where applicable, references to conflicts of interest in this Policy should also be read as referring to conflicts of commitment and conflicts of loyalty, both of which are explained in Section 4.

This Policy applies to all RIMS employees, Council Members (including external members of Council Committees), visiting academics and registered students. Those to whom the policy applies will be made aware of it and will be encouraged to report any conflict of interest between the interests of the school on the one hand and personal, professional and business interests on the other so they may be appropriately managed. The policy seeks to promote the management of the perception of conflicts of interest as well as actual conflicts.

It is the responsibility of each individual to recognise situations in which questions of conflict of interest on their part might reasonably be raised, and to disclose such situations to the school by taking the appropriate steps identified in this Policy.

The Ethics Management Board (EMB) as a group of the School Management Committee (SMC), is responsible for the implementation of this policy and for ensuring that there are appropriate systems in place to promote and monitor compliance with it.

1. Definitions

An interest can be a financial or non-financial interest. Financial interests include remuneration (such as pay, commission, consultancy) and assets (investments, stocks, bonds, property). Non-financial interests include enhancement of career, education or reputation, access to privileged information or facilities.

Many of these interests will not compete with your duties and responsibilities to the school. However, where your obligations to the school are, or may appear, to be compromised, a conflict of interests occurs. A conflict of interest may arise where an individual might be seen to be influencing school matters for actual, potential or perceived personal benefit. Such a conflict may arise in a situation when a member of the school community is in a position to influence, directly or indirectly, school business, research, education or other decisions in ways that could lead to gain for them, their family or others.

For the purpose of this policy conflict of interests include the following types of conflict:

- a. Conflict of Interests: A conflict of interest arises where there is an actual or potential risk or a perceived conflict in duties between acting in the best interests of the school and formal and/or informal commitments, obligations or undertakings to another body/association/ affiliation in relation to the same or related matters;
- b. Conflict of loyalty: where overlapping personal interests or loyalties could, or be perceived to, prevent an individual from making a decision only in the best interests of the school;
- c. Conflict of commitment: where an individual's engagement in outside professional activity, paid or unpaid, involves a commitment of time that may conflict with their role and obligations to the school

A conflict of interest may relate your own interests or a connected person which means family, relatives or business partner or business in which you hold an interest.

2. Avoiding conflicts of interests

No one should be involved in making decisions in relation to their commitments to the school from which they, or anyone with whom they have a close financial or personal relationship, stands to personally benefit. In thinking about whether there is any conflict between decisions which they are making, and their own personal interests the common law test for bias is whether a fair-minded and

informed observer would have any reason to suspect that an individual's impartiality might be compromised.

Such considerations apply to a wide range of activities in which conflicts may arise, including, but not restricted to, student admissions, student assessment, disciplinary proceedings, appeals, staff recruitment, staff promotion and remuneration, procurement, and assessing proposed relationships between the school and outside parties.

Examples of situations in which conflicts of interest might arise, include:

- a. where there is actual, potential or perceived personal gain or gain to an immediate family/close contact/associate;
- b. where there is actual, potential or perceived financial gain which may be seen to influence action or decision making;
- c. where an individual is in a position whether actual, potential or perceived to directly or indirectly enhance their career or the career of others with whom they are personally associated;
- d. where there is actual, potential or perceived reputational impact for either the school or the individual personally.

Further examples are listed in Annex A.

Staff recruitment is an activity which requires additional transparency and careful management of interests. Therefore, additional School guidance is available on declaring and managing conflicts of interest and approvals required in relation to recruitment. All related interests must be recorded and a detailed record kept of how the conflict was managed.

In relation to external commitments that may create conflict, individuals covered by this policy should ensure that they do not enter into commitments or engage in activities which are inconsistent with their terms and conditions of employment for staff or terms of appointment for Council Members, with regard to outside activities and the permission required to engage with them. In the event of queries, individuals should seek advice from their line manager or the person to whom they report. Staff should also consult School policies and guidance on External Paid Activities.

3. When to declare a conflict

Every member of the school should act in accordance with the values of the Ethics Code and should therefore declare any interests that might lead to an actual, potential or perceived conflict of interest as soon as they are aware of them. An individual may not themselves determine whether there is a conflict and, if so, how it is managed. The school will be able to manage any actual,

potential or perceived conflicts of interest more easily and readily if they are aware of such conflicts from the outset. While an interest may not appear to give rise to a conflict, in the interests of transparency, it should be declared.

Where an individual covered by this policy is also a board member or director of any funding organisation proposing to fund an activity at the school there may be a potential conflict of interest. In such a situation, the individual should declare the interest to the Ethics Manager to ensure that any conflict of interest is managed in the funding acceptance approval process. It is recommended that funding board members also follow the Ethics Code and Conflict of Interest policy of the relevant funding body. This is important as board members' affiliations should be appropriately managed to ensure that decisions are not influenced, or be perceived to be influenced, by personal interests. Management of conflicts of interest will also limit the potential for reputational risk for both organisations.

Failure to disclose an interest, providing an incomplete or inaccurate disclosure, failing to seek approval or failing to appropriately manage a Conflict of Interest may constitute misconduct or a breach of terms and conditions of employment (for staff) or conditions of registration and may result in disciplinary action being taken by the school.

4. Declaring Interests and Conflicts of Interest

All employees should complete a declaration of interests. Staff can complete this declaration from the front desk. Council members and members on committees of Council are required to undertake an annual declaration of their interests. In addition, employees and Members of Council should disclose any changes to their interests as soon as they are aware of them.

Employees and Council members should not be involved in any decision-making process, including appointment panels, without having completed the declaration of interests

Whilst it is primarily the duty of the individual to declare all interests, others, such as a manager, colleague or other member of the school community may become aware of conflict of an actual, potential or perceived conflict of interest and should request that the individual declares their interests so that they can be managed appropriately.

To declare a conflict of interest:

- a. A declaration can be made in writing to the Head of Division or Department. The Head of Division or Department will then inform the Ethics Manager at ethics@rajitlal.com to ensure that the conflict is recorded.

- b. Conflicts of Interest relating to recruitment must be declared in accordance with the relevant recruitment policy and guidance.
- c. At any committee meeting or meetings of decision-making bodies including relating to recruitment – At the beginning of every School meeting, there should be a standing item on the agenda on conflicts of interest. Members should be invited to declare any conflict, either actual or perceived, that may arise in the course of the meeting. Any members that become aware of a conflict that they have not declared at the start of the meeting should do so as soon as they become aware of the conflict. The minutes of each meeting should record whether or not any conflicts were declared. The Chair of the committee should decide whether the member concerned can:
 - Fully participate in the business of the committee or board with no restrictions;
 - remain in the meeting where the conflict of interest is considered but not participate in discussions;
 - withdraw from the decision-making process in relation to the conflict of interest;
 - withdraw entirely from the particular committee or board where there is a significant or ongoing conflict.

If the Chair has a conflict, the committee should agree for the Deputy Chair or another appropriate member to act as Chair for the relevant item.

In respect of Council members, additional provisions for the management of members (including the Chair) actual, potential or perceived conflicts of interests and conflicts of loyalty should be followed. A conflict of loyalty may occur where a Council member's loyalty or duty to another person or organisation could prevent them from making a decision only in the best interests of the school. Members of Council should be mindful of the potential for bias in decision making and, with the School Secretary, should consider whether there is the potential for actual or perceived bias in fulfilling their various roles at the school.

In order to report on the operation of this policy all declarations of conflicts of interest should be reported to the Ethics Manager. These should include details of the facts, who undertook the assessment and what action was taken as a result.

5. Assessing and Managing Conflicts of Interest

All declared actual, potential or perceived conflicts of interests should be reviewed considered by the Head of Division or Department or Committee Chair

(as appropriate). Where the declaration relates to a specific activity it must be assessed accordingly:

- i. Recruitment: HR partner with the Vice Chair of the Appointments Committee or Pro Director Faculty Development
- ii. Education (e.g. relating to Assessment): Pro-Director Education and Academic Registrar (via the Ethics Manager)
- iii. Commercial and Innovation: RIMS Innovation Team (innovation@rajitlal.com)
- iv. Research: Research Governance Manager (research.ethics@rajitlal.com)

The reviewer should determine what, if any, further action is required. Individuals should not determine how to appropriately manage their own declarations.

It is important to note that considering conflicts of interest involves a spectrum of directness and significance. Several factors may need to be considered when assessing the seriousness of the conflict of interest and potential for bias. These include but are not limited to:

- a. The seriousness of the actual, potential or perceived conflict;
- b. how closely the two interests are related to each other;
- c. the magnitude of the actual, potential or perceived effect of one on the other;
- d. the nature or significance of the particular decision or activity being carried out;
- e. the extent to which the individual's other interest could actually affect or be perceived to affect the school's decision or activity;
- f. the nature or extent of the individual's current or intended involvement in the school's decision or activity.

6. Potential Outcomes

No Conflict Exists

- Where the Head of Department or Service Leader or Committee Chair determines that there is no conflict of interest, this should be formally recorded and reported to the Ethics Manager. An explanation and any supporting documentation should be included as to why it was concluded that no conflict arose.
- In the instance that the overlap of two or more interests is so slight that it does not constitute a real conflict of interest, for example, where the connection between the interests is remote or

insignificant, then it may be determined that such interests do not represent a conflict.

Conflict Does Exist

- Once a conflict of interest is deemed to exist the Head of Department or Service Leader or Committee Chair will determine the appropriate resolution. These may include:
 - Continue: be permitted to continue, where the conflict is considered to be insignificant;
 - Continue with exemption: seek a formal exemption to allow participation (if such a legal power applies);
 - Continue with restrictions or additional oversight: additional oversight or review over their activity in relation to the particular project;
 - Withdraw: for the individual to withdraw from any discussions in relation to the particular project or from making any decisions in relation to the particular project;
 - Reassign: refer the decision, tasks or duties to others; or
 - Relinquish: for the individual to stand aside from any involvement in the particular project.

Heads of Department or Service Leaders or Committee Chairs or other reviewers may seek advice or refer any unresolved matter to the School Secretary through the Ethics Manager.

7. Commercialisation, innovation and managing conflicts

The school is committed to enhancing the impact of research, which may involve commercialising research through licensing or creating spin out companies. RIMS Innovation have developed guidance on commercialisation governance which includes the following section to assist in the identification and management of a conflicts that can occur. For further support contact innovation@rajitlal.com

If a staff member has an interest in a spin out company or other commercial venture connected to their RIMS work there is the potential for a conflict of interests. A conflict-of-interest management plan must be to be developed by the RIMS member with assistance from RIMS Innovation. Most spinout companies have RIMS staff or students in their operations, and we must take precaution in the following scenarios –

- i. Financial conflict of interest: arises when a RIMS member involved in a commercialisation transaction has ways to benefit financially from the licensee directly or indirectly. Such financial Conflict of Interests is to be reported here, as well as subsequently in annual declarations of Conflict of Interests. Note that a RIMS member's equity percentage ownership in an outside entity is not as important as the nature of the personal involvement. For example, a staff member may own 100% of a company that conducts private leasing of her properties, which would not be a significant Conflict of Interest issue even if the company licenses a RIMS algorithm to optimise its leasing operation. However, when a RIMS researcher is also shareholder of a licensee company (the Principal Investigator - PI - whose work is to be licensed to the licensee company, who is also a shareholder and cofounder of the company) directly participates in the negotiation of the licensing deal, then the person is acting on both sides of the transaction. He/she is a RIMS beneficiary of the licensing deal because of a share of the licensing income (per our IP Policy), and is also a company representative negotiating with RIMS on the deal who will gain financial benefits as a company shareholder. In such an instance we would require that another non-conflicted company executive (preferably a CEO with no RIMS ties; or for very early-stage company without any non-conflicted personnel a lawyer) to negotiate and conclude the licensing deal.
- ii. Conflict of interest on decisions over personnel or other matters:
 - a. Conflict of interest on personnel – when the conflicted RIMS member supervises the same lower-rank staff or students at RIMS and also at the outside entity, a Conflict of Interest (Col) management plan would need to be developed by the conflicted RIMS supervisor, and endorsed by RIMS Innovation and the department/centre head of the involved staff being supervised, and acknowledged by the affected RIMS member being supervised. In a Col Management Plan, the following principles are to be carefully adhered to:
 - No free labour: the supervised cannot volunteer or work at a discount for the outside entity in question, and a clearly drafted consultancy contract is always a good way to ensure all terms are documented and transparent.
 - No hidden/forced transfer of IP rights/usage: There should be no hidden transfer of IP from RIMS to the outside entity in question. For example, the supervised should not be asked to re-apply the

same IP or know-how being developed on campus to tasks at the outside entity in question. To lower such risks, it is suggested not to have too much overlap between what is done on campus and what is done for the outside entity, and explain why the concern over a hidden transfer of IP is not warranted.

- Freedom of choice; no blocked degree/career for the supervised: Under no circumstances should any outside or commercial work be considered as a requirement for a RIMS student/staff's degree completion or career advancement consideration. They must be offered a choice to complete their RIMS objectives – a course/degree completion or maintaining their job at RIMS – without working for the outside entity in question.
 - b. Conflict of interest on licensing negotiation (this section is listed here in case the RIMS principals are also involved in the creation of licensed RIMS IP; otherwise they are free to represent the spinout when negotiating general terms with RIMS Innovation.) Because the author/inventor of a RIMS innovation would receive future licensing income from the licensee company, it is inappropriate for that conflicted author/inventor to represent potential licensee to negotiate licensing terms with RIMS Innovation. For such a transaction, it is suggested to have a commercial representative (company's CEO, chairman, or company lawyer or legal counsel) to conduct the negotiation.
 - c. Conflict of interest on other matters – such as business opportunities that should be brought to RIMS's attention in the first instance, before being taken outside by the related third party under review here.
- iii. Outside Work – outside work is regulated by employment terms and conditions and separate additional guidance is available for senior staff (available from HR), and any new outside activity may trigger a duty to report it.

Annex A: Examples of Interests and potential conflicts of interests

The following examples highlight where roles, activities or relationships should be declared and potential conflicts that may arise.

Interests

- **Paid employment:** This includes self-employment, offices held (such as public appointments) or employment where regular income is received and should be declared. Staff should refer to their terms and conditions and ensure the necessary permissions are gained.
- **Directorships:** All paid directorships and unpaid directorships interests should be declared.
- **Land:** Other than a home used solely for personal accommodation, Council members, governors and employees are asked to declare personal or commercial property which may lead to an association with the school. This includes leasing or renting to or from the school, living in School buildings or buying or selling property to or from the school.
- **Other:** Interests that do not fall into the above categories but may give rise to a conflict. For example, unremunerated interests, positions of authority held or other significant involvement in other organisations, e.g. charitable or political or other educational bodies. It is particularly important for members of the governing body and senior management involved in procurement to disclose interests they have in, or with, any organisation from whom the University procures goods or services. Where the interest is of relevance to the business of Council or one of its committees, the declaration shall be made as soon as practicable either at the meeting or in advance to the Chair or School Secretary.

POTENTIAL CONFLICTS OF INTERESTS

- **Research projects and commercial entities** Where a research project is expected to generate data/findings that have commercial value, and in the event that such commercial value is realised, the individual stands to profit personally through involvement in an associated company or partnership. A conflict management plan should be developed with RIMS Innovation.
- **Trustee benefits:** Trustee benefit is any instance where money or other property goods or services which have monetary value are received by the trustee. The law says that trustees cannot receive a benefit from their charity unless they have an adequate legal authority to do so. This does not include:
 - reasonable expenses that Council Members are entitled to claim;
 - remuneration and salary-related benefits that are provided for in the employment contracts of members of staff who are also Council Members.
- **Education: Admissions, supervision and assessment**
Where a member of staff has a relationship with any individual that will lead to a conflict of interest relating to admissions, supervision or

assessment it must be declared. For example, if a family member applies or is studying at the school.

- **Personal Relationships**

RIMS prohibits any personal relationships between staff and students where:

1. there is a direct supervisory relationship in existence
2. a member of staff has direct or indirect responsibility for, or involvement in, that student's academic studies (for example, assessor of a student's work) and/or personal welfare (for example, academic advisor and advisee) or
3. a member of staff interacts with a student as part of their role (including the period during which a prospective student is applying for admission, and any period of time after the completion of a degree during which the staff member maintains a direct or indirect professional role, such as mentoring or writing references for a former student).

Such relationships should be reported immediately in accordance with the procedure set out in the School's Personal Relationships Policy so that appropriate safeguards are put in place, including changing the supervisory relationship or the relationship of direct responsibility for, or involvement in, the student's academic studies and/or personal welfare

- **Staff: Recruitment, allocation of duties or promotion** No member of staff should be involved in decisions relating to the recruitment or assessment, allocation of duties or promotion of any individual with whom they have a personal relationship. Recruitment policy and any additional guidance must be followed.

Report Conflict of Interest

By email: ethics@rajitlal.com

By post: For the attention of the Director of Quality, Training and Development
2nd Floor, Al Majaz Pearl Building,
North Park Street, Jamal Abdul Nazer Road, Al Majaz 2, Sharjah, UAE.

By phone: +971 504960480

Opening hours: 9am-5:00pm (GMT) Mon-Fri