

# **BORNE'S CONFLICTS OF INTEREST POLICY**

Current as at 6 May 2020

## **Introduction**

Borne's Conflicts of Interest policy applies to all employees, all Trustees and all external members or co-opted individuals who join Borne's committees and workgroups including scientific advisors and external peer reviewers.

The Conflicts of Interest policy sets out your responsibilities for identifying, declaring and managing actual and potential conflicts of interest when acting on behalf of Borne. Its purpose is to protect Borne and those who work for it from any perception, real or otherwise, that the external interests and affiliations of its committee members might interfere with their ability to contribute impartially to the fulfilment of the charity's objectives.

A conflict of interest is any situation in which your personal interests and loyalties (be it financial, non-financial, organisational, collaborative, personal or other) may, or may appear to, unduly influence or affect a decision or outcome of a grant application.

## **Principles**

It is important to ensure that all decisions made by office-holders and committee members on behalf of Borne are in the charity's best interests, free from any undue external influence and which does not pose any reputational risk to Borne. You are expected to act with integrity and impartiality, and to be open, fair and unbiased when making decisions or advising Borne.

Outside interests and expertise are important to support and challenge Borne's work, but it is inevitable that conflicts of interests will arise. It is important that they are clearly identified and carefully managed through:

- Disclosure of outside interests that could give rise to potential conflicts so that Borne are aware of these in advance;
- Determination of whether there is an actual or perceived conflict before becoming involved in any decision on behalf of Borne; and
- Management of any conflicts as they arise in a manner that protects the integrity of Borne's decision-making while exercising personal judgement in permitting the right level of input to enable the best decisions.

## **Disclosure of interests**

Borne's **Declaration of Interest form** should be completed within a month of a new appointment and reviewed annually.

They include :

- the declaration of financial interests through remuneration, directorships and significant equity interests in any companies or businesses with an involvement in pharmaceuticals, healthcare, biotech or related areas where there is 5% or more ownership of issued share capital;
- unremunerated activities related to those of Borne;
- membership of political pressure groups or associations where there are objectives related to the activities and objectives of Borne;
- family interests which might be considered to have a potential to include the exercise of impartial judgement in connection with Borne; and
- donations made to Borne.

All disclosed interests will be noted on Borne's **Disclosure Register** maintained by the Chief Operating Officer. Access to disclosures will be restricted to those who need it for the purposes of this policy.

## **Determining whether an actual or perceived conflict exists**

It is the responsibility of the individual to consider whether there is any actual or perceived conflict with any proposal that Borne is considering relating to Borne's charitable, operational or scientific activities as soon as the proposal is known.

In considering whether a conflict arises, the interests of any 'Connected Person', ie. Spouse, children, anyone living in the same home where information is shared about interests, anyone whose financial affairs are managed or controlled by you, should be treated as your own interests.

Any actual or potential conflicting interest (material or otherwise) should be discussed with the respective committee or board Chair and the COO in the role of Conflicts Manager as needed. Matters will be referred to the Chairman of the Board, as needed, in deciding on a course of action.

## **Managing conflicts of interest**

Should an actual or perceived conflict of interest be declared, you should withdraw from any consideration of the proposal or matter arising in question and retire from the meeting when the proposal or matter is discussed and assessed. You should not receive any documents pertaining to the matter, and details of discussion of the matter should be deleted from any papers that you receive.

Where the chair of the board or committee is related to the proposal, application or matter that is being considered, he or she must declare an interest and not be involved in that round of meetings. A vice chair will assume the relevant responsibilities to the chair in that instance.

## **Resolving conflicts of interest**

Borne recognises that the majority of actual, perceived or potential conflicts of interest will relate to a particular issue or proposal, and as such, will not present any long term restrictions on an individual's ability to work for the charity or contribute as a member of a committee.

In the rare circumstance where a major conflict of interest may arise which compromises an individual's ability to continue in their position on a committee or board, the matter will be discussed by the Chair of the Committee and the COO with escalation to the Chairman of the Board for a resolution.

## **Conflicts of Interest Policy Review**

Declarations of Interest should be reviewed annually. Borne will endeavour to review the Conflicts of Interest policy as required and at least every two years in consultation with the Board of Trustees.