



African Population and Health Research Center

Transforming lives in Africa through research.

CONFLICT OF INTEREST POLICY

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1. Background and Introduction

The African Population and Health Research Center ('APHRC' or 'the Center') is a premier research-to-policy institution, generating evidence, strengthening research and related capacity in the African research and development ecosystem, and engaging policy to inform action on health and development. The Center is Africa-based and African-led, with its headquarters in Nairobi, Kenya, and a West Africa Regional Office (WARO) in Dakar, Senegal. APHRC seeks to drive change by developing strong African research leadership and promoting evidence-informed decision-making (EIDM) across sub-Saharan Africa.

To fulfil its mandate, APHRC works with a wide range of persons both within and outside the organization. One of the core values of the Center is integrity and it is of utmost importance that these persons be and are perceived to be of the highest integrity and acting with right motives.

The Board of APHRC (hereinafter referred to as "the Board") is responsible for the long-term success of the Center. The Board recognizes the importance of setting out a formal and transparent procedure for addressing conflicts of interest responsibly and balancing the interests of all individuals involved in a proactive manner.

2. Policy Statement

APHRC upholds the highest standards of ethical behaviour in all its engagements with individuals and institutions. Every APHRC representative has a duty of loyalty and a duty of care to APHRC and shall make every effort to avoid being in a situation where personal interests conflict or appear to conflict with their official duties.

3. Purpose

The purpose of this policy is to establish clear guidelines and procedures for identifying, preventing, reporting and managing conflicts of interest at APHRC. The policy aims to ensure impartial decision-making within the Center, promote a culture of transparency and fairness and encourage self-declaration of conflicts of interest.

4. Scope

This policy applies to all individuals associated with APHRC (herein referred to as 'APHRC representatives') including but not limited to:

- Board members and Board committee members
- Staff (regular, temporary, volunteers and interns)
- Consultants
- Partners
- Advisors
- Fellows
- Contractors and suppliers

5. Guiding Principles

This Conflict of Interest Policy is underpinned by the following key principles:

- **Transparency:** All conflicts of interest will be disclosed openly and honestly.
- **Objectivity:** Decisions and actions will be based on the best interests of APHRC and its mission.
- **Accountability:** Measures will be put in place to ensure compliance with the policy and that individuals are held accountable for their actions including recognizing positive behaviors.
- **Consistency:** The same standards and procedures shall be applied to all conflicts of interest, regardless of the status of the individuals involved.
- **Proportionality:** The response to a conflict of interest should be proportionate to the severity of the conflict.
- **Full disclosure:** Individuals will be required to honestly and transparently disclose any potential conflicts of interest that may arise in their roles within the organization
- **Ease of reporting:** Clear and accessible reporting procedures will be established, allowing individuals to declare personal conflict of interest and, for reporting conflicts of interest confidentially and without fear of retaliation.

6. Definitions

“Conflict of interest” a conflict of interest arises when an individual's personal interests (which may include financial, personal, or professional relationships) could potentially influence, or be perceived to influence, their decisions or actions in a way that is contrary to the best interests of APHRC. Conflicts of interest can be:

- **Actual:** A direct conflict exists.
- **Potential:** A conflict could arise in the future.
- **Perceived:** A reasonable person might believe a conflict exists, even if it does not.

Examples of conflicts of interest include, but are not limited to:

- An individual making a decision that directly benefits themselves or a close family member.
- An individual using confidential organizational information for personal gain.
- An individual's involvement in a competing organization.
- Accepting gifts or benefits that could influence decision-making.
- Conflicts arising from APHRC's Broker or Intermediary Roles: APHRC's role as broker or intermediary agent (e.g., Fund Manager) can create unique opportunities for conflicts of interest. For example:
 - APHRC staff members may have financial interests in project proposals they are reviewing for funding or in a competing institution or project;

- APHRC staff members may have personal relationships or business interests with individuals or institutions that are competing for funding from APHRC;
- APHRC staff members may have family members or friends who are involved in a project that is being considered for funding;
- APHRC staff members may have a financial stake in a project that APHRC is funding, potentially leading to a conflict of interest in the evaluation and allocation of funds.

“Family member” for purposes of this policy may include:

- **Spouse and Domestic Partners:** This includes persons to whom one is legally married or domestic partners or cohabiting individuals who share a significant relationship with the person to whom the policy applies.
- **Children:** This includes biological offspring or adopted children of any age.
- **Parents:** This includes biological and adoptive parents.
- **Extended Family Members:** This includes siblings, aunts, uncles, cousins, nieces, nephews and grandparents.
- **In-laws:** This includes parents in law, spouses of siblings, children and other immediate family members.
- **Dependents:** This includes individuals who are financially dependent on the person to whom the policy applies, such as stepchildren or other relatives living in the same household.
- **Legal Guardians:** This includes legal guardians or individuals with custodial responsibilities for minors or incapacitated adults.

7. Duties Relating to Conflict of Interest

Duty of Care: Every person to whom this policy applies shall perform his or her duties at APHRC in good faith and with the degree of care that an ordinary prudent person would exercise under similar circumstances.

Duty of Loyalty: Every person to whom this policy applies must act with loyalty to APHRC, meaning that no such person may use his or her position with APHRC to make personal profit or gain other personal advantage. No person may personally take advantage of a business opportunity that is offered to APHRC.

Duties Relating to Reporting Conflict of Interest

Every person to whom this policy applies shall:

- i. Abide by the key policy principles outlined in Section 5;
- ii. Disclose all actual and potential conflicts as set out in Section 8; and
- iii. Comply with any action resulting from enforcement of this policy on management and resolution of conflict of interest.

8. Disclosure Requirements

All individuals covered by this policy are required to disclose any actual, potential, or perceived conflicts of interest as soon as they become aware of them.

8.1 Initial Disclosure

- 8.1.1 Potential APHRC staff members will be required to fill out a short conflict of interest statement (Appendix A) before being interviewed.
- 8.1.2 Upon joining APHRC, individuals must complete and sign a Conflict of Interest Disclosure Form (Appendix B).
- 8.1.3 Potential partners, contractors, suppliers and consultants will be required to complete and submit a Conflict of Interest Disclosure Form (Appendix D) as part of the initial engagement process and at renewal of contract.
- 8.1.4 Members of the Board and of Board Committees will be required to complete and submit a Conflict of Interest Disclosure Form (Appendix B) upon appointment.

8.2 Annual Disclosure

Once every year, all members of the Board, members of Board Committees and APHRC staff must complete and sign the annual Conflict of Interest Disclosure Form (Appendix xxx)

8.3 Ongoing Disclosure

- 8.3.1 Any new conflicts of interest that arise during the course of an individual's association with APHRC must be disclosed immediately through Appendix C (for Board members and staff) or Appendix D (for partners/consultants/ contractors/suppliers).
- 8.3.2 All disclosures involving a transaction, arrangement or decision being considered at any meeting or gathering within APHRC shall be made to all parties present at such a meeting or gathering. The declaration shall be recorded in the minutes/report of the meeting.

9. Evaluation and Management of Conflicts of Interest

9.1 Conflicts Involving Board and Board Committee Members

The Board Audit Committee shall evaluate all conflict of interest declarations made by Board members and members of Board committees to determine the existence or not of a conflict. The evaluation of conflicts of interest will entail rating the risk (low, medium or high).

The Committee will make recommendations for appropriate action including suggestions for removing the conflict from the situation.

The Audit Committee may develop procedures/guidelines for resolution of low risk conflicts of interest declared by Board and Board Committee members.

9.2 Conflicts Involving Staff and Other APHRC Representatives

The Conflict of Interest Officer shall evaluate conflict of interest declarations (except those made by members of the Board and Board Committees). The evaluation of declarations will entail determining whether a conflict exists or not and if it does, the risk level (low, medium or high). The risk rating and recommended actions will be based on a guideline developed by the Conflict of Interest Resolution Committee and approved by the Executive Leadership Team.

9.3 Management of Conflicts of Interest

Potential, perceived and actual conflicts of interest will ordinarily occur but they must be handled transparently and managed appropriately. Conflicts of interest must be identified, declared, recorded and managed.

- a) **Identifying Conflict of Interest:** Due to the nature of work and engagements at the Center, it is incumbent upon every person to consider, declare or report any actual, potential or perceived conflict of interest.
- b) **Declaring and/or Reporting Conflict of Interest:** Conflicts of interest may be self-declared or reported by concerned persons by bringing them to the attention of the Board Chair through the Board Secretary (for Board members and members of Board Committees) or the Conflict of Interest Officer (for staff and other APHRC representatives). Once a conflict of interest is identified, it must be declared or reported within three working days.

For reported conflicts, additional provisions will apply as per the Center's Whistleblowing Policy. The Safeguarding Manager will ensure that conflict of interest reports are forwarded to the Conflict of Interest Officer in a timely manner.

- c) **Recording Conflict of Interest:**

- i) Annual and incidental conflict of interest disclosures relating to staff and other APHRC representatives (not Board and Board Committee members) shall be recorded on the appropriate form and filed by the Conflict of Interest Officer in a central register.
 - ii) The Board Secretary shall receive and record all incidental and annual conflict of interest disclosures from Board and Board Committee members. Where a conflict of interest is disclosed, the Board Secretary will share the individual form with the Board Chair for transmission to the Audit Committee for evaluation.

- d) **Assessment and Resolution of Conflict of Interest:** Conflicts of interest shall be assessed and/or resolved at three levels:

- The Conflict of Interest Officer:
 - i) by reviewing all declared conflicts by APHRC representatives other than Board or Board Committee members and making a determination about the existence of a conflict

- ii) by rating the conflicts deemed present from i) as either low, medium, high
 - iii) by making recommendations to resolve conflicts rated low risk. The Officer will report such decisions to the Resolution Committee on a quarterly basis.
 - iii) by making recommendations for action to the Conflict of Interest Resolution Committee for conflicts rated medium or high risk.
- The Conflict of Interest Resolution Committee - by reviewing conflicts of interest rated medium or higher by the Conflict of Interest Officer and their recommended actions and making final recommendations to the respective decision makers. On a biennial basis, the committee shall review a sample of conflicts deemed low risk by the Conflict of Interest Officer.
- Additional investigations will be carried out by the Internal Auditor if necessary at the recommendation of the Conflict of Interest Resolution Committee. The Center may retain an independent investigator for matters that involve external parties. Reports from such investigations will be submitted to the Conflict of Interest Resolution Committee for further discussion.
- The Board Audit Committee - by rating all conflicts declared by Board members including the Executive Director and Board Committee members and making recommendations on resolution of such conflicts. The Audit Committee will also assess and make recommendations to resolve conflicts relating to Board operations.

The Chair of the Audit Committee may dispense with a declaration where in his/her assessment, the declaration does not disclose a conflict of interest or where it is categorized as low risk. Such a decision will be reported to the Audit Committee at the next sitting.

- e) **Documentation:** The committees will maintain detailed records of conflicts of interest, including the assessment, mitigation strategies and resolution outcomes.
- f) **Appeal Process:** Employees or individuals who disagree with the Conflict of Interest Resolution Committee's decision have the right to appeal within seven working days. The appeal will be reviewed by a higher authority within the organization, such as the Executive Director or designate.

10. Disallowed Transactions

The following transactions are not permitted:

10.1 Self-Dealing Transactions

Any transaction where a person to whom this policy applies directly benefits from a business deal with APHRC in a manner not permitted by other policies, or where they represent both sides of a transaction. This includes, but is not limited to:

- **Direct Purchase or Sale of Assets:** The purchase or sale of any assets (e.g. real estate, equipment, intellectual property) save as provided in the Procurement Manual, the Asset Disposal Guidelines or in any other policy.

- **Services Provided to the Center:** Entering into contracts where a Board member, staff or their immediate family provides services to the Center (e.g. consulting or contracting work) outside of their regular employment duties and compensation structure.
- **Undisclosed Business Interests:** Conducting business with or through a company or entity in which a Board member, staff or their immediate family has a significant financial interest, unless such interest is fully disclosed and approved in writing prior to any transaction. For Board and Board Committee members approval will be by the Board of Directors or a Board designated committee while for staff, approval will be by the Executive Director.

10.2 Use of Assets for Personal Gain

The unauthorized personal use of the Center's resources or information for individual financial benefit or the benefit of an immediate family member is strictly forbidden. This includes:

- **Misappropriation of Funds:** Using the Center's funds or credit cards for personal expenses contrary to prevailing policies.
- **Diversion of Business Opportunities:** Taking advantage of business opportunities discovered through the use of the Center's property, information or position for personal gain, rather than presenting them to the Center.
- **Unauthorized Use of Intellectual Property:** Using the Center's trademarks, copyrights, patents, or trade secrets for personal commercial ventures.

10.3 Acceptance of Gifts or Bribes

Board members, staff and their agents are prohibited from accepting gifts, favors, entertainment, or any other item of value that could be perceived as influencing business decisions from current or potential business partners, vendors, or competitors. This prohibition extends to:

- **Cash or Cash Equivalents:** The acceptance of any amount of cash is strictly prohibited.
- **Excessive Gifts:** The acceptance of gifts exceeding a nominal value (herein defined to mean US\$ 50) that could be construed as an attempt to influence a decision is prohibited.
- **Bribes or Kickbacks:** Any offer or acceptance of payment or inducement to influence a business decision is prohibited.

10.4 Insider Trading

The use of confidential or proprietary information obtained through one's position within APHRC for personal financial gain, or to enable others to gain, is strictly prohibited. This includes disclosing confidential information to others who then use it for their personal financial gain.

11. Conflict of Interest Management Organs or Authority

This policy establishes the role of the Conflict of Interest Officer and the Conflict of Interest Resolution Committee as institutions mandated to implement the policy. These organs will complement the role of the Executive Director and the Board Audit Committee in managing conflicts of interest at the Center.

Conflict of Interest Officer

The Conflict of Interest Officer shall be appointed by the Executive Director. They will be appointed and execute their role based on the Terms of Reference described in Schedule 1.

Conflict of Interest Resolution Committee

The Conflict of Interest Resolution Committee is charged with the responsibility to conclusively evaluate all situations that pose potential conflicts of interest in line with the provisions of this policy and is principally tasked with the management and resolution of conflict of interest situations (except those involving members of the Board and Board Committees). The committee will be composed of APHRC staff appointed by the Executive Director. The committee composition and work shall be guided by the Terms of Reference in Schedule 2.

Executive Director

The Executive Director shall:

- Appoint or designate a Conflict of Interest Officer;
- Appoint or designate members of the Conflict of Interest Resolution Committee;
- Make final decisions on the management of high-risk conflicts of interest on the recommendation of the Resolution Committee;
- Make final decision on appeals of decisions made by the Conflict of Interest Resolution Committee;
- Oversee the implementation of this policy on behalf of the Board;
- Ensure that staff are trained and sensitized about the policy on a regular basis
- Perform any other function outlined in this policy.

Board Audit Committee

The Board Audit Committee shall:

- a) Make decisions and issue final directions on the management of conflicts of interest arising from Board operations or among Board and Board Committee members;
- b) Receive and adopt the annual reports of meetings of the Conflict of Interest Resolution Committee;
- c) Review and recommend for approval the Conflict of Interest Policy and its subsequent revisions.

12. Training and Sensitization on Conflict of Interest

12.1 Training

- **Initial Training:** All new staff will undergo mandatory training on the Conflict of Interest Policy as part of their onboarding process. This training will cover:
 - Ethical conduct
 - The definition of conflict of interest.
 - Examples of actual, potential, and perceived conflicts.
 - The disclosure process and requirements.
 - Consequences of non-compliance.
 - Relevant procedures and guidelines.
- **Annual Refresher Training:** All existing staff will participate in annual refresher training sessions. These sessions will reinforce key principles of the policy and address any updates or changes.
- **Targeted Training:** Specific departments or roles that are at a higher risk of encountering conflicts of interest may receive additional targeted training tailored to their specific operational context.

12.2 Sensitization

- **Communication Campaigns:** Regular communication campaigns will be conducted through various channels, including email, internal newsletters, and intranet announcements, to raise awareness about conflict of interest.
- **Policy Accessibility:** The Conflict of Interest Policy and all related documents will be readily accessible to all APHRC representatives.
- **Managerial Responsibility:** Managers and immediate supervisors are responsible for sensitizing their teams on the Policy and ensuring that all team members understand and comply with its provisions. They should also be prepared to address initial queries and direct individuals to appropriate resources.

13. Board Responsibilities

The Board will have overall responsibility for:

- Fostering a culture of transparency and ethical conduct within APHRC.
- Development of a comprehensive conflict of interest policy.
- Ensuring that the conflict of interest policy remains relevant and effective. This involves periodic review and updates to reflect changes in legal requirements, industry best practices, and the Center's operations.
- Overseeing the proper implementation and enforcement of the conflict of interest policy.

14. Special Conflict of Interest Procedures

This policy shall apply generally in all engagements of whatever nature at APHRC. In addition to this policy, APHRC may develop specific procedures to address unique situations of

conflict of interest in a particular project where necessary. The procedures shall define the scope and duration among other factors.

15. Related Policies and Procedures

15.1 The following policies and procedures are related to the implementation of this Policy.

- i. Code of Conduct and Ethics for the Board of Directors and staff (to be developed)
- ii. Anti-Fraud and Anti-Bribery Policy
- iii. Whistleblowing Policy
- iv. Procurement Manual
- v. HR Policies and Procedures Manual
- vi. APHRC Procedures for Managing Conflicts of Interest in Fund Management
- vii. APHRC Procedures for Managing Conflicts of Interest During Management of Research Matching Platform

15.2 Upon approval of this Policy, the APHRC Board Conflict of Interest Policy (2022) will be retired.

16. Review of Policy

This policy will be reviewed periodically (at least every three years) to ensure its continued effectiveness and compliance with best practices and relevant regulations.

Schedule 1: Terms of Reference for the Conflict of Interest Officer

Qualifications

- a) Solid experience and expertise in ethics, compliance and risk management principles;
- b) Strong commitment to ethical conduct and integrity;
- c) Strong analytical skills to assess the nature and severity of conflicts of interest and to evaluate potential risks and consequences;
- d) Effective communication skills that shall enable adequate collaboration with the Conflict of Interest Resolution Committee and APHRC representatives; and
- e) Knowledge of relevant laws, regulations and best practices relating to conflict of interest assessment and management.

Only persons who have been with the Center for at least one year shall be eligible for appointment to the position of Conflict of Interest Officer.

Tenure

The Officer shall serve for a period of two years, renewable once

Roles and responsibilities

- a) Guide APHRC representatives on conflict of interest issues arising from or identified in the course of ongoing activities as may be necessary to enable the persons involved in the said activity to make the appropriate decision;
- b) Receive and acknowledge conflict of interest declarations made in the prescribed form from the persons to whom this policy applies;
- c) Assess the level of risk posed by each declaration and assign it a rating of low, medium or high;
- d) Prepare a statement for each of the conflict of interest declarations, which shall contain the level of risk assessed, reasons for assessing that particular risk level, and a recommendation of how to manage the conflict;
- e) Forward the statements prepared to the Conflict of Interest Resolution Committee for evaluation and resolution as the need arises;
- f) Prepare quarterly reports about conflict of interest issues encountered to the Resolution Committee.

If, in the opinion of the Officer, a particular conflict of interest issue requires the urgent attention of the Resolution Committee, the Officer shall prepare and forward a statement to the Committee immediately, together with a recommendation for the Committee to meet at such a time as would enable the timely resolution of the issue.

Where the Officer himself/herself faces a conflict of interest situation, s/he shall immediately report it to the Resolution Committee and recuse him/herself from any meetings of the Committee in which his/her own conflict of interest situation will be discussed.

Schedule 2: Terms of Reference for the Conflict of Interest Resolution Committee

Composition

The Conflict of Interest Resolution Committee shall consist of twelve members as follows:

- a) One of the two Directors of Programs, who will chair the committee;
- b) The Director of Operations or his/her designate;
- c) One member from the Research and Related Capacity Strengthening Program;
- d) One member from the Policy Engagement & Communications Program;
- e) Two members from the Research programs;
- f) Two members from the West Africa Regional Office;
- g) One member from the Finance unit;
- h) One member from the Legal and Compliance unit;
- i) One member from the Human Resources unit; and
- j) One other person from among staff of the Center with expertise in ethics, research or governance.

The Conflict of Interest Officer shall be an *ex-officio* non-voting member and the Secretary of the committee.

Where the Conflict of Interest Officer is conflicted, the Chair of the Resolution Committee shall appoint one member to assess the situation and make a recommendation to the rest of the committee.

The Executive Director shall, in appointing members of the Resolution Committee, consider the same qualities as those required in a Conflict of Interest Officer.

Tenure

Members of the Conflict of Interest Resolution Committee other than the Conflict of Interest Officer, the Director of Programs and the Director of Operations shall serve for a non-renewable term of up to three years.

Quorum

The quorum for meetings of the committee shall be a simple majority, excluding the Conflict of Interest Officer.

The quorum for decision making shall be a simple majority of those present at the meeting

Roles and responsibilities

The committee will have the authority to investigate potential conflicts of interest, recommend mitigation measures and make decisions regarding recusal. In particular, the Committee will;

- a) Receive and acknowledge conflict of interest statements from the Conflict of Interest Officer;
- b) Convene meetings at least once every month to discuss the statements prepared by the Conflict of Interest Officer;
- c) Implement regular checks to ensure that procedures are adhered to and, where necessary, convene meetings to discuss complex issues as and when they may arise;

- d) Reassess the risk rating for specific conflict situations if it is deemed necessary and assign a new risk rating, which rating shall be final;
- e) Make decisions and issue final directions on the management of conflict of interest to persons facing low- and medium-risk conflicts;
- f) Forward all high-risk conflict of interest situations to the Executive Director together with a recommendation on how they shall be managed; and
- g) Prepare annual reports of meetings and resolutions to be forwarded to the Board Audit Committee for their information.

APPENDICES

APPENDIX A: APHRC CONFLICT OF INTEREST DECLARATION STATEMENT

(TO BE COMPLETED BY INTERVIEW CANDIDATES)

| | |
|-----------------|------------------------------|
| NAME: | POSITION APPLIED FOR: |
| PHONE: | EMAIL: |
| ADDRESS: | |

Are you or is your family member or someone with whom you have a strong personal or professional relationship involved in the activities of APHRC as an employee, consultant, adviser, Board member or in any other way?

Yes _____ No _____

If yes, please provide brief details.

Declaration: I declare that the information provided in this statement is true and complete.

Signature:

Date:

Name:

APPENDIX B: APHRC CONFLICT OF INTEREST DECLARATION STATEMENT
(TO BE COMPLETED BY BOARD MEMBERS AND STAFF AT ENTRY)

| | |
|-----------------|------------------|
| NAME: | POSITION: |
| PHONE: | EMAIL: |
| ADDRESS: | |

During the last five years, have you personally been involved in the activities of APHRC as an employee, consultant, adviser, Board member or in any other way?

Yes _____ No _____

If yes, please provide brief details

During the last five years, has your family member or someone with whom you have a strong personal or professional relationship been involved in the activities of APHRC as an employee, consultant, adviser, Board member or in any other way?

Yes _____ No _____

If yes, please provide brief details.

FINANCIAL CONFLICTS OF INTEREST

Have you or your family member been a recipient of APHRC funding before?

Yes _____ No _____

If yes, please provide brief details.

Do you or a family member have a financial or ownership interest in an entity doing business with or likely to do business with APHRC?

| | Yes | No |
|-------------|-----|----|
| Yourself | | |
| Your family | | |

If "Yes," please list such an entity or entities in the table below, the type of interest (e.g., stock, consulting fees, salary, royalties, patents), the estimated value or amount and the date or year. Attach an additional page(s) if necessary.

| ENTITY NAME | TYPE OF INTEREST | VALUE/AMOUNT (\$) | DATE/YEAR INTEREST WAS CREATED |
|-------------|------------------|-------------------|---|
| | | | |
| | | | |
| | | | |
| | | | |

BOARD MEMBERSHIPS OR RESPONSIBILITIES

a. Are you an Officer, trustee, Director or member of the Board of Directors of any other corporation, non-profit organization, foundation or agency?

Yes _____ No _____

If yes, please list below the organization(s), your title and your term of office, and answer subsection (c) below.

| ORGANIZATION | TITLE | TERM |
|--------------|-------|------|
| | | |

| | | |
|--|--|--|
| | | |
|--|--|--|

b. Is there any potential conflict of interest with respect to APHRC's work and mission related to any of these responsibilities?

Yes _____ No _____

If yes, please provide brief details.

ANOTHER POTENTIAL CONFLICT OF INTEREST

Is there anything not covered in the questions above that you believe might constitute a conflict of interest or that might create the appearance of a conflict of interest? (Possible examples: you are engaged in outside activities that overlap with the work of APHRC; you have a family member who is an employee, Officer, Director or consultant in an organization with which APHRC partners or collaborates)

Yes _____ No _____

If yes, please complete the following:

| INDIVIDUAL | NATURE OF POTENTIAL CONFLICT |
|-------------------|-------------------------------------|
| Self | |
| Family member | |
| Friend | |
| Self | |
| Family member | |
| Friend | |

| | |
|---------------|--|
| Self | |
| Family member | |
| Friend | |

I hereby certify that, to the best of my knowledge and belief, all the information provided herein is true, accurate and complete and has been provided in good faith. I understand that it is my responsibility to update this information in the event of any relevant changes. I have received a copy of APHRC's Conflict of Interest Policy, which I have read and stood, and I agree to comply with it.

Signature:

Date:

Name:

APPENDIX C: APHRC CONFLICT OF INTEREST DECLARATION STATEMENT

(TO BE COMPLETED BY MEMBERS OF THE BOARD AND STAFF ANNUALLY AND UPON OCCURRENCE OF AN ACTUAL OR POTENTIAL CONFLICT OF INTEREST)

| | |
|----------|-----------|
| NAME: | POSITION: |
| PHONE: | EMAIL: |
| ADDRESS: | |

FINANCIAL CONFLICTS OF INTEREST

Do you or a Family Member have a Financial or Ownership Interest in an Entity doing business with or likely to do business with APHRC?

| | Yes | No |
|-------------|-----|----|
| Yourself | | |
| Your family | | |

If "Yes," please list such an entity or entities in the table below, the type of interest (e.g. stock, consulting fees, salary, royalties, patents) and the estimated value or amount. Attach an additional page(s) if necessary.

| ENTITY NAME | TYPE OF INTEREST | VALUE/AMOUNT (\$) | DATE/YEAR THE INTEREST WAS CREATED |
|-------------|------------------|-------------------|------------------------------------|
| | | | |

BOARD MEMBERSHIPS OR LIKE RESPONSIBILITIES

a. Are you an officer, trustee, Director, or member of the Board of Directors of any other corporation, non-profit organization, foundation or agency?

Yes _____ No _____

If "Yes," please list below the organization(s), your title, and your term of office and answer subsection (c) below.

| ORGANIZATION | TITLE | TERM |
|--------------|-------|------|
| | | |

b. Is there any potential conflict of interest with respect to APHRC's work and mission related to any of these responsibilities?

Yes _____ No _____

If "Yes," please describe:

INTELLECTUAL PROPERTY

Do you have any ownership in or rights held with respect to Intellectual Property that could be in conflict with your obligations to APHRC (for example, ownership or rights in patents or patent applications held by another entity in the same or similar area of research as that conducted by APHRC)?

Yes _____ No _____

If "Yes," please describe:

PUBLIC STATEMENTS AND POSITIONS

As part of a regulatory, legislative or judicial process, are you providing any expert opinion or related testimony to the subject of the APHRC's work, for a commercial entity or other organization?

Yes _____ No _____

If "Yes," please describe

OTHER POTENTIAL CONFLICT OF INTEREST

Is there anything not covered in the questions above that you believe might constitute a conflict of interest or that might create the appearance of a conflict of interest? (Possible examples: you are engaged in outside activities that overlap with the work of APHRC; you have a family member who is an employee, officer, Director or consultant in an organization with which APHRC partners or collaborates)

Yes _____ No _____

If "Yes," please complete the following:

| INDIVIDUAL | NATURE OF CONFLICT |
|-------------------|---------------------------|
| Self | |
| Family Member | |
| Friend | |

| | |
|---------------|--|
| Self | |
| Family Member | |
| Friend | |
| Self | |
| Family Member | |
| Friend | |

I hereby certify that, to the best of my knowledge and belief, all of the information provided herein is true, accurate and complete and has been provided in good faith. I understand that it is my responsibility to update this information in the event of any relevant changes. I have received a copy of APHRC'S Conflict of Interest Policy, which I have read and stood and I agree to comply with it.

Signature: _____ Date: _____

Name: _____

APPENDIX D: APHRC PARTNERS'/ CONSULTANTS'/ SUPPLIERS' DECLARATION OF INTEREST STATEMENT

(TO BE COMPLETED ON ENTRY, AT RENEWAL OF CONTRACT/AGREEMENT OR UPON OCCURENCE OF AN ACTUAL OR POTENTIAL CONFLICT OF INTEREST)

During the last five years, have you personally been involved in the activities of APHRC, receiving funds for a program as a consultant, adviser, supplier or financial contributor to APHRC?

Yes _____ No _____

If yes, please provide brief details.

During the last five years, has a family member or someone with whom you have a strong personal or professional relationship been involved in the activities of APHRC, receiving funds from a program as an employee, consultant, adviser, supplier or contributor?

Yes _____ No _____

If yes, please provide brief details.

Please give details of any other activity, engagement or relationship with the APHRC during the last five years:

Due to the nature of work at APHRC, it is incumbent on the individual to consider and volunteer any real, potential or perceived conflicts of interest. Please use this space to declare any other information needed for APHRC to assess and manage real, potential or perceived conflicts of interest that have not been covered in the preceding questions:

Declaration: I declare that the information provided in this statement is true and complete.

Signature:

Date:

Name: