



# Legal Affairs

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## Conflict of Interest Policy

**MBZUAI-LAS-CONFINTR-POL-V1.0**

**Effective: 11/11/2021**

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## 1. Document Control Information

<b>Policy Name</b>	Conflict of Interest
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<i>For Office Use – Keywords for search function</i>	

## Policy Review

Person responsible	Workflow	Date
General Counsel	Initiate, Review	First approved version 01 Oct 2020, minor change 16 Nov 2023
Head of IEQA	Review	17 Nov 2023
President	Approve	11 Nov 2021

## 2. Glossary of Terms

Term	Definition
Conflict of Interest	<p>A situation in which any personnel has a private or personal interest that is likely to appear to influence the objective exercise of an aspect(s) of their University duties.</p> <p>For the purpose of this Policy, the term ‘conflict of interest’ includes perceived, potential and actual conflicts of interest.</p> <ul style="list-style-type: none"> <li>• A perceived conflict of interest is one which a reasonable person would consider likely to compromise objectivity;</li> <li>• A potential conflict of interest is a situation which could develop into an actual or perceived conflict of interest;</li> <li>• Financial interest refers to anything of non-trivial monetary value;</li> <li>• Non-financial interest refers to any non-financial benefit or advantage, including, but not limited to, enhancement of an individual’s career, education or professional reputation, access to privileged information or facilities.</li> <li>• Relative or friend: Any member of a personnel’s close family or friend, likely to appear to a reasonable person to influence their objectivity.</li> </ul>

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### 3. Introduction

The University recognizes that its personnel and students have diverse interests and contacts within the local, national and international community. These links are often in the public interest, as well as beneficial to the University and to individuals. It is also possible that such connections may give rise to potential conflicts of interest.

The University recognizes that, in general, individuals will recognize conflicts of interest and will want to ensure that there can be no perception of their receiving an inappropriate advantage, and that they are personally beyond suspicion.

In most cases, potential conflicts of interest will be easily avoided or resolved by informal action, either by the individual concerned or through discussion with their manager.

### 4. Objective

The purpose of this Policy is to:

- Assist in identifying conflicts of interest;
- Establish a system for disclosure of conflicts of interest;
- Provide guidance to those responsible for dealing with conflicts of interest;
- Assist in the resolution of conflicts of interest in order to protect the University and its personnel.

### 5. Scope

This policy applies to all employees and students (referred to collectively as “personnel”) of the University and relates to any actual, perceived or potential conflicts of interest arising in connection with University activities.

### 6. Conflict of Interest Policy

#### 6.1. Principles

6.1.1. There is a need to balance the rights and responsibilities of personnel and those of the University in relation to the management of conflict of interest. Each personnel has an obligation to act in the best interests of the University in relation to their University duties, activities and employment. The University has obligations to its personnel:

- not to interfere in their private concerns where these have no bearing on the legitimate interests of the University; and
- to deal with issues raised under this Policy in a prompt, fair, reasonable and objective manner, paying due attention to the effects of any actions on an personnel’s work, career and reputation.

6.1.2. The existence of an actual, perceived or potential conflict of interest does not necessarily imply wrongdoing on anyone’s part. However, any private, personal, or commercial interests which give rise to such a conflict of interest must be recognized, disclosed appropriately, and either eliminated or properly managed.

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## 6.2. Determining a Conflict of Interest

6.2.1. In order to determine whether a conflict of interest exists, it should be determined whether the private, personal or commercial interest is likely to interfere, or appear to interfere with the objective judgement the personnel should show in performing their University duties. Could others reasonably conclude that it might influence the personnel to act other than in the interests of the University? Serious conflicts of interest include, but are not limited to, the following points: Personnel using their University position to:

- Influence a contract or other favorable terms for a company in which they, or a relative or friend, had a financial interest;
- Influence employment, promotion, admission to a course of study, educational progression or other financial or non-financial benefit for a relative or friend; or
- Obtain financial or non-financial benefits for him/herself or for a relative or friend in return for providing advantage, or potential advantage;
- Compromising research objectivity or independence in return for financial or non-financial benefit for them or for a relative or friend;
- Using University resources or confidential information obtained through their University position for personal financial or non-financial benefit, or benefit to a relative or friend;
- Conducting business, employment or activity outside the University, which adversely affects the personnel’s ability to perform their duties

## 6.3. Disclosure of a Conflict of Interest

6.3.1. The responsibility for identifying and avoiding conflict of interest, in the first instance, lies with the individual personnel. If a conflict of interest situation arises, the personnel must disclose the conflict of interest in writing, and seek a resolution. They must then take no part in the matter(s) relating to that interest unless, and until such time as the potential conflict is resolved. All personnel are required to submit a conflict of interest disclosure form every year, whether they have a conflict of interest to disclose, or not.

## 6.4. Failure to Disclose a Conflict of Interest

6.4.1. Failure to disclose an actual or perceived conflict of interest, or to cease involvement in the situation until the conflict has been resolved, constitutes a breach of the personnel’s contract of employment and may result in disciplinary action, and in serious cases could result in dismissal.

## 6.5. Resolutions of Conflicts of Interest

6.5.1. Once a conflict has been disclosed, the line manager, or supervising faculty, is responsible for resolving the conflict of interest as soon as is reasonably practicable, including the escalation of the matter, if required. Until that time, the personnel must take no part in the particular activity relating to the potential conflict. Every effort should be made to reach agreement with the personnel regarding the solution. Resolution of the conflict may not go beyond the scope of the personnel’s contractual obligations (explicit or implicit) without the personnel’s agreement.

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## 7. Related Documents

Section	Related Document(s)
6.3	Link to the conflict of interest disclosure <a href="#">form</a>

## 8. Version History

Version number	Person responsible	Date of change	Comments
V1.0	General Counsel	11/11/2021	First approved version
V1.1	General Counsel	16/11/2023	Minor addition to section 6.3 disclosure of a conflict of interest on submitting the form and attaching the related form.
V1.2	Head of IEQA	17/02/2025	Corrected policy as the version published was missing sections 6.1-6.3 which had been approved in the original approval process V1.0.

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