

## **CONFLICT OF INTEREST RULES**

Adopted by the Board of the Foundation for Baltic and East European Studies on 27 September 2018

Conflict of interest Conflict of interest relates to doubt about impartiality. The purpose of rules on Conflict of interest is to ensure objectivity and impartiality in the handling of matters. Another purpose of these rules is to generate confidence among those affected by the matters concerned and among the public. Regarding the Foundation's asset management, a special policy exists.

### *Legislation*

The Foundation for Baltic and East European Studies is not covered by the Swedish Administrative Procedure Act (SFS 1986:223), which contains provisions on Conflict of interest in central government agencies. However, the Foundation's activities show marked public features and accordingly, the Foundation applies the provisions on its own initiative in a manner similar to that of state research funders.

### *Who is covered*

The Foundation's Conflict of interest rules apply to members of the Board, the research delegation and the investment committee; employees; and external experts and consultants engaged by the Foundation.

### *Definition*

A member has a Conflict of interest if the matter concerns, or its outcome may be expected to entail particular benefit or harm to, the member or anyone closely related to or connected with the same, or if otherwise there is any special circumstance that may cause the member's impartiality in the matter to be called into question.

The following examples of such circumstances may be mentioned:

- close collaboration in a professional sense (in collaboration or joint publication, divergent publication traditions in different academic fields, as well as when collaboration or joint publication took place, should be taken into consideration)
- financial dependence
- a manager-subordinate relationship
- evident friendship or enmity.

The Foundation's Board may decide on exceptions to the above rules if there are particular reasons. Primarily counted as such a reason is the need for exclusive expertise of great importance for the handling of the matter. A person with a Conflict of interest may then be allowed to participate in dealing with the matter, but not in a decision. This must (in the same way as reporting of Conflict of interest) be entered in the record of meetings at which the matter is handled.

### *Reporting of Conflict of interest*

Those who are aware of any circumstance that may be assumed to constitute Conflict of interest regarding themselves must voluntarily disclose it. Anyone who is aware of a circumstance that may be assumed to constitute a Conflict of interest for a person involved in the handling of the matter must disclose it if the person concerned has not drawn attention to the circumstance. This open spirit safeguards objectivity and impartiality in handling of matters, and also outsiders' confidence that this is being done.

### *Handling of Conflict of interest*

Investigation of whether Conflict of interest exists must always be included on the agenda for the Board and also for the agendas of the delegations and committees that work on the Board's behalf. Whether Conflict of interest exists is settled by the Board or delegations and committees respectively on a case-to-case basis.

A person with a Conflict of interest may not handle the matter, that is, take any preparatory action or participate in settling the matter. The person with a Conflict of interest must leave the room when the matter is discussed. However, a member who has reported Conflict of interest may be asked about factual circumstances relating to the application or other matter in question if the Chair finds that this is required to obtain sufficient information on the matter. If the Chair has a Conflict of interest, a special Chair of the meeting for the matter concerned may be appointed.

Conflict of interest must be noted in minutes of meetings. In addition, where a possible Conflict of interest has been investigated but not considered to exist, this must be entered in the minutes.

A member of the Foundation's Board or research delegation must, in a review of and decision on an application, voluntarily report Conflict of interest, if any. Conflict of interest exists if the review or decision relates to an agreement between the Foundation and the member personally or if, in an agreement between the Foundation and a third party, the member has a vital interest that may conflict with that of the Foundation.

Here follow some examples on when Conflict of interest must be reported:

- An application from a person close to the member through kinship or other personal relations.
- An application from a close colleague, supervisor, doctoral student or other member of the research group or immediate institutional environment to which the member of the Foundation's Board or research delegation belongs.
- An application that competes with or supports the member's own interests, such as in the event of enmity or co-publication.

Questions concerning Conflict of interest are addressed to external experts in inquiries about expert and evaluation assignments for the Foundation.

In addition, members of the Foundation's Board, research delegation and investment committee, and also its employees, may not apply to the Foundation for funding for their duration of their membership of the Board or delegations/committees or of their employment by the Foundation.