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Addis Ababa University  
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## POLICY ON FINANCIAL CONFLICT OF INTEREST

Addis Ababa University  
Office of the Director of Research

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## 1. INTRODUCTION

Addis Ababa University (AAU) is a research university and a member of research universities alliance such as the African Research Universities Alliance. The University provides research funds to its staff through various schemes including Thematic Research, Adaptive Research and other initiatives such as Seed Grant to engage each staff in research, to attract international funds/ grants, and to encourage them to publish their findings in reputable journals. The fund also enables them to provide evidence-based information to the public and decision makers.

As a result, the university runs several research projects and makes a lot of financial transactions from local and international sources. For instance, the College of Health Sciences alone solicited the highest external fund among AAU colleges with greater than 600 million ETB between 2008 and 2010 E.C.

The University has created standard mechanisms to strengthen the research integrity and accountability of its faculty and staff members. Accordingly, the University has prepared several policies, guidelines and regulations to implement research projects as originally proposed and approved by the institutes. AAU complies with the Rules and Regulations of the Ministry of Finance of the Ethiopian Government and also with the approved project proposal.

This Financial Conflict of Interest Policy establishes guidelines for the disclosure, identification, and management of financial conflict of interests (FCOI) for Investigators responsible for the design, conduct, or reporting of research under an externally sponsored research project or when proposing for project with an externally sponsored grant.

## **2. PURPOSE**

The purpose of this procedure is to document the requirements and responsibilities associated with identifying and managing financial conflicts of interest to safeguard the integrity of the University with respect to the conduct of research.

The purpose of the regulation promotes objectivity in research by establishing standards that provide a reasonable expectation that the design, conduct and reporting of research will be free from bias resulting from Investigator's financial conflict of interest.

This document should be read in conjunction with the University Policy on Anti-plagiarism.

## **3. SCOPE AND APPLICABILITY**

This Policy is applicable to all Investigators (as defined below) involved in Research for or on behalf of AAU, and includes all full and part-time employees and graduate students, visiting scientists, and researchers. This Policy also extends to any subcontractors, sub-grantees or sub-awardees (collectively "Subrecipients") at other institutions conducting Research for or on behalf of AAU.

## 4. DEFINITIONS

The following definitions are the key definitions in understanding this policy.

- 4.1 Institution** – means any domestic or foreign, public or private, entity or organization (excluding a Federal agency) applying for, or receiving funding from research grant sources such as NIH or any other grant providing institutions with which Addis Ababa University has long experience working with<sup>1</sup>.
- 4.2 Investigator** – means the project director (PD) or principal investigator (PI) and any other person, regardless of title or position, who is or will be responsible for the design, conduct, or reporting of research funded by the grant source, which may include, for example, collaborators or consultants.
- 4.3 Senior/Key Personnel** – means the PD/PI and any other person identified as senior/key personnel by the Institution in the grant application, progress report, or any other report submitted to the funding organization to the research, such as NIH or any other grant providing entity by the Institution under the regulation.
- 4.4 Institutional responsibilities** – means an Investigator's or PD's professional responsibilities on behalf of the Institution, and as defined by the Institution, including but not limited to, activities such as research, research consultation, teaching, professional practice, institutional committee memberships, and service on panels such as Institutional Review Boards or Data and Safety Monitoring Boards.
- 4.5 Financial interest** – means anything of monetary value received or held by an Investigator or any member of the Investigator's immediate family

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<sup>1</sup> In addition to the US National Institutes of Health (NIH), Addis Ababa University works with other grant providing institutions that include: USAID, Swedish Sida/SAREC, Norwegian NUFU, Canadian CIDA, and others.

(specifically, any dependent children, spouse or common law partner), whether or not the value is readily ascertainable. Financial Interests include salary or other payments for services (e.g. consulting fees, honoraria, or paid authorships for other than scholarly works), equity interests (e.g. stocks, stock options, or other ownership interests), and intellectual property rights and interests (e.g. patents, trademarks, service marks, and copyrights) upon receipt of royalties or other income related to such intellectual property rights and interests.

**4.6 Financial conflict of interest (FCOI)** – means a financial interest that could directly and significantly affect the design, conduct, or reporting of the funded research.

**4.7 Significant Financial Interest (SFI)** – means a financial interest consisting of one or more of the following interests of the Investigator (and those of the Investigator’s spouse and dependent children) that reasonably appears to be related to the Investigator’s University responsibilities:

4.7.1 With regard to any publicly traded entity, a significant financial interest exists if the value of any remuneration received from the entity in 12 months preceding the disclosure and the value of any equity interest in the entity as of the date of disclosure, when aggregated, exceeds \$5,000;

4.7.2 With regard to any non-publicly traded entity, a significant financial interest exists if the value of any remuneration received from the entity in 12 months preceding the disclosure, when aggregated, exceeds \$5,000, or when the Investigator (or the Investigator’s spouse or dependent children) holds any equity interest (e.g. stock, stock option, or other ownership interest);

4.7.3 Upon receipt of income related to intellectual property rights and interests (e.g. patents, copyrights);

4.7.4 The Investigators must also disclose the occurrence of any reimbursed or sponsored travel (that which is paid on behalf of the

Investigator and not reimbursed to the Investigator so that the exact monetary value may not be readily available), related to the university responsibilities, provided, however, that this disclosure requirement does not apply to travel that is reimbursed or sponsored by excluded sources provided in regulation. For example, if the PI travels to a scientific seminar but does not pay or receive reimbursement by the Company directly (i.e. the travel was paid for by a third party/sponsor), the PI is required to disclose basic information to the Company relating to the trip, such as purpose of the trip, identity of the payer/sponsor, destination and duration. The Company is required to determine if additional information is required (e.g. monetary value) and whether the travel constitutes a FCI with the funded research, such as NIH-funded research;

4.7.5 The term significant financial interest does not include the following types of financial interests:

- salary, royalties, or other remuneration paid by an Investigator's Institution to the Investigator if the Investigator is currently employed or otherwise appointed by the Institution, including intellectual property rights assigned to the Institution and agreements to share in royalties related to such rights;
- income from seminars, lectures, or teaching engagements sponsored by a federal, state, or local government agency, an Institution of higher education, an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education; or
- income from service on advisory committees or review panels for a federal, state, or local government agency, an Institution of higher education, an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education.

**4.8 Management of FCOI** – means taking action to address a financial conflict of interest, which can include reducing or eliminating the financial conflict of interest, to ensure, to the extent possible, that the design, conduct, and reporting of research will be free from bias.

## **5. FINANCIAL DISCLOSURE**

Investigators directly or through their Principal Investigator (PI) of the research team are required to disclose Significant Financial Conflict of Interest (SFI) to the the Associate Dean for Research and Technology Transfer Office of their College/School/Institute whenever they apply the first time for funding from grant sources, or government and non-governmental contracts. The College/School/Institute RTT will verify the disclosure report and send it with a consolidated report to the university-wide FCOI Committee through the Director of Research of the University). In addition, Investigators must disclose SFI annually during the life of a sponsored research project, and within 30 days of discovering or acquiring a new SFI using the form attached in the FCOI Implementation Guideline, **Annex 1**.

There are two forms that are required in the Financial Conflict of Interest Policy: **Form-1:** Statement of Financial Interest; and **Form-2:** Conflict of Interest Disclosure Form.

## **6. FINANCIAL CONFLICTS OF INTEREST REPORTING PROCEDURE**

Th Director of Research Office through the VPRTT will submit a report to the funding organizations, requiring FCOI disclosure, about the Investigator's SFI annually or upon request.

The FCOI Implementation Guideline comprises the details in implementing this FCOI Policy.



## 7. APPROVAL AND REVIEW DETAILS (VERSION CONTROL)

Approval and review	Details
Name of document as intended to be cited where needed	Addis Ababa University <b>FINANCIAL CONFLICT OF INTEREST</b> , 2020/2021
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