

AMERICAN UNIVERSITY OF BEIRUT

POLICY ON DUALITY OF INTEREST OR CONFLICT OF INTEREST

**Adopted by the Board of Trustees at its Meeting
on November 19, 1993**
(Revised on March 19, 2004)

The Board of Trustees of the American University of Beirut wishes to establish a policy setting forth rules to govern possible duality of interest and conflict of interest involving its faculty, officers, administrators, medical staff, and employees. The Board therefore adopts the following resolution:

WHEREAS,

- (A) The American University of Beirut depends on its faculty, officers, administrators, medical staff, and employees to give their time and efforts to the benefit of the University, including its Hospital;
- (B) Service as a faculty member, officer, member of the administrative or medical staff, or employee carries with it a requirement of loyalty to the University and a responsibility to conduct the University's affairs honestly and economically, exercising each individual's best care, skill, integrity and judgement for the benefit of the University;
- (C) Because of the varied interests and backgrounds of its faculty, officers, administrators, medical staff, and employees, situations may develop which involve a duality of interest or conflict of interest between an individual and the University, and yet it is important that such potential duality or conflict of interest shall not render service to the University impossible;

NOW, THEREFORE, BE IT RESOLVED, that the following policy on duality of interest and conflict of interest is hereby adopted for the guidance of faculty, officers, administrators, medical staff, and employees.

POLICY ON DUALITY OF INTEREST OR CONFLICT OF INTEREST

November 19, 1993

A. General Policy

All decisions and actions by faculty members, officers, administrators, medical staff, and employees shall be made in a manner which promotes the best interests of the American University of Beirut and avoids the prospect of a conflict of interest. This policy shall be maintained by the following practices of disclosure of affiliation and withdrawal from debate, voting, or other decision-making processes where duality or conflict of interest may exist.

B. Disclosure

Upon assuming appointment as an officer, or as a member of the faculty, administration or medical staff, or employee, each individual shall submit to the President a list of his or her affiliations with any person, firm, organization, or corporation with which he or she has reason to believe the University does business; any business affiliations which the individual may have with any other officer or employee of the University; and such other information as may be necessary to comply with the policy. (For the purposes of this policy, parents, brothers and sisters, spouse, in-laws and children of the individual shall be regarded as though they were appointees). Each individual shall be expected to amend the list from time to time as his or her affiliations or duties change.

C. Participation and Voting

When a particular matter involves a person, firm, organization, or corporation with which a faculty member, officer, or member of the administrative or medical staff (or a relative as specified above) has an affiliation, such affiliation shall be brought to the attention of the individual's immediate supervisor and Dean, or Vice President or President, as applicable, in writing by the individual himself/herself and the individual shall refrain from all decision-making processes relating to the affiliated person, firm, organization or corporation. Should the matter arise at any meeting, such disclosure shall be made by the individual involved prior to any discussion or vote, and shall be noted in the minutes of the meeting. The individual shall refrain from participating at the meeting in the discussion and from voting on the matter.

D. Supplemental Procedures

The President may issue additional disclosure and participation procedures which implement this University policy.

E. Definitions and Procedures

1. For purposes of this policy, faculty members, officers, administrators, medical staff, and employees shall be considered affiliated with a person, firm, organization or corporation if:
 - (a) the individual is an officer, director, partner, trustee, employee, or agent, whether paid or unpaid, of such person, firm, organization or corporation; or
 - (b) the individual is the actual or beneficial owner of more than 1 percent of the voting stock or controlling interest of such firm, organization or corporation; or
 - (c) the individual has dealings with such person, firm, organization or corporation from which he or she has knowingly materially benefited; or
 - (d) the individual's immediate family (parents, brothers, sisters, spouse, in-laws or children) have any of the positions, ownership or benefits set forth in the preceding (a) through (c).

For purposes of this policy, affiliation with persons, firms, organizations, or corporations which may present a conflict of interest under provisions A through D of this policy must be disclosed to the University.

2. For purposes of this policy, all consulting agreements or arrangements, formal or informal, paid or unpaid, to which a faculty member, officer, administrator, medical staff member, or employee is a party are subject to disclosure under provisions A through D of this policy.
3. The Director of Human Resources shall maintain a file of information disclosed pursuant to this policy.
4. A copy of this policy shall be distributed to all faculty members, officers, administrators, medical staff, and employees and shall be posted in the University's Human Resources Office and in the Medical Center.
5. Issues arising under the application of this policy shall be resolved by the President.

**FORM FOR DISCLOSURE OF ACTIVITIES WHICH MAY
INVOLVE CONFLICT OF INTEREST**

I, _____, have read and understood the "University Policy on Duality of Interest" of November 19, 1993, as revised on March 19, 2004, and in accordance with this policy I state the following:

1. I attach a list of all my affiliations with any person (including any officer or employee of the University), firm, organization, or corporation with which I have reason to believe the University does business.

-- NOT APPLICABLE

-- LIST ATTACHED

2. I attach a list of my consulting arrangements, whether or not I believe that they may involve potential conflict of interest.

-- NOT APPLICABLE

-- LIST ATTACHED

3. I shall amend these two lists promptly (items 1 and 2) whenever my affiliations or duties change.

4. If I become aware that any member of my family (parents, brothers and sisters, children, spouse, and/or in-laws) is engaged in business with the University, I shall disclose my relationship with the person(s) concerned and the nature of this business.

5. I understand that I am not to participate in any decision or vote on an issue in which I may have conflicts of interest because of affiliations listed in items 1, 2, and 4.

I submit this information to the President of the University.

Signature: _____

Position: _____

Date: _____