

Academia Sinica

Management Guidelines on Conflicts of Interest

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1. In order to uphold the objectivity of scientific research, the academic integrity, the fair use of research resources, the public sharing of research result, the duty of loyalty to the staff's position, and the protection of the rights of research subjects, The Academia Sinica (hereinafter referred to as "the AS") hereby promulgates these Guidelines.
2. For the purposes of these Guidelines, the following terms shall have the following meanings:
 - (a) Conflict of interest:
 - (1) Personal conflict of interest: A situation in which the professional judgment and conduct of an AS member based on their position is unduly influenced by personal interests, posing a risk to the interests that the AS, as an academic research institution, should uphold, as referred to in the first article of these guidelines.;
 - (2) Institutional conflict of interest: A situation in which the implementation, review, or supervision of a case under these Guidelines is unduly influenced by the financial interests of the AS or the personal interests of the administrative officer of the AS, posing a risk to the interests that the AS, as an academic research institution, should uphold, as referred to in the first article of these guidelines;
 - (3) Conflict of duty: A situation in which the duties that an AS member is obligated to perform based on her/his position conflict with the duties that he or she simultaneously undertakes under a commission from another agency (organization) or another contractual relationship, posing a risk to the interests that the AS, as an academic research institution, should uphold, as referred to in the first article of these guidelines.
 - (b) Financial interest:
 - (1) Movable and immovable property.
 - (2) Cash, deposits, foreign currency and securities.
 - (3) Creditor's rights or other property rights.
 - (4) Other benefits that have economic value or can be obtained through monetary transactions.

(c) Significant financial interest:

- (1) Any property interest that the declarant and his or her spouse (including same-sex permanent partnerships registered for marriage) or cohabiting partner, minor children (hereinafter referred to as "related persons") have obtained or expect to obtain from the disclosure subject within one year prior to the date of disclosure, the total value of which exceeds NT\$150,000.
- (2) At the time of disclosure, the declarant and his or her related persons have investments in or hold shares in the disclosure subject. However, this does not apply if the total value of the investments in or holdings of shares in listed (or OTC-listed) companies does not exceed NT\$150,000.
- (3) The declarant and his or her related persons are the owners of intellectual property rights in patents or copyright materials used by the Institute or related to the research or have obtained financial benefits from their use.
- (4) The declarant or his or her related persons serve as the responsible person, director, supervisor or manager of the disclosure subject. However, in cases under Articles 9 and 11 of these Guidelines, this also applies if the declarant's adult children, parents, grandparents, grandchildren or siblings hold the aforementioned positions.
- (5) For the benefit of the declarant or his or her related persons, any property interest, investment or holding of shares obtained by a trustee, nominal owner or agent shall be deemed to be a property interest, investment or holding of shares of the declarant or his or her related persons.
- (6) Donations to the AS for the personal use of AS Investigators and technicians of the AS, their hosted laboratories or their ongoing research projects, etc., shall be included in the declarant's financial interests.
- (7) Any agreement with the disclosure subject to obtain financial interests or assume the positions specified in Item 4 after the disclosure shall also be considered financial interests within the meaning of this paragraph.

(d) Financial interests of the AS:

- (1) The AS has received donations totaling NT\$3 million or more from a business enterprises or other non-governmental organizations(institutions) related to the research.
- (2) The AS has obtained shares, royalties, license fees or other financial interests from the transfer or licensing of technology related to the research.

(e) Cohabiting partner: A person who has an equivalent relationship to a spouse with the declarant for the purpose of living together.

3. The AS shall establish a Conflicts of Interest Management Committee (hereinafter referred to as

the "COIC") to handle matters related to conflict-of-interest management at the AS. The specific terms of establishment shall be separately prescribed.

Matters related to conflicts of interest in human subject research and human research shall be managed and reviewed by the Institutional Review Board on Biomedical Science Research (IRB-BM) and the Institutional Review Board on Humanities and Social Science Research (IRB-HS).

4. The Department of Legal Affairs of the AS shall handle the following administrative matters of the COIC:
 - (a) Receiving disclosures of financial interests.
 - (b) Assisting in the review of conflict of interest matters at the AS.
 - (c) Research and planning of the AS's conflict of interest management system.
 - (d) Drafting and consultation of the AS's conflict of interest management regulations.
 - (e) Conflict of interest education and training for the AS's personnel.
 - (f) Other administrative matters related to conflict-of-interest management at the AS.

In order to assist the COIC in reviewing conflict of interest cases, the Department of Legal Affairs of the AS may request each unit of the AS to provide information on the AS's financial interests and other relevant information.

5. In accordance with these Guidelines, the AS's Investigators, research technicians, and administrative directors/managers shall, in good faith, actively and fully disclose their financial interests to the COIC, which shall review whether such interests create a conflict of interest and decide on management and recusal measures.

The specific rules for the disclosure of financial interests, the review criteria and procedures, etc., shall be separately prescribed by the COIC.

6. Regarding donations categorized in Article 2, Subparagraph c, Item 6, of the Guidelines made to the AS, the receiving investigators and technicians of the AS shall disclose their significant financial interests affiliated with the donor and other interests that can reasonably be considered to impact the objectivity in scientific research. The AS shall not accept donations prior to the approval or recordation by the COIC.
7. The AS's Investigators and technicians of the AS must disclose any significant financial interests or other interests, related to business enterprises or other non-governmental organizations (institutions) sponsoring the research, that could reasonably be considered to have the effect of influencing the objectivity of scientific research, from the time that they intend to accept funding to conduct a research project. The research may not be conducted until the COIC has approved or recorded it.
8. The AS's investigators and technicians of the AS must disclose any significant financial interests or other interests, related to business enterprises or other non-governmental organizations (institutions) concerning the research, that could reasonably be considered to have the effect of

influencing the objectivity of scientific research, from the time that they intend to accept a subsidy or grant from a government organization (institution) to conduct a research project. The research may not be conducted until the COIC has approved or recorded it.

The provisions of the preceding paragraph shall apply *mutatis mutandis* to research projects funded by the AS's public budget and research funds.

9. Creators of research result must disclose any significant financial interests they have in the business enterprises or other non-governmental organizations (institutions) that intends to accept the transfer, assignment, or licensing of the technology or materials, from the time that they intend to apply for the transfer, assignment, or licensing of the technology or materials from the AS. The transfer, assignment, or licensing may not be made until the COIC has approved or recorded it. However, this does not apply to the transfer of materials to non-profit organizations for academic research purposes.

The aforementioned personnel may participate in the promotion and negotiation of research and development result. However, they should avoid participating in the review or approval of cases involving the management or application of their research and development result.

10. The AS's Investigators and technicians of the AS who intend to hold a part-time position in accordance with the Guidelines for Academia Sinica Research Fellows and Research Specialists Holding Concurrent Positions must disclose their interests in accordance with the provisions of those Guidelines. The part-time position may not be held until the COIC has approved or recorded it.
11. Investigators and technicians of the AS appointed as secondments pursuant to the Guidelines for Temporary Transfer of Research Staff of The AS to Profit-seeking Enterprises shall disclose their significant financial interests affiliated with the Entity. Secondments shall not be appointed prior to the approval or recordation by the COIC.
12. Pursuant to Articles 7 and 8 of these Guidelines, AS investigators and technicians who have conducted research projects after their financial interests have been approved or recorded or recorded by the COIC shall disclose their financial interests as specified in those articles annually during the period of their research projects.
13. The AS's administrative officers who are involved in research related duties must disclose to the COIC by the end of December each year their significant financial interests and other interests, acquired from business enterprises or non-governmental organizations (institutions) , that could reasonably be considered to have the effect of influencing the objectivity of scientific research in relation to The AS's research. However, the significant financial interests referred to in the first and second items of Subparagraph c of Article 2 shall be calculated on the basis of NT\$300,000. The administrative officers referred to in the preceding paragraph are to the President and Vice Presidents of the AS, Executive Secretary and Deputy Executive Secretaries of the Central Academic Advisory Committee, Secretary-General, Deputy Secretary-General, Director of

Academic Affairs and Instrument Service, Director of the Intellectual Property and Technology Transfer, Director of International Affairs, and Directors of the various research institutes and centers.

The AS administrative officers who are involved in research related duties and who take up office before the end of September each year must disclose the financial interests referred to in the first paragraph within three months of taking up office.

Administrative officers who are involved in research related duties must disclose the financial interests referred to in the first paragraph within two months of leaving office.

14 、 If there is a change in the financial interests of The AS investigators, research technicians, and administrative officers involved in research related duties, they must update their disclosure information with the COIC within 30 days of the change.

15 、 The AS's personnel who sign, review, or approve cases under Articles 6 to 13 should recuse themselves if they have a significant financial interest or other conflict of interest with the relevant business enterprises or non-governmental organizations (institutions).

For two years after the signing of the contract referred to in Article 9, the aforementioned personnel and their related persons may not invest in the said business enterprise. However, this does not apply to business enterprises that have been listed or traded on the stock exchange.

16 、 If the COIC becomes aware of any matters that should be disclosed, it may request The AS personnel to make a disclosure. If the COIC becomes aware of any cases where a person should have recused themselves but did not, it should request that they recuse themselves. Interested parties in individual cases may also apply to the COIC for their recusal.

17 、 In the course of its review procedures, the COIC may notify the parties concerned and the relevant personnel of the case to provide relevant information or to appear at a designated place to give their opinions.

18 、 When reviewing cases disclosed under these Guidelines, the COIC shall, if it finds that the person making the disclosure has a need to recuse themselves or should take other measures to avoid a conflict of interest, put forward specific recommendations for handling the case, which shall be submitted to The AS for approval and implementation.

19 、 Cases of violations of these Guidelines shall be referred to the Divisional Ethics Committee for review after preliminary investigation by the COIC.

If the COIC considers the results of the review in the preceding paragraph to be a serious case, it shall notify the funding agency or the Office of the President.

20 、 The provisions of these Guidelines shall apply mutatis mutandis to other persons engaged in scientific research work as designated by the COIC.

21 、 The COIC shall regularly publish on the website of the Department of Legal Affairs of the AS the types and number of conflict-of-interest cases.