

**Conflict-of-Interest policy Independent Panel on Evidence for Action against Antimicrobial Resistance**  
**Independent Panel on Evidence for Action against Antimicrobial Resistance**

**A. Purpose of the Conflict-of-Interest Policy**

1. The Independent Panel on Evidence for Action against Antimicrobial Resistance (the Panel) is established to facilitate the generation and use of multisectoral, scientific evidence to support efforts to tackle antimicrobial resistance (AMR) through a One Health approach.
2. The functions of the Panel require scientific independence, credibility, and legitimacy, applying impartial and scientific judgement to maintain public confidence in its processes and outputs. It is essential that the work of the Panel is not compromised by any conflict of interest. The overall purpose of this Conflict-of-Interest (COI) Policy is to protect the legitimacy, integrity, trust, and credibility of the Panel and its deliverables as well as confidence in its activities and in individuals who are directly involved in the preparation of its reports and other deliverables.
3. The Panel recognizes the commitment and dedication of those who participate in its activities and the need to maintain a balance between minimising the reporting burden and ensuring the integrity of the Panel and its deliverables. In this way, the Panel will seek to implement this policy while encouraging participation, promoting the representativeness and geographical and gender balance of the Panel, and continuing to build and maintain public trust. This policy provides an overarching framework. However, it does not offer an exhaustive list of criteria for identifying conflicts of interest, allowing flexibility in implementation as understanding and context evolve over time.
4. This (COI) policy is designed to ensure that conflicts of interest are identified, prevented, disclosed and managed to avoid any adverse impact on the Panel's independence, deliverables and processes, thereby protecting the person or persons concerned, the Panel, and the public interest.
5. It is essential to avoid a situation in which the work of the Panel could be questioned, discounted or dismissed owing to the perception of a conflict of interest. It is recognized that the privacy and professional reputation of individuals must be respected. Disclosing a potential conflict of interest does not automatically mean that a conflict of interest exists.

**B. Scope of the COI Policy**

6. This COI Policy applies to all parts of the Panel, including members of the Expert Committee and any *ad hoc* expert thematic working groups contributing to the development of outputs, a and partners supporting the Panel's work. United Nations rules and regulations apply to United Nations personnel with respect to conflict of interest.
7. The policy applies to the development of all Panel outputs.
8. The staff members of the Panel's Secretariat as employees of any of the Quadripartite organizations are subject to their respective organization's disclosure and ethics policies, as well as code of conduct, which include conflict of interest.

**C. Definition of Conflicts of Interest**

9. For the purposes of this policy, a "conflict of interest" refers to any current or recent professional, financial, or other non-financial interest, including interests held previously where relevant to the individual's role or the Panel's work, which could:

- (a) significantly impair the individual's objectivity in carrying out their duties and responsibilities for the Panel, or
- (b) create an unfair advantage for any person or organization.

Circumstances that could lead a reasonable person to question an individual's objectivity, or whether an unfair advantage has been created, constitute a potential conflict of interest. These potential conflicts are subject to disclosure.

10. "Conflict of interest" should be distinguished from "bias," which refers to a point of view or perspective that is strongly held regarding a particular issue or set of issues, but does not necessarily involve personal gain. In the case of author and review teams, bias can and should be managed through the selection of a balance of perspectives. Bias can also be managed through other means, including a rigorous peer review. For example, it is expected that Panel author teams will include individuals with different perspectives and affiliations. Those involved in selecting authors will need to strive for an author team composition that reflects a balance of expertise and perspectives, such that Panel deliverables are comprehensive, objective, and policy relevant without being policy prescriptive. In selecting these individuals, care must be taken to ensure that biases can be balanced where they exist. In contrast, conflict of interest exists where an individual, or an organization, could secure a profession, financial or other non-financial gain through outcomes of a Panel process or output and deliverable.
11. The conflict-of-interest requirements in this policy are not designed to include an assessment of one's behaviour or character or one's ability to act objectively despite the conflict of interest.
12. This policy does not apply to past interests that have expired, no longer exist, and cannot reasonably affect current behaviour. Nor does it apply to possible interests that may arise in the future but that do not currently exist, as such interests are inherently speculative and uncertain. For example, a pending application for a particular job is a current interest, but the mere possibility that one might apply for such a job in the future is not a current interest.
13. Any significant and relevant interests that would constitute a real, potential or apparent conflict of interest must be disclosed. If in doubt about whether an interest should be disclosed, individuals are encouraged to seek advice from the Secretariat. Significant and relevant interests may include, but are not limited to consulting relationship, membership of advisory committees associated with private sector, memberships of the boards of non-profit or advocacy groups, financial investments, intellectual property interests, commercial interests, sources of research support, personal relationships, and competition for recognition, funding, or publication. Significant and relevant interests may also include those relevant interests of parties with whom an individual has a current contractual relationship or substantial common interests and which could be perceived as unduly influencing, or likely to unduly influence, the individual's judgement (for example their employer(s), close professional associates, their administrative unit or department, sponsoring or funding entities). Individuals should also disclose significant and relevant financial interests of any person with whom the individual has a substantial business or relevant shared interest.
14. Employment, affiliation, or receipt of financial or other support from a government, international organization, academic institution, civil society organization or private-sector entity does not, in itself, constitute a conflict of interest. The relevant consideration is whether the nature of the interest, relationship or affiliation could reasonably be expected to impair or give rise to a reasonable perception of impairment of, the individual's objectivity and independent scientific judgment in relation to the Panel's work. Disclosure of an interest is intended to enable its assessment and management and does not, in itself, establish the existence of a conflict of interest.
15. Individuals directly involved in the preparation of Panel outputs and deliverables should not participate in the formal review, approval, endorsement, or acceptance of those outputs in any capacity.

#### **D. Implementation procedures**

16. Individuals appointed to participate in the Panel's work do so in their individual expert capacity and not as representatives of their employers, governments or other organizations, unless the Panel expressly provides otherwise. Accordingly, participation in the Panel does not constitute representation of a particular sector or interest group. Where expertise or perspectives from a particular sector are relevant to the Panel's work, including from the private sector, individuals may nevertheless be selected on the basis of their expertise and participate in their individual expert capacity, subject to the requirements of this Conflict-of-Interest Policy.
17. Compliance with the COI Policy is mandatory. Where a conflict of interest is identified, a person may only proceed to participate in Panel activities if action is undertaken such that the conflict of interest is properly managed.

##### **a. Expert Committee members: review process prior to appointment**

18. The Conflict-of-Interest Disclosure Form ("the COI Form") contained in the Annex to this COI Policy will be submitted by each candidate for membership of the Expert Committee through secure digital systems designated by the Secretariat. The Secretariat will review the COI Forms. The Secretariat shall maintain the submitted COI Forms and related information using appropriate technical and organizational safeguards and in accordance with applicable policies and procedures for information security and records management. Where the Secretariat determines that a candidate for the Expert Committee membership has a conflict of interest that cannot be resolved, the individual will not be eligible for the Expert Committee.

##### **b. Expert Committee members: review process after appointment**

19. All members of the Expert Committee will inform the Secretariat of any material change to the information provided in their COI Form and will, in any event, confirm or update the information annually. The Secretariat will review the updated information and determine whether any conflict of interest exists, whether it can be managed, and what further action is necessary in accordance with this COI Policy. Where appropriate, the Secretariat will consult with the Co-Chairs and Vice-Chairs of the Expert Committee, excluding any individual directly concerned by the matter.
20. Where a conflict of interest is identified, the Secretariat shall, in consultation with the individual concerned, determine appropriate measures to manage or resolve the conflict. Such measures may include disclosure of the relevant interest, restrictions on participation in particular discussions or activities, recusal from consideration or decision-making on specified matters, or other appropriate safeguards. Where a conflict cannot be adequately managed, or where an individual fails to disclose a relevant interest, fails to comply with a required recusal or otherwise materially fails to comply with this Policy, the individual may be suspended from participation in the relevant activity or, where warranted, removed from membership of the Expert Committee in accordance with the applicable appointment arrangements.
21. Any decision to suspend or remove a member under paragraph 19 should be taken through a defined and procedurally fair process, including notice to the individual of the concern and an opportunity to provide relevant information or explanations, except where immediate interim measures are necessary to protect the integrity of the Panel's work. Decisions should be appropriately documented.

**c. Members of ad hoc expert groups: review process prior to appointment**

22. Before an individual is appointed to a role under any ad hoc expert groups, the Secretariat will request the individual to complete the COI Form. Before an individual can take on the role in question, the Secretariat will evaluate the form to determine whether the individual has a conflict of interest that cannot be resolved.
23. In exceptional circumstances and in consultation with the Co-Chairs and Vice-Chairs of the Expert Committee, a conflict of interest on the part of an individual which cannot be resolved may be tolerated where the individual is deemed to provide a unique contribution to a Panel deliverable and where it is determined that the conflict can be managed such that it will not have an adverse impact on the relevant Panel deliverable. In such cases, the Secretariat will publicly disclose the conflict and the reasons for determining that the individual may continue to contribute to the Panel's work in spite of the conflict.

**d. Members of ad hoc expert groups: review process after appointment**

24. All members of any *ad hoc* expert group, will inform the Secretariat of any changes in the information provided in their previously submitted COI Form as they arise. The Secretariat will review the updated information, determine whether the individual has a conflict of interest that cannot be resolved and determine what further action is necessary in accordance with this COI Policy and in consultation with the Co-Chairs and Vice-Chairs of the Expert Committee.

**e. Ad hoc expert groups: exceptions from disclosure requirements**

25. Notwithstanding paragraphs 19 and 20, an individual may decline to disclose information related to specific activities, interests and funding where its disclosure would adversely and materially affect:
  - (a) Defense, national security or imminent public safety;
  - (b) The course of justice in prospective or current court cases;
  - (c) The ability to assign future intellectual property rights; or
  - (d) The confidentiality of commercial, government, or industrial information.
26. Individuals who decline to disclose specific information in accordance with paragraph 21 must declare that they are doing so in their disclosure of interest under paragraphs 19 or 20, and the individual should not participate in the relevant activity unless the Secretariat determines that sufficient safeguards can be implemented without disclosure of the protected information.

**E. Principles for identifying and managing Conflict-of-Interest issues**

27. The Secretariat should consult the relevant individual where it has concerns about a potential conflict of interest and/or where it requires clarification of any matters arising out of a COI Form and should ensure that the relevant individuals and, where appropriate relevant nominator, have an opportunity to discuss any concerns about a potential conflict of interest.
28. Where the Secretariat has determined that an individual has a conflict of interest, it will, in consultation with the individual, explore options for resolving the conflict. Individuals might, for example, resolve a conflict of interest by divesting themselves of the particular financial or other interests which gave rise to the potential conflict or by recusing themselves from discussions or decision-making processes in respect of which they have a relevant conflict. Where a conflict of interest cannot reasonably be managed, the individual shall not be eligible for appointment to, or shall cease to participate in, the Expert Committee, as applicable.

29. Where the Secretariat has determined that an individual has a conflict of interest that cannot be resolved, the relevant individual may request the Co-Chairs and Vice-Chairs of the Expert Committee, excluding any individuals directly involved, to review the Secretariat's determination. The Co-Chairs and Vice-Chairs of the Expert Committee may confirm, vary or overturn the determination, or remit the matter to the Secretariat for reconsideration. The individual will be bound by the determination of the Secretariat pending the outcome of the review.
30. Any person involved in reviewing, determining, or deciding conflict of interest issues should not participate in the consideration or determination of a matter concerning themselves, or in a matter where they have a conflict of interest or other circumstance that could reasonably call into question their impartiality.

**F. Processing and storage of information**

31. All COI Forms and any records of the deliberations and decisions in relation to conflict-of-interest issues in respect of specific individuals and any information disclosed by individuals for the purposes of the Conflict-of-Interest Policy will be securely digitally archived by the Secretariat and retained for a period of five years after the end of the individual's participation in the relevant Panel role or activity, after which the information will be destroyed. Subject to the requirement to notify the existence of a conflict of interest to others under paragraph 24 above, the information referred to above will be considered confidential and will not be used for any purpose other than consideration of conflict-of-interest issues under these Implementation Procedures without the express consent of the individual providing the information.
32. The Secretariat should submit a report on its activities in implementing the COI Policy to the Expert Committee at least four weeks before each session. Issues of confidentiality will be addressed by the Secretariat as early as possible.

## **Annex to the Conflict-of-Interest Policy**

### **Conflict-of-Interest Disclosure Form (“COI Form”) for the Independent Panel on Evidence for Action against Antimicrobial Resistance (IPEA)**

#### *Confidential*

Name:

Address:

Email address:

Telephone no.:

Current employer:

Function/role in the Panel:

You have been invited to serve on the Independent Panel on Evidence for Action against Antimicrobial Resistance (IPEA, the Panel) because of your professional standing and expertise. As is outlined in the Panel’s Conflict-of-Interest Policy, the objective of the Panel requires special attention to issues of scientific independence and conflicts of interest in order to maintain the integrity, credibility, relevance and legitimacy of, and public confidence in, its outputs and processes. It is essential that the work of the Panel is not compromised by any conflict of interest; as a result, disclosure of certain circumstances is necessary. When you are filling out this form, we rely on your professionalism, common sense and honesty.

The disclosure of significant and relevant interests is required as a matter of due diligence so as to provide appropriate assurance to the Panel with regard to matters of conflicts of interest, ensure professional and scientific integrity, and protect the Panel and its participants from reputational risk.

The disclosure of significant and relevant interests is required in accordance with the Panel’s Conflict-of-Interest Policy. You should disclose interests that could: (a) significantly impair your objectivity in carrying out your duties and responsibilities for the Panel; or (b) create an unfair advantage for you or any person or organization, and which could result in your securing a profession, financial or other non-financial gain through outcomes related to a Panel process or deliverable.

In accordance with the Conflict-of-Interest Policy, circumstances that could lead a reasonable person to question your objectivity or ask whether an unfair advantage has been created constitute a potential conflict of interest and should be disclosed on this form.

You must also declare any relevant interests of parties with whom you have current contractual relationships or substantial common interests and which could be perceived as unduly influencing, or likely to unduly influence, your judgment (e.g. your employers, close professional associates, administrative unit or department, any sponsoring or funding entities).

A brief description should be provided in relation to the questions outlined below. You should aim to provide sufficient and explicit information to allow the Panel to form a view on whether the circumstances disclosed give rise to an actual or potential conflict of interest.

Once completed, please sign and date the form in the space provided and return it to the Secretariat of the Panel, along with a curriculum vitae and information supporting the disclosures made, where applicable. Please retain a copy for your records.

You must promptly inform the Secretariat of any change concerning the information provided prior to or during the course of your work or meetings for the Panel. This form and the declarations contained therein must be completed before participation in the Panel activity can be confirmed.

Answering “yes” to a question on this form does not necessarily mean that a conflict is present or that you will be unable to perform your designated function or role in the Panel. If in doubt about whether an interest should be disclosed, you are encouraged to disclose that information. The information will be assessed as a whole on the basis of the Conflict-of-Interest Policy. If you have questions about the process of completing this disclosure form, you are encouraged to seek advice from the Secretariat.

### Definition of “conflict of interest”:<sup>1</sup>

A “conflict of interest” refers to any professional, financial, or other non-financial interest which could:

- (a) significantly impair the individual’s objectivity in carrying out their duties and responsibilities for the Panel, or
- (b) create an unfair advantage for any person or organization.

For the purposes of this policy, circumstances that could lead a reasonable person to question an individual’s objectivity, or whether an unfair advantage has been created, constitute a potential conflict of interest. These potential conflicts are subject to disclosure.

### Part I. Commercial and financial interests

|   |                                                                                                                                         |            |           |
|---|-----------------------------------------------------------------------------------------------------------------------------------------|------------|-----------|
| 1 | Do you hold any position or appointment or have any business or professional relationships with other bodies related to science on AMR? | <b>Yes</b> | <b>No</b> |
|---|-----------------------------------------------------------------------------------------------------------------------------------------|------------|-----------|

**Details:**

|   |                                                                                                                                                                                                                                                          |            |           |
|---|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|-----------|
| 2 | Do you receive any remuneration (e.g. employment or consulting, including services as a technical or other adviser) from a commercial entity or other organization with an interest related to the subject of the Panel’s work in which you are engaged? | <b>Yes</b> | <b>No</b> |
|---|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|-----------|

**Details:**

|   |                                                                                                                                                                           |            |           |
|---|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|-----------|
| 3 | Do you receive financial support from any commercial entity or other organization with an interest related to the subject of the Panel’s work (e.g. a government agency)? | <b>Yes</b> | <b>No</b> |
|   | (a) Research support, including grants, collaborations, sponsorships, other funding                                                                                       | <b>Yes</b> | <b>No</b> |

**Details:**

|  |                                                                                                                                                                                                            |            |           |
|--|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|-----------|
|  | (b) Support, including honorariums, for being a panellist, giving speeches or providing training to a commercial entity or other organization with an interest related to the subject of the Panel’s work? | <b>Yes</b> | <b>No</b> |
|--|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|-----------|

**Details:**

|   |                                                                                                                                                                                                     |
|---|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 4 | Do you have investments in any commercial entity with an interest related to the subject of the Panel’s work? (Please also include indirect investments such as a trust or holding company. You may |
|---|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

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<sup>1</sup> Definition taken from section C of the Panel’s conflict-of-interest policy, which is available at [URL to be inserted].

exclude mutual funds, pension funds or similar investments that are broadly diversified and over which you exercise no control.)

(a) Stocks, bonds, stock options, other securities (e.g. short sales) **Yes** **No**

**Details:**

(b) Commercial business interests (e.g. ownership, partnerships, joint ventures, board memberships, controlling interests) **Yes** **No**

**Details:**

5 Do you own any intellectual property rights that might be affected by the Panel's work?

(a) Patents, trademarks or commercial copyrights (including pending applications) **Yes** **No**

**Details:**

(b) Proprietary knowledge of a technology or process being used for commercial purposes **Yes** **No**

**Details:**

6 Do you hold any financial interests per year which outside parties could consider might represent or give rise to a conflict of interest, or the perception of a conflict of interest, with regard to your Panel service? **Yes** **No**

**Details**

7 As part of a regulatory, legislative or judicial process, are you providing any expert opinion or testimony related to the subject of the Panel's work for a commercial entity or other organization? **Yes** **No**

**Details:**

## Part II. Professional and other non-financial interests

**Details:**

8 Do you receive non-financial support valued in excess of US\$10,000 per year (e.g. premises, equipment, facilities, assistants, paid travel, etc.) from any commercial entity or other organization with an interest related to the subject of the Panel's work (e.g. a government agency)? **Yes** **No**

**Details:**

9 Are you engaged in any professional or other activities which outside parties could consider might represent or give rise to a conflict of interest, or the perception of a conflict of interest, with regard to your Panel service? **Yes** **No**

**Details:**

Are you involved in any of the following:

- 10 (a) Official function in a government agency or international organization? **Yes No**  
**Details:**
- (b) Advisory committee associated with a public or private sector organization? **Yes No**  
**Details:**
- (c) Senior editorial role or assignment? **Yes No**  
**Details:**
- Do you serve as any of the following:*
- (d) Board member of a public or private sector organization? **Yes No**  
**Details:**
- (e) Board member of a non-profit organization? **Yes No**  
**Details:**
- (f) Board member of an advocacy group? **Yes No**  
**Details:**

### Part III. Additional information

- 11 If not already disclosed above, are you aware of any aspect of your work for the Panel that will enable you to obtain access to proprietary information or create for you a competitive advantage in your professional, financial or business dealings? **Yes No**  
**Details:**
- 12 To your knowledge, could the outcome of your work for the Panel adversely affect the interests of any other persons or entities with whom you have substantial common personal, professional, financial or business interests (such as your adult children or siblings, close professional colleagues, administrative unit or department)? **Yes No**  
**Details:**
- 13 Which organization is covering, in part or in full, your Panel-related travel costs?  
**Details:**
- 14 Are you receiving any payments (other than for travel costs) or honorariums for speaking publicly on the subject of the Panel's work in which you are engaged? **Yes No**  
**Details:**

- 15** Is there any other aspect of your background or present circumstances not addressed above that you consider might be perceived as affecting your objectivity or independence? **Yes** **No**

**Details:**

Signature: \_\_\_\_\_

Date: \_\_\_\_\_