

## CONFLICT OF INTEREST (COI) POLICY

### Introduction

This policy addresses Conflict of Interest (COI) to ensure highest standards of ethics and integrity. It is to protect organizational interests and reputation. This policy also prevents its work and protect its employees from potentially damaging instances of impropriety arising from Conflict of Interest (COI) issues. The objective is that members must carry out their work in an environment that is free from any proposition of improper influence and take all reasonable steps to avoid being in an actual, apparent or potential Conflict of Interest (COI).

The Conflict of Interest (COI) may arise in a situation where financial or other personal or professional considerations compromise an individual's objectivity, professional judgment and ability to perform his or her professional responsibilities to the Institute.

All employees have a legal duty to perform their duties with honesty to the Institute. A breach of this may result into erosion of the trust and confidence in the integrity of the Institute. Disciplinary action will be taken in case of breach of this policy. It is, therefore, the duty of all associated with IMS to ensure that these interests do not create a Conflict of Interest (COI) or a perception of a conflict of interest.

### Scope

This policy applies to all IMS employees including faculty and non-faculty and all those employees associated with the Institute in contractual obligations. This policy applies to all situations where an employee's personal interests appear to influence the objective exercise of his or her official duties.

### Definition

There is no legal definition of an 'interest' and it should therefore be considered as a broad term which includes any activity or association in which an employee has a personal interest and is in conflict with an individual's ability to properly discharge his/her duties and responsibilities to the best interest of the Institute or otherwise affects its integrity and confidence. It refers to a situation where a conflict arises for an individual between two competing interests and may be termed as perceived, potential or actual conflict of interests.

Interests may relate to property, resources, relationships, information or opportunities and are often 'financial' or 'non-financial' in nature, which may mean that an individual or associated person may stand to gain a benefit or suffer a loss, whether directly or indirectly, as a result of holding such interests. Interests which generally would require disclosure include:



1. Financial Interests
2. Non-Financial Interests

## **1. Financial Interests**

It means anything of monetary value, including, but not limited to payment of services, commission, consultancy fees, equity interests, remittance of debt, property rights (e.g. patents, copyrights and intellectual property rights).

## **2. Non-Financial Interests**

It refers to any non-financial benefit or advantage, including but not limited to direct or indirect enhancement of an individual's career, education or gain to immediate family (or a person with whom the person has a close personal relationship).

### **Recognizing Conflict of Interests**

A conflict of interest may arise due to personal or business relationship of employees. In such cases, an individual's personal interests compete with his/her professional requirements to an organization, which may result in the practice of biased decision for considerations of personal financial gains. Such situations can have potentially damaging consequences for the integrity and reputation of the organization. Thus, conflict of interest can compromise an individual's ability to perform his/her duties and responsibilities objectively.

### **Management and Administration**

Management and Administration of the Institute are likely to be at higher risk of exposure to individuals or scenarios in which fraud, bribery or corruption is more likely to occur. These people are expected to avoid conflicts of interest in all circumstances and should promote transparency and integrity as part of their primary role.

### **Senior Staff/Faculty Members**

The HODs and senior staff/faculty members are also required to disclose interests. Senior staff/faculty members also have a leadership role to play in promoting the importance of disclosing interests and support staff accordingly in doing so. These people would be expected to be a first point of contact for staff in their areas of responsibility in helping to assess a particular activity or scenario on the grounds of an actual or potential conflict of interest. They should do this in consultation with colleagues, the Head of Departments and with reference to this Policy.

### **Guidelines on Conflicts of Interest**

In case of following situations, conflict of interest should be disclosed.

1. Entering into a business or other contract/transaction on behalf of the Institute with a company or firm in which IMS employee has a financial interest.
2. Influencing the purchase of equipment, materials or services for the Institute from a company or firm in which IMS employees have financial interest.
3. Accepting gifts, benefits or favors from individuals or firms with which the Institute does business, except as token courtesies.
4. Directing students or staff of the Institute to carry out work for a company or firm in which IMS employees have a financial interest.



5. Using the Institute's resources or facilities for a personal benefit or the benefit of related persons.
6. Influencing the appointment, hiring, promotion or evaluation of a person.
7. Using the position to serve the interests of an employee of the Institute.

## **Avoidance of Conflicts of Interest**

All staff/faculty members must avoid conflict of interest by understanding the policy regarding COI and adopting as a practice to declare their personal/professional interests before joining any Committee/official responsibility.

## **Procedures for Managing a Conflict of Interest**

All employees of the Institute are considered to be in a position of trust by virtue of their employment with the Institute and therefore have a responsibility to identify and disclose known or potential personal, family, pecuniary or business interests which may interfere, or be perceived to interfere, with an individual's ability to properly discharge his or her duties to the Institute to ensure that such conflicts are seen to be properly managed or avoided.

It is the duty of every staff member to disclose any conflict of interest or any circumstances that might reasonably give rise to the perception of conflict of interest to the Dean, HODs or the Registrar as the case may be. All employees' inquiries regarding any aspect of COI policy should be directed to Registrar's Office.

The general rule is that disclosure should be made at the time the conflict first arises, or it is recognized that a conflict might be perceived, in writing to the Rector of the Institute. If the Rector has an interest in the matter to be discussed, the disclosure shall be made to the Registrar.

Any staff/faculty having any interest in any matter to be discussed or decided by any committee shall, prior to any discussion of the matter, disclose in writing, respectively, to the committee, as the case may be, the fact of his interest and the nature thereof.

A disclosure of interest shall be recorded in the minutes note for record or other appropriate record-keeping documents and member concerned will not take part nor be present in any deliberation or decision-making process of the Committee and shall be disregarded for the purpose of constitution of a quorum of the Committee.

Compliance with this Policy is compulsory. A staff/faculty member who fails to comply may be subject to disciplinary action, depending upon the severity of non-compliance. Failure to comply may be viewed as gross misconduct and the member of staff/faculty involved may be subject to disciplinary action.

## **Violations of the Conflict of Interest (COI) Policy**

Where a conflict of interest was not disclosed by the member before the transaction took place, the issue should be brought to the notice of the management that can take the following routes:

- i. If the management has a reasonable cause to believe that a person has failed to disclose actual or possible conflicts of interest, it shall inform the person of the basis for such belief and the person may be given an opportunity to explain the alleged failure to disclose.
- ii. After hearing the response of the interested person and making further investigation as may be warranted in the circumstances, the management will determine that the person has in fact failed to disclose an actual or possible conflict of interest; it will initiate appropriate disciplinary and corrective action. This action may include, but is not limited to:
  - a. Issuance of a Warning or
  - b. Financial Penalty or
  - c. Termination from Service



February 18, 2025  
R-IMS/NTF/2025/105A

## NOTIFICATION

**Subject: Policies/Documents Approved in 33<sup>rd</sup> Academic Council Meeting**

1. This refers to the Academic Council Meeting held on February 18, 2025; the forum has consented for the approval / adoption of policies/committees/documents related to the curriculum and co-curriculum affairs of the Institute of Management Sciences, Lahore. The list of policies/ documents is as follows:

- i. Management Science – Departmental Vision, Mission and Strategic Plan 2025-2029.
- ii. Management Science – Departmental Alumni Association.
- iii. PhD/MPhil Program Research Guidelines / Policy.
- iv. Faculty Development Plan – 2025.
- v. Internship Policy
- vi. Alumni Engagement Policy
- vii. Career Counselling Policy
- viii. Intellectual Property Policy
- ix. IMS Code of Conduct
- x. Formal System of Planning and Evaluation
- xi. IMS Organogram
- xii. Conflict of Interest Policy
- xiii. Grievance Policy
- xiv. Community Service Policy
- xv. IMS Procurement Policy
- xvi. Policy on Ethical Standards

2. The policies/documents are in effect till further notified.

- Policies/documents are attached with this notification.

  
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REGISTRAR

Brig. Mahmud Bashir Bajwa (Retd.)

CC:

- All concerned