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POLICY REGARDING POLICY CONFLICTS OF INTEREST

SSF is a non-profit foundation, i.e. it promotes purposes that benefit society; strong research environments and the development of Sweden's future competitiveness. SSF's non-profit mission means that the trust of the surrounding society is central. Conflict of interest refers to doubts about impartiality. Conflict of interest rules aim to guarantee objectivity and impartiality in preparation, presentation and position taking and to create the aforementioned trust among those concerned and the public for this to happen.

Overall provisions on conflict of interest for foundations are set out in the "*Stiftelselag* (2 Kap. 14 §)". SSF applies the following conflict of interest rules on its own initiative that go beyond what is stated in the "*Stiftelselag*".

SSF's conflict of interest rules are aimed at everyone who handles a matter. The concept here includes both the people who prepare and present as well as those who make decisions, regardless of whether these are members of the board, CEO, review group (or equivalent), external expert or administrators, thus everyone who can influence the outcome of a matter.

1 Different types of conflicts of interest

Conflicts of interest involving private interests, personal involvement or family ties disqualify the person charged with handling a matter

- if the matter concerns the person himself or his spouse, parent, child, sibling or other closely related person
- if the person or someone closely related to him can expect extraordinary advantage or detriment from the outcome of the matter.

Conflicts of interest involving legal representation disqualify the person charged with handling a matter

- if the person or someone closely related to him is the legal representative of someone that the matter concerns
- if the person or someone closely related to him is the legal representative of someone who can expect extraordinary advantage or detriment from the outcome of the matter.

Conflicts of interest involving organizational roles can arise in connection with oversight matters. A possible example in the Foundation would be if the chairman of a Foundation programme were to be appointed as a member of the Governing Board of the Foundation and the Board were to decide on a matter of importance for the programme in question.

Conflicts of interest involving proxies or agents disqualify the person charged with handling a matter

- if the person has served someone as a proxy or has assisted that person for payment as regards the material issue.

Institutional conflicts of interest disqualify the person charged with handling a matter

if the person is a vice-chancellor, faculty dean, department head or member of a university or college board, in cases where the institute of higher learning receives, or may receive, grants from the Foundation. This may also apply to the Executive Director or the like and a board member at a research institute.

Conflicts of interest involving sensitive situations disqualify the person charged with handling a matter

- if there is some other special circumstance that is likely to undermine confidence in his impartiality in the matter that is not covered by the aforementioned COI categories.

Examples of conflicts of interest involving special circumstances are:

- close collaboration in a professional context
- obvious friendship or enmity
- relationship of economic dependency
- superior/subordinate relationship
- someone involved in the matter in a way that may arouse doubts as to their ability to render an impartial judgement.

2 Managing conflicts of interest

It is the obligation of board members and other persons charged with handling a matter to spontaneously furnish information regarding possible grounds for COI. If a possible COI is not reported via the application portal, the disqualified person shall report the COI in good time before a meeting of the board or evaluation committee (or equivalent) to the responsible secretary, who in turn notifies the chairman.

It is up to the chairman of the board or the selection group (or equivalent) to make sure that COI are managed properly, when necessary with the assistance of collaborating officials. If there is any question, the management of SSF should be consulted. The working group decides how to apply the COI policy in each individual case. In doubtful cases the person should be disqualified.

The COI policy shall be described the first time a new group meet or a new member is added. All members (or equivalent) shall declare that they understand and support the policy. The possible existence of a COI shall be noted in the minutes each time the question is brought up, even in cases where the working group concludes that there is no COI. At meetings when minutes are not normally kept, any COI situations shall nevertheless be recorded.

A person disqualified for COI may not be present when an application or the equivalent is presented, discussed or decided on. The rule is that the disqualified person should leave the room while the matter is being dealt with. Depending on the context, a person may be

Appendix E, Translation. Swedish original has priority. Replaces version 2025-08-26 discharged from all or parts of the assessment process in which an application for which the person in question has a COI is being considered.

2.1 External reviewers, evaluators etc.

External experts, both Swedish and international, shall be queried about possible COI situations when applications or mid-term and final reports are ready to be assessed or

reviewed. The reviewer shall describe on SSF's application portal what type of relationship she/he has or has had with the applicants in question. In cases where the portal is not used, the equivalent declaration shall be made in writing in another way.

2.2 Practice of the Governing Board

The following shall apply in addition to what is stated in [*Stiftelselag* (2 Kap. 14 §: "En styrelseledamot får inte handlägga frågor som rör avtal mellan honom och stiftelsen")]] and in these rules:

2.2.1. A board member may not apply for a grant from SSF, neither as a main applicant nor co-applicant, from the date of his/her appointment, during the active term of office and six months after leaving the board. The period of ineligibility may be extended even further in cases where a departing board member has participated in the design of a specific call for proposals.

2.2.2. In the event of a matter at a board meeting concerning a decision on a call for proposals (call text) and if a person related to the member (see point 1 above) may apply for funds, the member shall not participate/be present during the entire agenda point.

2.2.3. In the event of a matter at a board meeting concerning a decision on a grant recipient and if the member, or a person related to the member, has applied for funds, the member shall not participate/be present during the entire agenda point.

2.2.4. In the event of a matter at a board meeting concerning overall strategic discussions regarding areas of focus or forms of grants, all members shall participate.

2.2.5. Members do not participate in preparatory committees, or as experts, in order to distinguish between preparatory and decision-making bodies.

3 Outside activities

An employee or contractor may not have employment or assignments or perform other activities that might undermine confidence in her/his or any other employee's impartiality or otherwise harm SSF's reputation.

In accordance with the rules for outside activities established by the Governing Board, board members and secretariat employees must at the end of each year openly disclose any outside positions such as board member, adviser, committee member or any assignment in any other organization whose activities impinge, or may be construed by others to impinge, upon SSF's activities. This information shall be updated continuously.