

Brain Research Africa Initiative

*An International Organisation, Executive Member of International Brain Initiative (IBI);
In Partnership with the African Union Commission*

Financial Conflict of Interest Policy

Effective Date	Action Taken	Approved By	Date Approved
2022	Initial Policy	Executive Committee	
10/03/2024	Policy Revision	Executive Committee	25/03/2024
25/04/2025	Policy Revision	Executive Committee	30/11/2025

Policy Statement

This detailed Financial Conflict of Interest (FCOI) policy is the cornerstone of Brain Research Africa Initiative's (BRAIN's) commitment to integrity, transparency and objectivity in all research. It provides robust procedures for identifying, managing, and eliminating potential conflicts of interest, ensuring that public trust in research is upheld and that all activities meet the binding legislatures of Cameroon, and funding countries as well as international best practice requirements and those of funding agencies. The objective of this policy is to ensure that BRAIN staff members while conducting research, ensure respect of their governance responsibilities in an honest, open and ethical manner and in compliance with the law, to limit or avoid any real or perceived conflicts of interests.

Purpose and Applicability

BRAIN is unequivocally committed to maintaining the highest ethical standards and integrity in the pursuit of scientific knowledge through research. We acknowledge that collaboration with external entities is vital for innovation, but it can introduce financial interests that may compromise, or appear to compromise, the integrity of the research process. This policy serves to promote objectivity by requiring the disclosure and management of Significant Financial Interests (SFIs) that could potentially bias the design, conduct, or reporting of research.

Applicability: This policy applies to all "Investigators", defined broadly as any person (faculty, staff, trainees, subrecipients, consultants, or collaborators) who is responsible for the design, conduct, or reporting of research. All staff are individually and collectively expected to operate to high ethical research standards, and in the best interests of BRAIN. Conflicts may be real, perceived or potential and may be financial or non-financial. An Investigator's first and primary responsibility is to support and advance BRAIN's research mission rather than advance their personal and/or familial financial interests. Extra scrutiny must be given to potential Financial Conflict of Interest (FCOI) in research involving human subjects. Disclosure of SFI is necessary for the identification of FCOI.

Definition of Conflict of Interest

A conflict of interest arises when a staff member has, or is perceived to have, a personal, family or business interest or is involved in other community or professional activities that might benefit from a decision in which he/she is involved in making, or is able to influence those making it and/or is involved with a competing or sister organisation that may result in a divided/ limited loyalty in the context of making a decision. Voting for or against, or arguing for or against, a particular outcome may influence a decision. Limiting the options being considered may also influence the scope of the conflict of interest.

IDE CHE – 185.183.725

No. 00000359/ARDA/JO6/ALPAS/APPB

UEID: X2X3VNLXLKE1

Executive Office: Rue Obobogo, Yaoundé

Website: <https://brainafrica.org>, **PO Box:** 25625 Yaoundé, Cameroon



Brain Research Africa Initiative

*An International Organisation, Executive Member of International Brain Initiative (IBI);
In Partnership with the African Union Commission*

Definitions of Significant Financial Interest (SFI)

An SFI exists if the value of remuneration received by the Investigator (or their spouse and dependent children) from an entity in the 12 months preceding disclosure exceeds 2,500,000XAF (\$5,000). This includes remuneration from entities such as:

- **Public Entities:** Aggregate of salary, royalties, and stock value > 2,500,000XAF (\$5,000). For purposes of this definition, remuneration includes salary and any payment for services not otherwise identified as salary (e.g., consulting fees, honoraria, paid authorship); equity interest includes any stock, stock option, or other ownership interest, as determined through reference to public prices or other reasonable measures of fair market value;
- **Non-Public Entities:** Any equity interest or remuneration > 2,500,000XAF (\$5,000). For purposes of this definition, remuneration includes salary and any payment for services not otherwise identified as salary (e.g., consulting fees, honoraria, paid authorship); equity interest includes any stock, stock option, or other ownership interest, as determined through reference to public prices or other reasonable measures of fair market value; or
- **Intellectual Property:** Income from rights and interests (e.g., patents, copyrights) or when the staff member / Investigator (or the Investigator's spouse or dependent children) holds any equity interest (e.g., stock, stock option, or other ownership interest); or upon receipt of income related to such rights and interests;
- **Foreign Interests:** All financial interests received from foreign governments or foreign institutions of higher education (including sponsored travel) exceeding 2,500,000XAF (\$5,000);
- **Travel:** Reimbursed or sponsored travel related to institutional responsibilities. This relates to travel which is paid on behalf of the Investigator and not reimbursed to the Investigator so that the exact monetary value may not be readily available, related to their institutional responsibilities; provided, however, that this disclosure requirement does not apply to travel that is reimbursed or sponsored by a federal, state, or local government agency, an institution of higher education, an academic teaching hospital, a medical center, or a research institute that is affiliated with an institution of higher education.

Travel disclosures must include, at a minimum, the purpose of the trip, the identity of the sponsor/organizer, the destination, and the duration. A designated BRAIN Institutional official will determine if further information is needed, including a determination or disclosure of monetary value, in order to determine whether the travel constitutes an FCOI. Disclosures exclude travel reimbursed by a U.S. Federal, state, or local government agency, an institution of higher education, a research institute affiliated with an institution of higher education, a teaching hospital, or a medical center.

FCOI does not include the following

The term significant financial interest does not include the following:

1. Salary, royalties, or other remuneration paid by BRAIN to the Investigator if the Investigator is currently employed or otherwise appointed by BRAIN, including intellectual property rights assigned to BRAIN and agreements to share in royalties related to such rights.
2. Income from investment vehicles, such as mutual funds and retirement accounts, as long as the Investigator does not directly control the investment decisions made in these vehicles.



Brain Research Africa Initiative

*An International Organisation, Executive Member of International Brain Initiative (IBI);
In Partnership with the African Union Commission*

3. Income from seminars, lectures, or teaching engagements sponsored by any public governmental institution.
4. Income from service on advisory committees or review panels for a public governmental institution

Definition of Investigator

Investigators are defined as the Principal Investigator (PI) or Project Director (PD), the Co-PI or Co-PD, and any other person, regardless of title or position, who would be responsible for the design, conduct, or reporting of research, including non-BRAIN investigators, consultants, and unpaid collaborators. The BRAIN Administrator is required to consider the role, rather than the title, of those involved in research and the degree of independence with which those individuals work.

Step-by-Step Compliance Process

At recruitment, all BRAIN staff members complete the Mandatory Training available online. The staff member then submits their Declaration of Interest Form (DIF) before the official assumption of duties. This forms part of the onboarding and induction process of the staff member. Declarations are mandatory even for nil returns.

Annually: A mandatory annual submission of a personal DIF is required as part of the annual checks process for all staff members.

Ad hoc disclosures: Staff members must declare any further or additional interest as soon as they become aware of changes in their initial submission.

Upon submission, the institutional official – Administrator is for reviewing and determining if a conflict exists or not. Decisions taken by the FCOI Committee shall be notified to the researcher within seven working days. They will also be made available to the public on request. Corrective measures and sanctions will be implemented immediately after notification to the researcher under the supervision of the Administrator. Researchers who fail to comply with this policy and with the decisions of the FCOI are subject to suspension of their research activities and other disciplinary measures provided by the rules and regulations of BRAIN.

Summary process:

	Action	Responsibility	Required From	Timeline
1	Mandatory Training		All staff	Before engaging in research, every 4 years thereafter
2	Initial Disclosure			At the time of application for a grant
3	Annual Disclosure			Annually, during the period of the award
4	Ad-hoc Disclosure			Within 30 days of discovering or acquiring a new SFI
5	Review & Determination		Institutional Official	Within 60 days of disclosure
6	Management Plan			Prior to the expenditure of funds
7	Reporting			Initial report before spending funds; annual updates



Brain Research Africa Initiative

*An International Organisation, Executive Member of International Brain Initiative (IBI);
In Partnership with the African Union Commission*

Roles and Required Signatories

Designated Institutional Official (DIO): Responsible for reviewing disclosures and determining if an SFI relates to research and constitutes an FCOI. At BRAIN, the DIO is the Administrator.

Investigator: Must sign and submit personal DIF to certify the accuracy of project-specific disclosures and ensure all team "Investigators" have disclosed interests.

Reporting and Public Accessibility

Public Access: This policy is available on BRAIN's public website, and upon request in soft or hard copy.

Response to Inquiries: FCOI information must be provided via written response within 5 business days of a request.

The Administrator will submit a report to the Senior Management Team (SMT) and or funded agencies within 60 days, regarding any Investigator SFI found by BRAIN to be a FCOI in accordance with the regulation before expenditure of any funds under a funded research project. BRAIN will also provide an FCOI report whenever an Investigator does not disclose in a timely manner an SFI or whenever, for whatever reason, there has not been a review of a disclosed SFI.

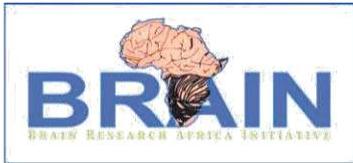
If the above occurs, BRAIN will review all research projects to determine whether any funded research, or portion thereof, conducted during the time period of the non-compliance, was biased in the design, conduct or reporting of such research. Based on the results of the retrospective review, if appropriate, institutional official will update the previously submitted FCOI report; specify the actions that will be taken to manage the FCOI going forward.

If bias is found, BRAIN will notify the funding agency promptly and submit a mitigation report that includes the key elements documented in the retrospective review and a description of the impact of the bias on the research project and the Institution's plan of action or actions taken to eliminate or mitigate the effects of the bias.

The annual FCOI report will be submitted to BRAIN SMT and the funded agency separately through the designated channels. It will include the following:

1. The role and principal duties of the conflicted Investigator in the research project;
2. Conditions of the management plan;
3. How the management plan is designed to safeguard objectivity in the research project;
4. Confirmation of the Investigator's agreement to the management plan;
5. How the management plan will be monitored to ensure Investigator compliance; and
6. Other information as needed.

Records: Records of financial disclosures and all actions taken to resolve FCOI are maintained for three (3) years beyond the termination or completion of employment or the grant to which they relate or until the resolution of any sponsor action involving those records, whichever is longer. Records of financial disclosures and all actions taken to resolve FCOI are maintained for seven (7) years or according to the legal requirements of Cameroon and other funding countries.



Brain Research Africa Initiative

*An International Organisation, Executive Member of International Brain Initiative (IBI);
In Partnership with the African Union Commission*

Management of Financial Conflicts of Interest

Prior to the expenditure of awarded funds, the Administrator reviews all Investigator disclosures of SFI, determines whether any SFI relates to the funded award, and determines whether a FCOI exists. If a FCOI does exist, the Administrator, will create and implement a management and mitigation plan that shall specify the actions that have been, and shall be, taken to manage such FCOI.

Examples of conditions or restrictions that might be imposed to manage a FCOI include, but are not limited to:

- **Public disclosure of FCOI** (e.g., when presenting or publishing the research);
- **Disclosure of FCOI directly to participants** for research projects involving human subjects research,
- **Appointment of an independent monitor** to take measures to protect the design, conduct, and reporting of the research against bias resulting from the FCOI;
- Modify / Adjust the research;
- **Change** personnel and or their responsibilities, or
- **Exempt or disqualify** personnel from participation in all or a part of the research;
- Reduce or eliminate the financial interest (e.g., sale of an equity interest); or severance of relationships that create FCOI;
- Upon implementation of the management plan, the Administrator shall monitor Investigator compliance with the management plan on an ongoing basis until the completion of the funded award

Sub Recipient Awards:

When BRAIN receives a sub-award from a partner institution to conduct a significant portion of research activity or project, BRAIN will be committed to abiding by the policy of the awarding institution regarding FCOI. If BRAIN issues a sub-award to an external partner organization, the sub-awardee will be expected to fully abide by this policy. All identified SFI will be expected to be reported to BRAIN within 30 days of its identification.

Endorsement and Signatures

This policy is hereby adopted by the leadership of the Brain Research Africa Initiative (BRAIN), Executive Committee:

Related References:

1. <https://grants.nih.gov/grants/policy/coi/tutorial2018/FINANCIAL-CONFLICT-OF-INTEREST.pdf>
2. <https://url-shortener.me/5MZM>
3. <https://grants.nih.gov/policy-and-compliance/policy-topics/fcoi>
4. <https://url-shortener.me/5MZH>



Brain Research Africa Initiative

*An International Organisation, Executive Member of International Brain Initiative (IBI);
In Partnership with the African Union Commission*

Title: Investigator Financial Interest Disclosure Form

Organization: Brain Research Africa Initiative (BRAIN)

I. Investigator Information

Name: _____ Role in BRAIN: _____

II. Training Certification

I certify that I have completed the FCOI Training Module within the last 4 years.

Date of Completion: _____

III. Disclosure Statement (Check one)

No Significant Financial Interests: I, my spouse, and my dependent children have no SFIs to disclose as defined by the BRAIN FCOI Policy.

Significant Financial Interests Disclosed: I have the following interests (domestic or foreign) that relate to my institutional responsibilities:

- Entity Name: _____
- Nature of Interest: (e.g., Consulting, Equity) _____
- Estimated Value: 2,500,000XAF – 5,000,000XAF (\$5,000–\$9,999) 5,000,000XAF – 10,000,000XAF (\$10,000–\$19,999) Other: _____

IV. Travel Disclosure

No Sponsored Travel

Travel Disclosed:

- Purpose: _____
- Sponsor: _____
- Destination: _____
- Duration: _____

V. Affirmation & Signatures

I certify that this is a complete and accurate disclosure of my financial interests. I agree to update this disclosure within 30 days of any new SFI and to comply with any management plan required by BRAIN to ensure research objectivity.

Investigator Signature: _____ Date: _____

For Institutional Use Only:

No FCOI identified.

FCOI identified; Management Plan attached.

Designated Official Signature: _____ Date: _____