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| <br>AMERICAN INTERNATIONAL UNIVERSITY<br>الجامعة الأمريكية الدولية | Policy Main Title  | Faculty and Professional Staff      | Effective Date   | 14/06/2026 |
|                                                                                                                                                     | Policy Subject     | Faculty Conflict of Interest Policy | Last Review date |            |
|                                                                                                                                                     | Policy Number      | FAC-010                             | Next Review date | 14/06/2029 |
|                                                                                                                                                     | Responsible Entity | Vic President for Academic Affairs  | Approved By      | President  |

## Overview

American International University is committed to academic freedom, intellectual integrity, and the highest standards of professional conduct. AIU also recognizes that faculty members, by virtue of their expertise and their standing in the academic and professional community, regularly engage in activities beyond their core institutional duties including consulting, research collaboration, professional association leadership, and public engagement. These activities enrich the faculty member's expertise, benefit the institution, and serve the wider community.

At the same time, some of these activities, relationships, and interests can create, or appear to create, situations in which a faculty member's personal, financial, or professional interests may diverge from their obligations to AIU, to their students, to the integrity of their scholarship, or to the institution's standing. This policy establishes the framework within which such conflicts of interest are identified, disclosed, assessed, managed, and, where necessary, mitigated or sanctioned.

This policy is distinct from, but complementary to, the Institutional Conflict of Interest Policy (GOV-002), which governs Board members and senior administrators. It is the faculty-specific instrument. It should be read alongside the Faculty Professional Ethics Policy (FAC-004), which governs professional conduct including the ethics of research, teaching, and collegial relationships, and the Faculty Employment Policy (FAC-003), which governs outside employment. Together these three policies constitute AIU's complete framework for managing faculty conflicts of interest and commitment.

## Scope

This policy applies to all full-time and part-time faculty members and academic non-faculty appointment holders at AIU, including persons holding the ranks of Professor, Associate Professor, Assistant Professor, Senior Lecturer, Lecturer, Senior Instructor, Instructor, and Foundation Program Instructor. Faculty in administrative roles, including Deans, Department Chairs, and Program Coordinators, are subject to both this policy and to GOV-002 in respect of their administrative functions. The policy applies to all professional activities undertaken during the faculty member's employment at AIU, including activities conducted outside AIU or during leave periods.

## Purpose

The purposes of this policy are to:

- Promote transparency, integrity, and accountability in all professional activities of AIU faculty
- Distinguish between prohibited conflicts of interest, manageable conflicts that require disclosure and oversight, and permissible activities that do not require disclosure
- Establish a structured, tiered disclosure system through which all faculty report relevant interests, activities, and relationships annually and on an event-triggered basis
- Define the obligations and limits applicable to outside employment, professional consultancy, and research with financial interests

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|-----------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|-------------------------------------|------------------|------------|
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- Protect the integrity of AIU's intellectual property, research activities, student evaluations, and institutional decisions from improper influence
- Provide a fair, documented process for investigating alleged violations and imposing proportionate sanctions
- Ensure AIU's compliance with honest and ethical operations, scholarship integrity, faculty evaluation integrity, faculty employment policies, and institutional integrity

### Abbreviations and Definitions

**Conflict of Interest:** Any circumstance in which the personal, financial, professional, or other interests of a faculty member, or of their Immediate Family Members, may be reasonably perceived as potentially or actually diverging from the faculty member's professional obligations to AIU, to students, to research integrity, or to the institution's interests.

**Conflict of Commitment:** A situation in which a faculty member's outside activities, whether compensated or not, compromise, or may reasonably be perceived as compromising, their ability to fulfil their full obligations to AIU in teaching, research, service, and administration.

**Outside Activity:** Any activity performed by a faculty member beyond their AIU responsibilities, whether compensated or uncompensated, that involves the expenditure of time, use of expertise, or deployment of resources.

**Professional Consultancy:** Any professional activity in which a faculty member provides services, advice, or expertise to a third party, whether an organization, company, government body, or individual, in exchange for a fee, honorarium, equity, or equivalent benefit.

**Significant Financial Interest (SFI):** Any financial interest in an external entity above a de minimis threshold, including: remuneration (salary, consulting fees, honoraria, or other payments) exceeding KWD 1,000 in aggregate in a twelve-month period; equity or ownership interest in any single entity exceeding KWD 1,000 in fair market value or exceeding five percent of any class of ownership; and intellectual property rights (patents, copyrights, royalties) received from an entity other than AIU

**Immediate Family Member:** A faculty member's spouse; parents; children; siblings; spouse's parents; and any other person living in the faculty member's household who is financially dependent on or supporting the faculty member.

**Annual COI Disclosure Form (ACOID):** The standardized disclosure instrument completed by all faculty members by 30 September each year, documenting all interests, activities, and relationships that may constitute a conflict of interest or conflict of commitment under this policy.

**Managed Conflict:** A conflict of interest that AIU permits to continue subject to a documented Conflict Management Plan, after assessment by the COI Review Committee. Not all conflicts are prohibited; some can be managed through oversight, recusal, and monitoring arrangements.

**Conflict Management Plan (CMP):** A written plan, agreed between the faculty member and the VPAA, specifying the conditions under which a disclosed conflict of interest is permitted to continue, including recusal obligations, monitoring requirements, and reporting timelines.

**Prohibited Conflict:** A conflict of interest that cannot be permitted to continue regardless of any management arrangements, because the risk to institutional integrity, student welfare, research integrity, or AIU's mission is too great to be mitigated.

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|-----------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|-------------------------------------|------------------|------------|
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|                                                                                                                                                     | Responsible Entity | Vic President for Academic Affairs  | Approved By      | President  |

**COI Review Committee:** A standing committee, appointed by the VPAA, responsible for assessing disclosed conflicts, determining whether they are managed or prohibited, recommending CMPs, and investigating alleged violations.

**AIU Institutional Affiliation:** The designation of American International University - Kuwait as the faculty member's primary professional affiliation in all scholarly publications, external presentations, conference participations, and professional activities undertaken during their AIU appointment.

**Research Conflict of Interest:** A conflict of interest that arises in the context of research activities, where a faculty member's financial or personal interests could be perceived to affect the objectivity, design, conduct, reporting, or dissemination of research.

**Recusal:** The formal act of withdrawing from a specific decision, deliberation, vote, or activity because of an actual or perceived conflict of interest. Recusal is documented in writing and retained as part of the institutional record.

## Policy

### Article 1: Governing Principles

AIU's approach to faculty conflicts of interest is governed by the following principles:

- Transparency over prohibition: AIU does not seek to prohibit all outside activities, which would be inconsistent with academic freedom and with faculty development norms at accredited institutions. The primary instrument of this policy is full, timely, and honest disclosure, not blanket restriction.
- Primary commitment to AIU: Faculty members' primary professional obligation is to AIU, to their teaching, research, service, and institutional responsibilities. All outside activities must be structured and limited so that this primary obligation is not compromised.
- AIU as first affiliation: In all scholarly publications, conference presentations, and professional activities undertaken during a faculty member's AIU appointment, American International University - Kuwait is the faculty member's primary institutional affiliation. Using a different institution as primary affiliation without VPAA approval is a breach of this policy.
- Proactive disclosure: The determination of whether a conflict exists is not a self-determination by the faculty member. All interests, activities, and relationships that could reasonably be perceived to create a conflict must be disclosed. Where there is uncertainty, disclose.
- Proportionate management: Not all conflicts require elimination. Where a conflict can be managed through appropriate oversight, monitoring, and recusal arrangements, a Conflict Management Plan is the preferred outcome. Sanctions are reserved for violations.
- Institutional authority: AIU reserves the right to require disclosure of any interest or activity, to investigate any alleged conflict, to impose a Conflict Management Plan or require elimination of a conflict, and to impose sanctions for violations.
- Protection from retaliation: Faculty members who make disclosures in good faith are protected from retaliation under this policy and under GOV-003 (Whistleblower Protection Policy). No adverse employment action may be taken against a faculty member solely for having disclosed a conflict of interest.

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|-----------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|-------------------------------------|------------------|------------|
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|                                                                                                                                                     | Responsible Entity | Vic President for Academic Affairs  | Approved By      | President  |

- h. Fairness: All disclosures shall be assessed objectively, consistently, and without prejudice to the faculty member's academic freedom or legitimate professional activities.

## Article 2: Categories of Conflict of Interest

The following table summarizes the principal categories of conflict of interest applicable to AIU faculty, with examples and the required disclosure and approval response for each. The table is illustrative, not exhaustive; any interest or activity that meets the definition of a conflict of interest in this policy requires disclosure regardless of whether it appears in the table.

| Conflict Category                        | Examples                                                                                                                                                                                                                               | Disclosure and Approval Requirement                                                                      |
|------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------|
| <b>Outside Employment and Consulting</b> | Any compensated work for an external entity in the faculty member's field; private tutoring outside AIU; advisory roles for companies or organizations; government appointments                                                        | Annual ACOID + prior written VPAA approval for each engagement                                           |
| <b>Financial Interest</b>                | Ownership or equity stake in an entity that does business with AIU, recruits AIU graduates, or is affected by the outcome of the faculty member's research or teaching                                                                 | Annual ACOID; threshold disclosures for interests above KWD 1,000 value or 5% ownership                  |
| <b>Research and Funding</b>              | Serving as PI or Co-I on a project funded by an entity in which the faculty member holds a financial interest; accepting consulting fees from a grant sponsor                                                                          | Disclosure at the time of grant submission; ongoing disclosure if the interest arises during the project |
| <b>Family and Personal Relationships</b> | Teaching, supervising, advising, or grading an Immediate Family Member; reporting to, or being supervised by, an Immediate Family Member; participating in hiring, promotion, or salary decisions affecting an Immediate Family Member | Annual ACOID; immediate disclosure upon any change; recusal from all affected decisions                  |

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|-----------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|-------------------------------------|------------------|------------|
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|                                                                                                                                                     | Policy Subject     | Faculty Conflict of Interest Policy | Last Review date |            |
|                                                                                                                                                     | Policy Number      | FAC-010                             | Next Review date | 14/06/2029 |
|                                                                                                                                                     | Responsible Entity | Vic President for Academic Affairs  | Approved By      | President  |

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| <b>Institutional Procurement and Decisions</b> | Participating in a procurement, contract, or supplier selection process involving an entity in which the faculty member or Immediate Family Member holds an ownership, employment, or management interest        | Annual ACOID; immediate disclosure upon learning of a pending transaction; mandatory recusal                |
| <b>Use of University Resources</b>             | Using AIU facilities, equipment, personnel, or confidential information for personal or external activities; using student labor for private projects; exploiting AIU intellectual property for personal benefit | Immediate disclosure; VPAA approval required before any approved use of AIU resources for external purposes |
| <b>Intellectual Property</b>                   | Retaining or assigning AIU-owned intellectual property to a personal or external entity; dual employment agreements requiring assignment of inventions that conflict with AIU's IP policy                        | Immediate disclosure to VPAA and Office of Research; full compliance with AIU IP Policy                     |
| <b>Gifts and Hospitality</b>                   | Accepting gifts, honoraria, free services, travel, or entertainment from students, their families, external vendors, or organizations in a position to benefit from the faculty member's professional decisions  | Annual ACOID; all gifts above KWD 25 must be declined or surrendered to the University                      |
| <b>Governance and Committee Roles</b>          | Serving on an institutional committee where the outcome affects a personal financial interest; serving on a promotion committee for an Immediate Family Member or close collaborator                             | Immediate disclosure; mandatory recusal from affected deliberations                                         |

### Article 3: Primary Commitment and Conflict of Commitment

A faculty member's primary commitment of time, intellectual energies, and professional attention must be to AIU's teaching, research, service, and administrative programs. Outside activities, whether compensated or uncompensated, must not compromise this primary commitment.

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|-----------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|-------------------------------------|------------------|------------|
| <br>AMERICAN INTERNATIONAL UNIVERSITY<br>الجامعة الأمريكية الدولية | Policy Main Title  | Faculty and Professional Staff      | Effective Date   | 14/06/2026 |
|                                                                                                                                                     | Policy Subject     | Faculty Conflict of Interest Policy | Last Review date |            |
|                                                                                                                                                     | Policy Number      | FAC-010                             | Next Review date | 14/06/2029 |
|                                                                                                                                                     | Responsible Entity | Vic President for Academic Affairs  | Approved By      | President  |

### 3.1 Conflict of Commitment Defined

A conflict of commitment arises when a faculty member's outside activities, individually or cumulatively, cause any of the following:

- Interference with scheduled teaching, examination, committee, advising, or administrative obligations
- Failure to meet assessment return deadlines because of time spent on outside activities
- Inability to be available to students during required office hours because of outside engagements
- Inability to meet research or service commitments agreed upon in the Annual Faculty Development Plan
- Fatigue, distraction, or divided attention that materially diminishes the quality of institutional performance

A conflict of commitment constitutes professional misconduct and is subject to the procedures in Article 8 of this policy.

### 3.2 Consulting and Outside Employment Time Limits

The following time limits govern the maximum outside activity permitted for full-time faculty. These limits apply cumulatively to all outside activities and are not per-activity maximums.

| Faculty Classification                                         | Maximum Approved Consulting Time                                                                                                              | Notes                                                                                                                     |
|----------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------|
| <b>Full-time regular faculty (all ranks)</b>                   | Equivalent of one working day per week during the active teaching semester; up to two days per week during institutional non-teaching periods | Days must be non-teaching days; cannot overlap with scheduled office hours, committee obligations, or examination periods |
| <b>Faculty on Sponsored Research Leave</b>                     | No compensated outside employment during SRL unless separately approved by the VPAA under FAC-008                                             | Fellowship and scholarship income not subject to this limit                                                               |
| <b>Faculty in administrative roles (Dean, Chair, Director)</b> | Maximum of one half-day per week; all consulting must not create a conflict with administrative decisions                                     | Higher scrutiny applies given decision-making authority of administrative roles                                           |

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|-----------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|-------------------------------------|------------------|------------|
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|                                                                                                                                                     | Policy Number      | FAC-010                             | Next Review date | 14/06/2029 |
|                                                                                                                                                     | Responsible Entity | Vic President for Academic Affairs  | Approved By      | President  |

Faculty members who wish to engage in outside activities beyond these limits may, in exceptional circumstances, request prior written approval from the VPAA.. Requests must demonstrate that the activities will not constitute a conflict of commitment and must include a plan for maintaining full AIU obligations. Approval is granted for a specific period not exceeding one academic year and must be renewed annually.

#### Article 4: Disclosure Obligations

Full and timely disclosure is the cornerstone of this policy. Faculty members are required to disclose all interests, activities, and relationships that meet the definitions and thresholds established in this policy. The failure to disclose a conflict, whether or not the underlying activity would itself have been permitted, is a violation of this policy.

##### 4.1 Disclosure Tiers

AIU operates a four-tier disclosure system:

| Disclosure Tier             | Trigger                                                                                                     | Form                                  | Deadline                                                                                                      |
|-----------------------------|-------------------------------------------------------------------------------------------------------------|---------------------------------------|---------------------------------------------------------------------------------------------------------------|
| <b>Annual</b>               | All faculty; all covered interests                                                                          | Annual COI Disclosure Form (ACOID)    | 30 September each year; within 30 days of appointment for new faculty                                         |
| <b>Event-triggered</b>      | New interest, activity, or relationship arising after the annual submission                                 | Update to ACOID (ACOID-Update)        | Within 30 days of the new interest arising, or immediately where a pending institutional decision is affected |
| <b>Transaction-specific</b> | Participation in a specific procurement, committee, editorial, or research decision where a conflict exists | Transaction Recusal Declaration (TRD) | Before deliberation begins on the specific matter                                                             |

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|-----------------------------------------------------------------------------------|--------------------|-------------------------------------|------------------|------------|
|  | Policy Main Title  | Faculty and Professional Staff      | Effective Date   | 14/06/2026 |
|                                                                                   | Policy Subject     | Faculty Conflict of Interest Policy | Last Review date |            |
|                                                                                   | Policy Number      | FAC-010                             | Next Review date | 14/06/2029 |
|                                                                                   | Responsible Entity | Vic President for Academic Affairs  | Approved By      | President  |

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|-----------------|-------------------------------------------------------------------------------------------------------|---------------------------------|-----------------------------------------------------------------------|
| <b>Research</b> | Submission of a grant application or research proposal where a financial interest may affect the work | Research COI Disclosure (RCOID) | At the time of grant submission; updated within 30 days of any change |
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All disclosure forms are completed through the Faculty Information System (FAS). Hard copies are retained by HR. Completed annual disclosures are reviewed by the COI Review Committee. The VPAA has access to all disclosure records. Disclosure records are retained as official University records for a minimum of seven years, in accordance with the University's records management and data protection requirements.

#### 4.2 Annual COI Disclosure

Every faculty member must complete and submit the Annual COI Disclosure Form (ACOID) through the FAS by 30 September each year. New faculty complete the ACOID within 30 days of appointment. The ACOID requires disclosure of:

- All outside employment, consulting engagements, advisory roles, and board memberships, whether compensated or uncompensated, undertaken since the last ACOID submission
- All Significant Financial Interests held by the faculty member or Immediate Family Members in any external entity that conducts business with AIU, recruits AIU graduates, or is affected by the faculty member's research or teaching
- All intellectual property interests, patents, copyrights, royalties, held in entities other than AIU
- Any family or personal relationship with a current AIU employee or student that could create a conflict in the faculty member's evaluation, supervision, or administrative responsibilities
- Any funded or sponsored research or consultancy where the faculty member or an Immediate Family Member holds a financial interest in the funding entity
- Any sponsored or reimbursed travel from an external entity, above KWD 500 in value, received in the preceding 12 months, in connection with the faculty member's professional activities
- Any gift, hospitality, or benefit received from a student, a student's family, or an entity seeking to influence the faculty member's professional decisions, above KWD 25 in value

Submitting an ACOID stating no conflicts is not equivalent to not submitting, the nil return is itself a required submission. A faculty member who submits a nil return and subsequently develops a disclosable interest must submit an ACOID-Update within 30 days.

#### 4.3 What Need Not Be Disclosed

The following categories of activity do not require disclosure unless they give rise to a conflict under another provision of this policy:

- Receipt of editorial fees from recognized academic journals in exchange for serving as an editor or reviewer, where the amount does not exceed KWD 500 per year

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|-----------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|-------------------------------------|------------------|------------|
| <br>AMERICAN INTERNATIONAL UNIVERSITY<br>الجامعة الأمريكية الدولية | Policy Main Title  | Faculty and Professional Staff      | Effective Date   | 14/06/2026 |
|                                                                                                                                                     | Policy Subject     | Faculty Conflict of Interest Policy | Last Review date |            |
|                                                                                                                                                     | Policy Number      | FAC-010                             | Next Review date | 14/06/2029 |
|                                                                                                                                                     | Responsible Entity | Vic President for Academic Affairs  | Approved By      | President  |

- Royalties from published scholarly works where AIU has no interest in the intellectual property
- Conference registration fee waivers and standard travel reimbursements received for presenting peer-reviewed research bearing AIU's affiliation
- Honoraria for academic lectures or keynote addresses at recognized professional or academic events, where the amount does not exceed KWD 500 per engagement
- Professional association membership dues and fees
- Receipt of a standard employee benefit from AIU

Where there is any uncertainty as to whether an activity or interest falls within an exempt category, the faculty member should contact the VPAA Office for guidance before proceeding on the assumption of exemption.

## Article 5: Professional Consultancy and Outside Employment

AIU recognizes and supports the value of faculty engagement in professional consultancy and outside employment. Such activities enhance disciplinary expertise, generate scholarly insights, connect AIU to the wider professional community, and support Kuwait's development objectives. They are permitted subject to the conditions in this article, the time limits in Article 3.2, and the disclosure requirements in Article 4.

### 5.1 Approval Requirement

All compensated outside employment and professional consultancy must be disclosed in the ACOID and require prior written VPAA approval. Approval is not required for uncompensated scholarly activities, such as peer review, academic conference participation, and professional association roles, unless those activities create a conflict under another provision of this policy.

### 5.2 Conditions for Approved Consultancy

All approved professional consultancy is subject to the following conditions:

- The consulting activity must align with the faculty member's area of scholarly or professional expertise. AIU does not permit outside employment in areas wholly unrelated to the faculty member's academic appointment unless specifically authorized by the VPAA.
- The consulting agreement must not require the disclosure, assignment, or transfer of AIU intellectual property or confidential information. Before signing any agreement that includes an intellectual property or confidentiality clause, the faculty member must obtain written VPAA approval and may be required to seek legal review.
- The consulting agreement must not make AIU a party to the agreement and must not imply AIU's endorsement of any product, service, or finding.
- AIU facilities, equipment, computational resources, student assistance, or personnel may not be used in connection with approved consultancy without separate, prior written approval from the VPAA and, where applicable, payment of an institutional use fee.

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|-----------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|-------------------------------------|------------------|------------|
| <br>AMERICAN INTERNATIONAL UNIVERSITY<br>الجامعة الأمريكية الدولية | Policy Main Title  | Faculty and Professional Staff      | Effective Date   | 14/06/2026 |
|                                                                                                                                                     | Policy Subject     | Faculty Conflict of Interest Policy | Last Review date |            |
|                                                                                                                                                     | Policy Number      | FAC-010                             | Next Review date | 14/06/2029 |
|                                                                                                                                                     | Responsible Entity | Vic President for Academic Affairs  | Approved By      | President  |

- e. The consulting activity must not involve working for, or providing services to, a direct commercial competitor of AIU.
- f. The identity of consultancy clients must be disclosed in the ACOID, except where a formal non-disclosure obligation exists — in which case the faculty member must disclose the nature of the engagement and the nature of the client's business even if the client's name cannot be disclosed.
- g. A faculty member engaged in consultancy may not recruit AIU students or research assistants to work on the consultancy project without prior VPAA approval and without ensuring that students are free to decline, to publish, and to complete their degrees without restriction.

### 5.3 Prohibited Outside Employment

The following forms of outside employment and consultancy are prohibited regardless of disclosure:

- Employment as a full-time academic or instructor at another university or educational institution while on a full-time AIU appointment
- Private tutoring of current AIU students, except within the AIU Tutoring Centre or an AIU-approved tutoring program, as governed by FAC-003
- Consulting for, or holding a management or board role in, an entity that is a direct competitor of AIU in the Kuwaiti higher education market
- Any outside activity that requires the faculty member to suppress, delay, or modify the publication of research results for commercial or personal benefit
- Any outside activity that would constitute a Conflict of Commitment under Article 3 and for which VPAA approval was not obtained

## Article 6: Research Conflicts of Interest

Research conducted at AIU must be free from financial or personal influences that could bias the design, conduct, reporting, or dissemination of findings. Where a faculty member holds a Significant Financial Interest in an entity that could be affected by the outcome of their research, that interest creates a research conflict of interest that must be managed to protect the integrity of the scholarly record and the welfare of any research participants. The existence of a disclosed research conflict shall not, in itself, prevent approval of a research project where appropriate management measures are in place.

### 6.1 Mandatory Research Disclosure

A faculty member must disclose any Significant Financial Interest that is reasonably related to their research activities at the time a grant application or research proposal is submitted to any internal or external funding source, and must update that disclosure within 30 days of any change. Research COI Disclosure forms are submitted through the FAS and reviewed by the COI Review Committee before research funded by or conducted through the disclosed relationship proceeds.

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|-----------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|-------------------------------------|------------------|------------|
| <br>AMERICAN INTERNATIONAL UNIVERSITY<br>الجامعة الأمريكية الدولية | Policy Main Title  | Faculty and Professional Staff      | Effective Date   | 14/06/2026 |
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|                                                                                                                                                     | Policy Number      | FAC-010                             | Next Review date | 14/06/2029 |
|                                                                                                                                                     | Responsible Entity | Vic President for Academic Affairs  | Approved By      | President  |

## 6.2 Co-investigators and Research Teams

A faculty member who has a disclosed research conflict of interest must disclose that conflict to all co-investigators, research assistants, trainees, and students working on or related research. Students and trainees working under the faculty member's supervision in a research program affected by a disclosed conflict must be informed of the conflict in writing and must be free to raise concerns through the Whistleblower portal under GOV-003 without fear of retaliation.

## 6.3 Research Management Plans

Where the COI Review Committee determines that a research conflict of interest can be managed, the Conflict Management Plan for research conflicts will typically include one or more of the following: independent monitoring of the research by a faculty member with no financial interest in the outcome; independent review of data analysis or statistical methods; disclosure in all publications, grant reports, and conference presentations arising from the research; enhanced human subjects review protocols where research involves participants; or removal of the conflicted faculty member from specific aspects of the research (such as data analysis or participant recruitment).

## Article 7: Intellectual Property and Information Confidentiality

Faculty members' intellectual contributions are an important dimension of AIU's scholarly mission. AIU's Intellectual Property Policy governs the ownership and commercialization of inventions and creative works developed using AIU resources. This policy addresses the conflict of interest dimensions of intellectual property, that is, situations where a faculty member's personal financial interest in commercializing IP may conflict with their research integrity obligations or with AIU's institutional interests.

### 7.1 Disclosure and Assignment of Inventions

All inventions, discoveries, data, software, creative works, and other intellectual property developed wholly or partly using AIU resources, time, or facilities are subject to AIU's Intellectual Property Policy. Faculty members must disclose all such potential IP to the VPAA and the Office of Research promptly upon creation, in accordance with that policy. The failure to disclose and assign IP that is owned by AIU is a prohibited conflict of interest under this policy and a breach of professional ethics under FAC-004.

### 7.2 Commercialization and Equity

Where a faculty member seeks to commercialize AIU-owned or jointly owned IP, for example, through a start-up, a licensing arrangement, or a technology transfer agreement, the financial interest arising from that commercialization constitutes a Significant Financial Interest that must be disclosed. All commercialization arrangements involving AIU IP must be reviewed and approved through the VPAA and

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|-----------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|-------------------------------------|------------------|------------|
| <br>AMERICAN INTERNATIONAL UNIVERSITY<br>الجامعة الأمريكية الدولية | Policy Main Title  | Faculty and Professional Staff      | Effective Date   | 14/06/2026 |
|                                                                                                                                                     | Policy Subject     | Faculty Conflict of Interest Policy | Last Review date |            |
|                                                                                                                                                     | Policy Number      | FAC-010                             | Next Review date | 14/06/2029 |
|                                                                                                                                                     | Responsible Entity | Vic President for Academic Affairs  | Approved By      | President  |

the Office of Research, with independent valuation of the commercial arrangement where the faculty member would hold equity or receive royalties.

### 7.3 Confidential Information

Faculty members must not disclose AIU confidential information, including strategic plans, financial data, student records, institutional research data, proprietary course materials, and other non-public institutional information, to external parties without prior written VPAA approval. The use of AIU confidential information for personal benefit, including in consulting activities, is a prohibited conflict of interest.

## Article 8: Family Relationships and Personal Conflicts

AIU recognizes that family relationships within a university community require particular care. Conflicts arising from family or close personal relationships can affect the objectivity of evaluation decisions, create the appearance of favoritism, and undermine trust in institutional processes. The following provisions govern these situations.

### 8.1 Teaching and Supervising Immediate Family Members

A faculty member may not teach, supervise, advise, or grade an Immediate Family Member who is enrolled at AIU. Where such a situation arises, for example, because an Immediate Family Member enrolls in a program where the faculty member regularly teaches, the faculty member must immediately disclose the situation to the Department Chair and VPAA. Alternative arrangements will be made, including reassignment of the course section or of the student's supervision. The student's academic rights must not be adversely affected by the required rearrangement.

### 8.2 Participating in Employment and Promotion Decisions

A faculty member may not participate in any hiring, appointment, promotion, contract renewal, salary, or performance evaluation decision that directly affects an Immediate Family Member or a person with whom the faculty member has a close personal romantic relationship. This prohibition applies to formal committee roles, informal advisory roles, and any situation where the faculty member's opinion could influence the outcome. Immediate disclosure to the Department Chair or Dean is required, and the faculty member must recuse from all involvement in the matter.

### 8.3 Reporting Relationships

A faculty member may not directly supervise or report to an Immediate Family Member. Where such a reporting relationship would arise, for example, through appointment to an administrative role, the matter must be disclosed immediately to the VPAA, who will arrange an alternative reporting structure or management arrangement.

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| <br>AMERICAN INTERNATIONAL UNIVERSITY<br>الجامعة الأمريكية الدولية | Policy Main Title  | Faculty and Professional Staff      | Effective Date   | 14/06/2026 |
|                                                                                                                                                     | Policy Subject     | Faculty Conflict of Interest Policy | Last Review date |            |
|                                                                                                                                                     | Policy Number      | FAC-010                             | Next Review date | 14/06/2029 |
|                                                                                                                                                     | Responsible Entity | Vic President for Academic Affairs  | Approved By      | President  |

#### 8.4 Gifts from Students

A faculty member may not solicit or accept gifts, gratuities, free services, entertainment, or other benefits from current students, former students where an ongoing evaluation relationship exists, or from the families of students. The receipt of modest, customary tokens of appreciation, such as a card, flowers, or a gift not exceeding KWD 25, does not require disclosure. Any gift above this value must be declined or, if declining is not practicable, surrendered to the University. The existence of a student gift above KWD 25 must be disclosed in the ACOID.

#### Article 9: COI Review Committee: Composition and Functions

The COI Review Committee is a standing committee appointed by the VPAA at the beginning of each academic year. It comprises the VPAA (Chair), two faculty members at the rank of Professor from different Schools, and the Director of HR. The Committee meets as needed to review annual ACOID submissions, assess disclosed conflicts, develop Conflict Management Plans, and investigate alleged violations.

The COI Review Committee has the following principal functions:

- Review all ACOID submissions and identify any disclosed interests or activities that constitute actual or potential conflicts of interest requiring assessment.
- Assess whether each identified conflict is prohibited, manageable, or exempt, applying the criteria in this policy.
- Develop and recommend Conflict Management Plans for manageable conflicts, in consultation with the affected faculty member.
- Review and recommend VPAA approval of consulting, outside employment, and research engagement requests that are referred to the Committee.
- Investigate alleged violations of this policy upon referral from the VPAA, the Dean, the Department Chair, or through the Whistleblower portal.
- Report annually to the VPAA on ACOID submission rates, disclosed conflicts by category, CMPs in operation, and violations investigated and resolved. This report is included in the Annual Institutional Effectiveness Report.

All COI Review Committee proceedings are strictly confidential. A Committee member who has a conflict of interest in relation to a case being reviewed must recuse from that case and notify the VPAA in writing. Committee members shall receive periodic guidance on the consistent application of this policy and current conflict of interest practices.

#### Article 10: Assessment and Management of Disclosed Conflicts

Upon receiving a disclosure that appears to constitute a conflict of interest, the COI Review Committee assesses the disclosure and determines one of three outcomes:

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|-----------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|-------------------------------------|------------------|------------|
| <br>AMERICAN INTERNATIONAL UNIVERSITY<br>الجامعة الأمريكية الدولية | Policy Main Title  | Faculty and Professional Staff      | Effective Date   | 14/06/2026 |
|                                                                                                                                                     | Policy Subject     | Faculty Conflict of Interest Policy | Last Review date |            |
|                                                                                                                                                     | Policy Number      | FAC-010                             | Next Review date | 14/06/2029 |
|                                                                                                                                                     | Responsible Entity | Vic President for Academic Affairs  | Approved By      | President  |

- g. No action required: The disclosed interest or activity does not constitute a conflict of interest under this policy. The faculty member is notified in writing and the disclosure is retained in the record.
- h. Conflict Management Plan: The disclosed conflict is real or perceived but can be managed without elimination. The Committee, in consultation with the faculty member, develops a Conflict Management Plan specifying: the nature of the conflict; the conditions under which the activity or interest may continue; any recusal obligations; monitoring arrangements; and reporting frequency. The CMP must be signed by the faculty member and the VPAA and is reviewed annually.
- i. Elimination required: The disclosed conflict is prohibited under Article 5.3 or Article 8.1, or the COI Review Committee determines that no management arrangement can adequately protect the institution's integrity. The faculty member must eliminate the conflict, by divesting the interest, terminating the outside activity, or withdrawing from the affected institutional role, within a period specified by the VPAA. Failure to eliminate a prohibited conflict within the specified period is a violation of this policy.

The VPAA makes the final determination on all conflict assessments, based on the Committee's recommendation. A faculty member who disagrees with a management or elimination determination may seek a review by the President within ten working days of written notification. The President's decision is final.

## Article 11: Violations, Investigation, and Sanctions

### 11.1 What Constitutes a Violation

A violation of this policy occurs when a faculty member:

- a. Fails to submit the Annual COI Disclosure Form by the required deadline
- b. Fails to file an event-triggered ACOID-Update within 30 days of a new disclosable interest arising
- c. Fails to recuse from a specific matter in which they have a disclosed or apparent conflict
- d. Makes a materially false or incomplete disclosure
- e. Engages in a prohibited outside activity (Article 5.3) or a prohibited family-related conflict (Article 8) without disclosure
- f. Fails to comply with a Conflict Management Plan within the specified timeframe
- g. Uses AIU resources, confidential information, or student labour for personal or outside activities without approval
- h. Retaliates against a colleague who disclosed a conflict of interest or reported a suspected violation in good faith

### 11.2 Investigation Process

- a. Alleged violations may be reported to the VPAA, the Dean, the Department Chair, or through the AIU Whistleblower portal under GOV-003. Anonymous reports are accepted and investigated to the extent the available evidence permits.

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|-----------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|-------------------------------------|------------------|------------|
| <br>AMERICAN INTERNATIONAL UNIVERSITY<br>الجامعة الأمريكية الدولية | Policy Main Title  | Faculty and Professional Staff      | Effective Date   | 14/06/2026 |
|                                                                                                                                                     | Policy Subject     | Faculty Conflict of Interest Policy | Last Review date |            |
|                                                                                                                                                     | Policy Number      | FAC-010                             | Next Review date | 14/06/2029 |
|                                                                                                                                                     | Responsible Entity | Vic President for Academic Affairs  | Approved By      | President  |

- b. Upon receiving a report of alleged violation, the VPAA refers the matter to the COI Review Committee within five working days. The Committee conducts an initial assessment to determine whether the allegation has a sufficient factual basis to warrant a formal investigation.
- c. If a formal investigation is warranted, the respondent (the faculty member whose conduct is under investigation) is notified in writing of the allegation and given an opportunity to provide a written response within ten working days.
- d. The Committee gathers evidence, reviews disclosure records, and may interview relevant parties. The Committee submits a formal investigation report to the VPAA within 30 working days of the investigation commencement date. The report includes a finding of fact and a recommended outcome.
- e. The VPAA reviews the report, consults with the President where the recommended sanction is severe, and issues a written decision. The decision is communicated to the respondent, the Dean, and HR.

### 11.3 Sanctions

Sanctions for violations are proportionate to the severity, nature, and circumstances of the violation, taking into account the seriousness of the breach, intent, previous history, and any corrective action taken by the faculty member, and may include any combination of the following:

- A formal written reprimand retained in the faculty member's personnel file
- Requirement to complete a mandatory ethics or conflict of interest training program
- Imposition of a Conflict Management Plan with enhanced monitoring requirements
- Withholding of merit increase or promotion consideration for a defined period
- Prohibition from serving on institutional committees for a defined period
- Reduction in workload privileges or consulting allowances
- Disgorgement of financial benefits received through the conflict
- Suspension without pay for a defined period
- Termination for cause under FAC-003

Sanctions are issued by the VPAA, with Presidential approval required for suspension or termination. A faculty member who believes a sanction is disproportionate or procedurally improper may appeal through the Faculty Grievance and Due Process (FAC-002) within ten working days of the written decision.

### Article 12: Relationship to Other Policies

This policy operates as part of an integrated policy framework. The following cross-references govern where conflicts or questions of interpretation arise:

- GOV-002 (Institutional Conflict of Interest Policy) governs Board of Trustees members, the President, and senior administrators. Where a faculty member also holds an administrative role, GOV-002 applies to their governance functions and this policy applies to their academic functions.
- FAC-003 (Faculty Employment Policy) governs outside employment approval requirements, including the requirement for prior VPAA written approval for any compensated outside activity.

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|-----------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|-------------------------------------|------------------|------------|
| <br>AMERICAN INTERNATIONAL UNIVERSITY<br>الجامعة الأمريكية الدولية | Policy Main Title  | Faculty and Professional Staff      | Effective Date   | 14/06/2026 |
|                                                                                                                                                     | Policy Subject     | Faculty Conflict of Interest Policy | Last Review date |            |
|                                                                                                                                                     | Policy Number      | FAC-010                             | Next Review date | 14/06/2029 |
|                                                                                                                                                     | Responsible Entity | Vic President for Academic Affairs  | Approved By      | President  |

FAC-003 and this policy are read together; this policy provides the conflict of interest overlay for the outside employment provisions in FAC-003.

- FAC-004 (Faculty Professional Ethics Policy) governs professional misconduct including research misconduct, harassment, plagiarism, and academic dishonesty. Conflicts of interest that rise to the level of professional misconduct, such as deliberate suppression of research findings for personal financial benefit, are governed by both this policy and FAC-004.
- FAC-008 (Faculty Professional Development Policy), Article 7 (Sponsored Research Leave), governs the prohibition on compensated outside activity during approved SRL.
- FAC-009 (Faculty Academic Promotion Policy) governs recusal requirements in the promotion process for cases involving Immediate Family Members or close collaborators.
- GOV-003 (Whistleblower Protection Policy) protects faculty members who report conflicts of interest or alleged violations of this policy in good faith.

## Procedures

The following procedures govern the administration of this policy.

### Annual Disclosure Cycle

- The VPAA Office issues a reminder notice to all faculty by 1 September each year, with instructions for completing the Annual COI Disclosure Form (ACOID) through the FAS.
- All faculty complete and submit the ACOID by 30 September. The FAS generates an automatic acknowledgement of receipt. Faculty who do not submit by the deadline receive a formal notice from HR by 5 October. Non-submission by 15 October is reported to the VPAA and is treated as a violation under Article 11.
- New faculty complete the ACOID within 30 days of their appointment start date. The Department Chair confirms completion as part of the onboarding checklist.
- The COI Review Committee reviews all ACOID submissions by 31 October. Submissions disclosing potential conflicts are flagged for assessment under Procedure 2. Submissions with no disclosable interests are acknowledged and filed. Overall submission rates and any compliance concerns are reported to the VPAA by 15 November.

### Conflict Assessment and Management Plan

- Upon identifying a potential conflict in an ACOID submission (or an event-triggered disclosure), the COI Review Committee notifies the faculty member in writing within five working days that the disclosure is under assessment.
- The Committee conducts its assessment within 20 working days, applying the criteria in Article 10. The Committee may request additional information from the faculty member. The faculty member must respond to information requests within five working days.
- The Committee submits its assessment and recommended outcome (no action / CMP / elimination) to the VPAA. The VPAA issues a written determination within ten working days of receiving the Committee's recommendation.

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|-----------------------------------------------------------------------------------------------------------------------------------------------------|--------------------|-------------------------------------|------------------|------------|
| <br>AMERICAN INTERNATIONAL UNIVERSITY<br>الجامعة الأمريكية الدولية | Policy Main Title  | Faculty and Professional Staff      | Effective Date   | 14/06/2026 |
|                                                                                                                                                     | Policy Subject     | Faculty Conflict of Interest Policy | Last Review date |            |
|                                                                                                                                                     | Policy Number      | FAC-010                             | Next Review date | 14/06/2029 |
|                                                                                                                                                     | Responsible Entity | Vic President for Academic Affairs  | Approved By      | President  |

- d. Where a Conflict Management Plan is required, the VPAA convenes a meeting with the faculty member and the relevant Dean to agree the CMP terms. The CMP is signed by the faculty member and VPAA and retained in the faculty member's personnel file.
- e. CMPs are reviewed annually at the same time as the ACOID submission cycle. Significant changes in the disclosed interest or activity require an immediate update to the CMP.

### Consulting and Outside Employment Approval

- a. A faculty member seeking to engage in compensated outside employment or professional consultancy submits a prior written request to the VPAA through the FAS, specifying: the nature of the activity; the identity of the external party; the estimated time commitment per week; the compensation or benefit structure; whether AIU IP or resources are involved; and whether the activity falls within the time limits in Article 3.2.
- b. The VPAA reviews the request and, where appropriate, refers it to the COI Review Committee for assessment. Decisions are issued in writing within 15 working days of the request being submitted.
- c. Approved consulting and outside employment activities are recorded in the faculty member's FAS profile. Approval is granted for the academic year in which it is sought and must be renewed annually. Changes to the terms of an approved activity, including significant increases in time commitment or compensation, require a new approval request.

### Annual COI Reporting

- a. The COI Review Committee produces an Annual COI Report by 15 December each year, covering: overall ACOID submission rates; number of disclosures by conflict category; number of assessments conducted; number and type of CMPs in operation; number of violations investigated; and sanction outcomes (anonymized).
- b. The Annual COI Report is submitted to the VPAA, shared in summary form with the Faculty Council, and included in the Annual Institutional Effectiveness Report submitted to the Board of Trustees.
- c. Aggregate, anonymized conflict of interest data is included in AIU's Accreditation agency self-study submissions as evidence of institutional integrity under relevant requirements.

The VPAA may amend operational timelines where institutional circumstances require without necessitating amendment of this policy.

**President Signature**

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