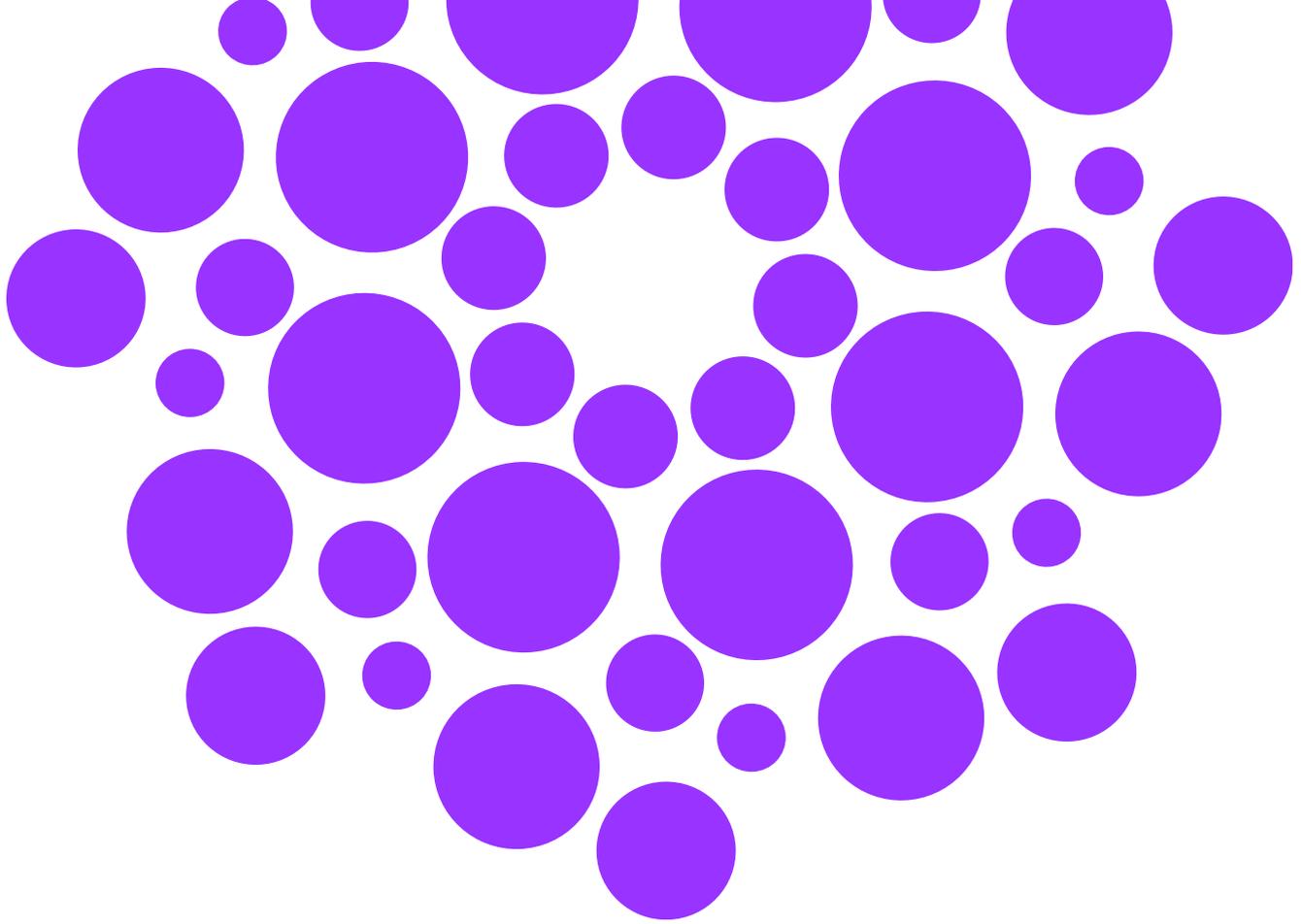


FAQS - Conflict of Interest Management Policy

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1. Definition and scope

1.1. What is a conflict of interest?

A conflict of interest is any situation in which a Collaborator has a personal or private interest, whether direct or indirect, that may influence their impartiality and objectivity in the performance of their duties at GIMM. This may involve advantages for themselves, family members, friends or entities with which they, or their family members or friends, have a relationship.

1.2. Why is the Conflict of Interest Policy necessary?

To ensure integrity, transparency and impartiality in decision-making, to protect the institution's reputation, and to comply with legal and regulatory requirements.

1.3. Who is covered?

All members of the governing bodies, employees, researchers, technicians, service providers, trainees, volunteers and any person with a temporary or permanent relationship with GIMM, regardless of the legal nature of that relationship (employment contract, grant, service provision, supply, collaboration, etc.).

1.4. Does the Policy also apply to members of the governing bodies, consultants and volunteers?

Yes. It applies to all individuals who have a functional or contractual relationship with GIMM, including members of the governing bodies and external collaborators.

2. Identification

2.1. How can I know if I have a potential conflict of interest?

If there is any relationship, advantage or interest that could, in abstract terms, affect your impartiality or create a perception of favouritism in your actions, the situation should be considered and declared.

2.2. Are financial interests the only situations that constitute a conflict?

No. Personal relationships, professional commitments, intellectual property and external activities may also give rise to conflicts of interest.

3. Examples

3.1. Personal or family relationships influencing decisions

Situations in which personal, family or friendship relationships influence, or may appear to influence, professional decisions.

Examples:

- Participating in the recruitment, evaluation or supervision of family members or friends;
- Awarding prizes, grants or roles to individuals with whom there is a close relationship;
- Making decisions that may unduly favour or disadvantage someone with personal ties.

3.2. Direct or indirect financial interests

Situations in which the Collaborator, close family members or related entities may obtain an economic or material benefit linked to their duties at GIMM.

Examples:

- Holding a financial interest in companies that provide goods or services to GIMM;
- Receiving payments, awards or incentives from partners, suppliers or funders;
- Using GIMM resources (equipment, time or information) for personal benefit or for the benefit of third parties.

3.3. Ownership of shares in start-ups, patents or other intellectual property rights

Situations in which the Collaborator holds patents, shares in start-ups or other intellectual property rights that may benefit from GIMM projects, contracts or scientific results.

Examples:

- Holding patents applicable to projects funded or carried out by GIMM;
- Participating in decisions on spin-offs in which the Collaborator has an interest;
- Manipulating scientific results to favour proprietary technology.

3.4. Acceptance of gifts or benefits

Situations in which a Collaborator receives, offers or accepts gifts, travel, invitations or hospitality that may affect the impartiality of their decisions.

Examples:

- Accepting invitations or trips paid for by suppliers, partners or funders;
- Receiving high-value gifts;
- Offering benefits with the aim of obtaining contractual or scientific advantages.

3.5. Consultancy or external activities

Situations in which a Collaborator provides consultancy, training or external services that may interfere with their responsibilities or compromise impartiality at GIMM.

Examples:

- Paid consultancy to entities that have contracts or collaborations with GIMM;
- Providing services to competing institutions or organisations;
- Participation in decision-making bodies of companies or other institutions without prior declaration.

3.6. Participation in decisions involving entities with which there is a prior relationship

Situations in which a Collaborator participates in decisions relating to entities or individuals with whom they maintain, or have recently maintained, a relevant professional, financial or personal relationship.

Examples:

- Evaluating projects submitted by an entity where the Collaborator worked within the last three years;
- Making decisions concerning partners or suppliers with whom there was direct collaboration;
- Participating in panels or committees involving institutions with which the Collaborator has ties;
- Having a family member working for a partner or supplier.

3.7. What if the conflict is only apparent and not actual?

It must still be declared, as the perception of a conflict may undermine trust and transparency.

4. Declaration and Communication

4.1. When and how should I declare a conflict of interest?

Todos All Collaborators must complete:

- Declaration of Acknowledgement and Acceptance of the Conflict of Interest Management Policy and Initial Declaration of the (Non-)Existence of Conflicts of Interest;
- Declaration of Absence of Conflict of Interest [Projects], to be submitted at the start of each project;

- **Declaration of Existence of Conflict of Interest**, whenever, during collaboration with the GIMM Foundation, a specific conflict situation is identified and/or there is a change in relevant circumstances. Specific guidance:
 - In cases of conflicts related to personal or family relationships influencing decisions, the Collaborator must refrain from participating in the relevant processes and report the situation to their line manager for assessment and referral to the Legal Department.
 - In cases of direct or indirect financial interests, the situation must be declared using the Declaration of Existence of Conflict of Interest (Annex III), and the Collaborator must refrain from participating in decisions involving the relevant entities.
 - In cases involving ownership of shares in start-ups, patents or other intellectual property rights, the situation must be immediately reported to the Legal Department (legal@gimm.pt) and declared in Annex III. It may be necessary to step aside from related decisions.
 - In cases involving acceptance of gifts or benefits, any offer of relevant value must be declared and assessed on a case-by-case basis. Benefits that may influence professional decisions must never be accepted.
 - In cases involving consultancy or external activities, all external activities must be previously authorised and declared, and the Collaborator must ensure that there is no conflict of time, resources or institutional loyalty.
 - In cases involving participation in decisions concerning entities with which there is a prior relationship, the situation must be reported before accepting participation in the process, and the Collaborator must refrain from voting or deciding if a conflict is confirmed.

4.2. To whom should I report the conflict?

To the line manager, who will forward the matter to the Legal Department. Members of the governing bodies must report to the Chair of the Board of Directors or the

Chair of the Board of Trustees. It is also possible to contact GIMM's Legal Department directly at: legal@gimm.pt.

4.3. Should I declare even minor interests or low-value gifts?

Gifts of symbolic value (e.g. promotional materials) are acceptable, provided they are occasional and proportionate. However, any situation that may affect the perception of impartiality must be declared.

4.4. What happens after a conflict is declared?

The Legal Department assesses the situation and defines appropriate mitigation measures (e.g. abstention, substitution, additional controls).

4.5. Who has access to the declared information?

The Legal Department and the competent bodies of GIMM, always ensuring confidentiality.

5. Management and Prevention

5.1. What happens if I fail to declare a conflict of interest??

Failure to declare may compromise institutional integrity and lead to disciplinary measures, in accordance with the Code of Conduct..

5.2. What should I do if I suspect another Collaborator has a conflict of interest?

Report the situation to the line manager or use the Irregularity Reporting Channel (ReportingChannel.GIMM@pt.ey.com).

5.3. Are reports handled confidentially?

Yes. Reports may be made confidentially and anonymously through the Irregularity Reporting Channel.

5.4. How often is the Conflict of Interest Policy reviewed?

Every two years, or whenever relevant changes occur.