

# EPFL POLICY on CONFLICTS OF INTEREST in PHS-FUNDED RESEARCH

*The Direction of the Ecole Polytechnique Fédérale de Lausanne hereby adopts the following:*

**INTRODUCTION** (terms in this Introduction that appear with an \* are defined in the Definition Section below; this Policy is hereinafter referred to as “the PHS-Policy”)

EPFL is committed to maintain the public's trust in the fact that research is independent and objective as well as conducted according to the highest ethical and scientific standards. Conflicts of interest in research (COI), especially financial conflicts of interest, may undermine this objective. It is therefore essential to identify possible conflicts of interest and to manage them appropriately.

This Policy applies to EPFL whenever one of its Investigators\* requests or receives research grants from US federal agencies who are components of the U.S Public Health Service (PHS)\*, including the National Institutes of Health (NIH). It applies to all such EPFL Investigators<sup>1</sup>, including individuals participating as sub-recipients of grants<sup>2</sup>.

The Policy may further apply to research funded by private funding entities that have decided to impose the same requirements as the PHS<sup>3</sup>.

EPFL Investigators who are subject to this Policy still have to comply with all other EPFL applicable rules regarding conflicts of interest, in particular the “Directives concerning the management of conflicts of interest within the context of activities or public duties engaged in outside the working sphere”, LEX 4.1.1. In accordance with its article 12, employees who participate in the funding and the development of a company are required to comply with the institutional policy by signing a personal undertaking<sup>4</sup>.

This policy informs Investigators about situations that generate COI. It provides mechanisms for the EPFL and for Investigators to address these COI. It asks that Investigators conduct their affairs so as to avoid or minimize COI.

Investigators must behave so as to defend and advance the interests of EPFL as well as the interests of the public in unbiased research, as opposed to their own financial interests.

Every EPFL Investigator who intends to request or receive PHS funding must become familiar with this policy and abide by its rules. If a question regarding this policy arises (e.g., its scope, its obligations), the Investigator should always discuss the situation with the Institutional Official\* (“in doubt, discuss”).

## **SOURCES:**

Ordonnance sur le Corps professoral des EPF (Ordinance on the EPF faculty) (RS 172.220.113.40), in particular its Art. 6

Ordonnance du personnel des EPF (Ordinance on EPF staff) (O. pers.) (RS 172.220.113), in particular its Articles 53, 56, 56a and 56b

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<sup>1</sup> Only the following types of projects are not covered:

- NIH Phase I Small Business Innovative Research (SBIR); or
- NIH Small Business Technology Transfer (STTR).

<sup>2</sup> Participation as subgrantee, subcontractor or subrecipient in a PHS project is within this Policy, provided that the individual can be deemed an Investigator.

<sup>3</sup> These include, but are not limited to, the Juvenile Diabetes Research Foundation (JDRF) and Susan G. Komen for the Cure.

<sup>4</sup> [http://tto.epfl.ch/files/content/sites/polylex/files/recueil\\_pdf/ENG/4.1.1\\_engagement\\_personnel\\_employe\\_an.pdf](http://tto.epfl.ch/files/content/sites/polylex/files/recueil_pdf/ENG/4.1.1_engagement_personnel_employe_an.pdf)

This Policy is a requirement under the United States Code of Federal Regulations (42 CFR 50 Subpart F and 45 CFR 94)<sup>5</sup>.

The text of this Policy was inspired from FDP Model Financial Conflict of Interest Policy of August 2012 and from the NIH-Frequently Asked Questions document.

To make reading easier, quotations marks have not been used, while footnotes have been used to convey information held to be of a more technical nature.

## **DEFINITIONS**

### **Clinical Research**

Any PHS-sponsored research study that involves interaction with human subjects and the concurrent investigative use of drugs, biologics, devices or medical or other clinical procedures, such as surgery.

### **Institutional Official**

The Dean of Research is the EPFL Institutional Official. He/she advises on conflict of interest matters, solicits, collects, processes, reviews and retains disclosures of significant financial interests, and takes corresponding decisions, subject to the authority of the EPFL Secretary General, or the President of EPFL in the case of a Professor.

### **Disclosure Form**

The form filled by the Investigator and submitted to the Institutional Official, available in Appendix 2 and on the Research Office's website (<http://research-office.epfl.ch>). See further Article 1.

### **Family**

Any member of the Investigator's immediate family, specifically, any dependent children and spouse or registered partner.

### **Financial Interest**

Anything of *monetary value*, received or held by an Investigator (including Family<sup>6</sup>), whether or not this value is readily ascertainable.

Provided that it could reasonably appear related to the Investigator's Institutional Responsibilities<sup>7</sup>, such Financial Interest *includes*:

- *salary* or other payments for services (e.g., consulting fees, honoraria, or paid authorships for other than scholarly works);
- *equity* interests (e.g., stocks, stock options, warrants, or other ownership interests), whether or not in a publicly listed company;
- *intellectual property* rights and related interests (e.g., patents, trademarks, service marks, and copyrights), provided that related income (e.g., royalties) has been actually received;
- reimbursed or sponsored *Travel* received by the Investigator<sup>8</sup>.

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<sup>5</sup> Should there be any contradiction between this Policy and the CFR requirements, the latter prevail.

<sup>6</sup> Please note: Items of value received by Family are within the scope of this Policy only if they can reasonably appear to be related to the Investigator's Institutional Responsibilities.

<sup>7</sup> Observation: The reasonable relation to the Investigator's Institutional Responsibilities is actually part of the definition of Significant Financial Interests.

<sup>8</sup> Please note: This includes travel that is paid on behalf of the Investigator as well as travel that is reimbursed, even if the exact monetary value is not readily available.

Exception: It excludes travel reimbursed or sponsored by U.S. Federal, state or local governmental agencies, U.S. institutions of higher education, research institutes affiliated with institutions of higher education, academic teaching hospitals, and medical centers. Non-US institutions do not benefit from this exception.

Appendix 1 contains a list of items which are *not* viewed as Financial Interest.

### **Financial Conflict of Interest**

A Significant Financial Interest *if*, as reasonably determined by the Institutional Official, it *could directly and significantly affect the design, conduct or reporting* of PHS-funded research.

### **Institutional Responsibilities**

The Investigator's *professional responsibilities associated with his or her EPFL function* (e.g., research, teaching, clinical activities, consultation, administration, and committee service).

### **Investigators**

All EPFL individuals *responsible for the design, conduct, or reporting* of PHS sponsored research, or proposals for such funding<sup>9</sup>.

### **Management Plan**

The plan decided by the Institutional Official and agreed by the Investigator to manage Significant Financial Interest. See further Article 2.

### **Mitigation Report**

The report prepared by the Institutional Official following discovery of a violation of the Policy which has biased the research. See further Article 6. b).

### **Public Health Service or PHS**

The Public Health Service of the U.S. Department of Health and Human Services, and any components of the PHS to which the authority of the PHS may be delegated, most notably the NIH<sup>10</sup>.

### **Research**

A systematic investigation, study, or experiment designed to contribute to generalizable knowledge relating broadly to public health, including behavioral and social-sciences research<sup>11</sup>. Only PHS-funded research is here concerned.

### **Retrospective Review**

The report prepared by the Institutional Official following discovery of a violation of the Policy. See further Article 6. b).

### **Significant Financial Interest**

A Financial Interest that is, at the same time:

- that of an Investigator (or Family);
- related to his or her Institutional Responsibilities;
- related to PHS-funded Research, most notably when it is of kind:
- that could be affected by this research; *or*
- that is in an entity whose financial interest could be affected by this research.

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<sup>9</sup> Please note: This definition is not limited to those titled or budgeted as principal investigator or co-investigator on a particular proposal. It may include postdoctoral associates, senior scientists, graduate students, consultants, unpaid collaborators. A PHS research project may have several Investigators.

<sup>10</sup> Please note: The components of the PHS include, but are not limited to, the Administration for Children and Families, Administration on Aging, Agency for Healthcare Research and Quality, Agency for Toxic Substances and Disease Registry, Centers for Disease Control and Prevention, Federal Occupational Health, Food and Drug Administration, Health Resources and Services Administration, Indian Health Service, National Institutes of Health, and Substance Abuse and Mental Health Services Administration.

<sup>11</sup> Please note: The term encompasses basic and applied research (e.g., a published article, book or book chapter) and product development (e.g., a diagnostic test or drug).

- and that reaches a threshold as defined in Appendix 1.

Only Significant Financial Interests need to be disclosed by the Investigators.

### **Travel**

Any reimbursed *or* sponsored travel in favor of the Investigator. Sponsored travel is paid on behalf of the Investigator, but not directly to him or her.

### **Article 1 DUTY OF INVESTIGATORS TO DISCLOSE THEIR SIGNIFICANT FINANCIAL INTERESTS**

All Investigators must disclose to the Institutional Official their Significant Financial Interests (as per the definition above and Appendix 1).

They must provide information necessary to determine whether these actually qualify as Significant Financial Interest and whether the latter could give rise to a Financial Conflict of Interest.

This disclosure must occur, for all Investigators who intend to request or receive PHS funding<sup>12</sup>:

- every year, at the latest by March 1<sup>st</sup>(<sup>13</sup>); and
- within 30 days *after* taking function (e.g., being appointed) at EPFL; and
- at least 30 days *before* applying for PHS funding or sub-funding<sup>14</sup>; and
- within 30 days *after* discovering *or* acquiring a new Significant Financial Interest<sup>15</sup>.

Disclosure must be done using the Disclosure Form provided in Appendix 2<sup>16</sup>. The Investigator may find it helpful to attach additional information to this form.

It is the responsibility of the Investigator who intends to request or receive PHS funding to announce himself/herself to the Institutional Official, and to comply actively with his/her duty to disclose. Principal Investigators in charge of a PHS-funded project make sure that all Investigators under their supervision comply with their duties.

Investigators are encouraged to ask the Institutional Official all questions that may help them satisfy their obligations under this Policy.

The Institutional Official may contact the Investigator to obtain further information about the content of his or her disclosures.

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<sup>12</sup> Please note: shorter deadlines may apply when the EPFL Investigator is participating in a sub-project. The main awardee will then specify when the Disclosure Form must be sent.

<sup>13</sup> Please note: this obligation ceases once the PHS funded project is fully completed.

<sup>14</sup> Please note: The Institution will not submit a research proposal *until* all Investigators for this project have submitted their disclosure forms.

Also funds should not be expended before the Institutional Official has made its initial FCOI report to the PHS.

<sup>15</sup> Please note: A financial interest may also be *new* because it now exceeds a threshold as defined by Appendix 1.

Please note: A *new* financial interest may arise because of marriage or inheritance.

<sup>16</sup> The file is available on the Research Office's website:  
<http://research-office.epfl.ch>

## Article 2 DUTIES OF THE INSTITUTIONAL OFFICIAL

- a) The Institutional Official will contact every EPFL person appearing to assume main responsibility for an (ongoing or future) PHS project (or subproject) so as to identify who bears the duties of an Investigator (according to this Policy)<sup>17</sup>.
- b) The Institutional Official will review each Disclosure Form to determine<sup>18</sup>:
  - whether there is actually a Significant Financial Interest as per Appendix 1; and
  - whether it constitutes a Financial Conflict of Interest.

In that regard, he or she may seek the assistance or participation of the affected Investigator as well as of EPFL-internal or external experts. Before the Institutional Official has reached a determination, the Investigator may be asked to postpone participation in the PHS Research.

- c) If a Financial Conflict of Interest is detected, the Institutional Official will take all necessary actions to manage it. Such actions may include the reduction or the elimination of the conflict<sup>19</sup>. Particularly strict measures may be imposed if the PHS Research at issue is a Clinical Research.

The Institutional Official will prepare a written Management Plan describing all such actions<sup>20</sup>.

The affected Investigator will be associated to this process. He or she will cooperate in good faith. The final Plan must be signed by the Investigator before the start of any PHS funded Research.

- d) The Institutional Official will verify that the management plan is duly followed. At least once a year, he or she will review the Management Plan and decide whether it is still appropriate.
- e) He or she may take any other measures necessary to enforce this Policy.

In particular, he or she shall impose, by contract, stricter deadlines when the EPFL or an Investigator, acting as main PHS awardee, intends to delegate certain research responsibilities to an external subrecipient. The contract obligations will ensure that the sub-recipient Investigator fully complies with PHS requirements and that, as a result, EPFL and EPFL Investigators are able to comply with these requirements. The Parties may choose by written agreement whether the non-EPFL subrecipient will abide with its own (PHS compliant) policies or with those of EPFL.

- f) The Institutional Official will raise awareness among the EPFL community, and most specifically among Investigators, about the importance of sound management of conflicts of interest.
- g) The Institutional Official retains all disclosure forms and management plans during 3 years starting with the submission of the final expenditure report to the PHS (or to the prime PHS awardee). Longer retention period may be necessary in certain cases<sup>21</sup>.

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<sup>17</sup> The Institutional Official will usually start by contacting the person named as Principal Investigator in the PHS application.

<sup>18</sup> The Institutional Official must reach his or her determination before any PHS funds are expended. It must do the same within *60 days* of receiving new Disclosure Forms.

<sup>19</sup> Management measures may include public disclosure of the conflict, disclosure to research participants, appointment of an independent monitor, modification of the research plan, change of staff responsibilities.

<sup>20</sup> The Institutional Official must establish (at least an interim) Management Plan within *60 days* of receiving the Disclosure Form.

The Management Plan must include, among other aspects, the role and duties of the conflict Investigator, the requirements imposed to him or her, how these requirements can ensure objectivity, how monitoring will be implemented.

<sup>21</sup> For example, records must be kept until all litigation, claims or audit findings involving the records have been resolved and final action taken.

- h) The Institutional Official may delegate, under his or her supervision, certain tasks to EPFL employees, provided internal guidelines specify the extent of the delegation.

### **Article 3 REPORTING DUTIES OF THE INSTITUTIONAL OFFICIAL**

The Institutional Official will report<sup>22</sup> directly to the PHS:

- All Financial Conflicts of Interest (so-called "FCOI report")<sup>23</sup>; *and*
- cases of Investigator's non-compliance with this Policy, particularly Mitigation Reports (see Article 6. b) below)<sup>24</sup>.

The first FCOI report is due before PHS funds are expended; therefore, reports are due at least annually<sup>25</sup>.

He or she will report Financial Conflict of Interest to the *main awardee* when the EPFL (sub)Investigator only participates as sub-recipient<sup>26</sup>.

### **Article 4 PUBLIC TRANSPARENCY**

PHS Regulations require that significant information provided in the Disclosure Forms be made public. Hence, the Institutional Official will provide information about an Investigator's<sup>27</sup> still on-going Financial Conflict of Interest to anyone making such a request, subject to Swiss law<sup>28</sup>.

The affected Investigator will be informed before such information is communicated to a member of the public.

### **Article 5 TRAINING OF INVESTIGATORS**

Investigators must follow training courses on the responsible conduct of research and financial conflicts of interest.

The first course must be followed by Investigators who intend to request or receive PHS funding within 30 days of assuming Investigator function with EPFL and prior to engaging in research related to any PHS-funded grant<sup>29</sup>.

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<sup>22</sup> Reports must include the project number, the name of the affected Investigator, the name of the entity involved in the Financial Conflict of Interest, the nature of the Financial Interest, the value of the Financial Interest (in dollar ranges), a description of the Conflict, a summary of the Management Plan. A copy of the Management Plan needs not be provided.

<sup>23</sup> No report is due if there is no Financial Conflict of Interest (or if it has been eliminated before PHS funds are expended). An updated annual report is however due if an existing Financial Conflict of Interest has now been eliminated.

<sup>24</sup> PHS must be notified promptly if previously unidentified Financial Conflict of Interest could have biased the research.

<sup>25</sup> *Annual* FCOI reports are due 60 days following receipt of the Disclosure Form, to coincide with the point in time when EPFL must submit to the NIH its annual progress report.

*Additional* FCOI reports are due when the Institutional Official discovers that a Significant Financial Interest was not disclosed in time or that a Financial Conflict of Interest was not recognized in time. The same applies when a new Investigator begins participation in a PHS-funded project. The deadline is 60 days.

All reports to the NIH are submitted electronically (eRA Commons FCOI Module)).

<sup>26</sup> Please note: Such reports shall be made to the prime awardee prior to the expenditure of any funds and within 60 days of any subsequently identified financial conflict of interest such that the prime awardee may fulfill their reporting obligations to the PHS.

<sup>27</sup> Information about sub-recipient Investigators must also be made public.

<sup>28</sup> The Investigator and/or the relevant family member(s) must have given consent to the disclosure. In this case, the Institutional Official must respond to a request made by a member of the public within 5 business days (date of email or date on the postal envelope). The response must include the Investigator's name, his or her title and role in the research, the name of the non-EPFL entity concerned, the nature of the Significant Financial Interest, the approximate value of the interest. The information must remain available for at least 3 years from the date that it was most recently updated.

<sup>29</sup> Subrecipient Investigators must satisfy the same training requirements.

Hereafter, the courses must be attended at least every 4 years.

Additional courses may be imposed if this Policy or underlying PHS regulations are changed or if the Investigator has breached this Policy. The Institutional Official will advise accordingly.

The necessary course is an on-line training program provided by CITI<sup>30</sup> (completion of the program is confirmed by an on-line certificate, which must be printed, signed and sent to the Institutional Official).

## Article 6 VIOLATIONS

### a) Consequences for the Investigator

If the Investigator fails to comply with this Policy or measures imposed by the Institutional Official<sup>31</sup>, he or she will:

- Face disciplinary actions according to Swiss law and EPFL rules; and
- provided that the PHS project is Clinical Research, be obliged to systematically reveal his or her financial conflicts of interest in each public presentation of the results of the affected PHS project<sup>32</sup>; moreover, he or she will have to request an addendum to any previously published presentations.

### b) Obligations of the Institutional Official

The Institutional Official will prepare a reasoned memorandum describing the suspected violation. The concerned Investigator will be heard before the final memorandum is adopted. He or she may appeal to the EPFL Secretary General, or the President of EPFL in the case of a Professor, the findings of the final memorandum.

If the Institutional Official determines that a Significant Financial Interest was not identified or duly managed<sup>33</sup>, he or she will review the Investigator's PHS Research activities<sup>34</sup>. In particular, he or she will determine if there was a Financial Conflict of Interest. If yes, he or she will conduct a *Retrospective Review* to assess whether the Research was *biased* in its design, conduct or reporting. This Retrospective Review shall be duly documented<sup>35</sup>.

If bias is found, the Institutional Official will promptly notify the PHS and submit a *Mitigation Report* (in accordance with PHS regulations). This Report will identify elements documented in the Retrospective Review, will describe the impact of the bias on the Research and propose actions to eliminate or mitigate the effect of the bias. Thereafter, EPFL will submit Financial Conflict of Interest Reports annually.

Moreover, the Institutional official will update any previously submitted report to the PHS or the prime PHS-awardee, specifying the actions that will be taken to manage the Financial Conflict of Interest going forward.

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<sup>30</sup> <http://www.citiprogram.org>

CITI stands for Collaborative Institutional Training Initiative.

<sup>31</sup> Such a clinical trial must have as purpose to evaluate the safety or effectiveness of a drug, medical device, or treatment.

<sup>32</sup> Please note: presentations include articles, manuscripts, oral presentations, classroom material.

<sup>33</sup> Please note: This includes failure to disclose a Significant Financial Interest that is determined to be a Financial Conflict of Interest, or failure by an Investigator to materially comply with a management plan for a Financial Conflict of Interest

<sup>34</sup> The deadline for this review is 60 days; within that period, it may be necessary to adopt an interim management plan.

<sup>35</sup> Documentation shall include the project number, project title, PI, name of Investigator with the Financial Conflict of Interest, name of the entity with which the Investigator has the Financial Conflict of Interest, reason(s) for the retrospective review, detailed methodology used for the retrospective review, and findings and conclusions of the review.

The deadline for completion of the Retrospective Report is 120 days following awareness of the violation.

**Article 7 FINAL PROVISIONS**

This policy enters into force on February 17<sup>th</sup>, 2014, version 1.0, status as at February 17<sup>th</sup>, 2014. It will be posted on the EPFL (public) website Polylex.

On behalf of the EPFL Direction:

Patrick Aebischer  
President

Susan Killias  
General Counsel

Appendix 1: Definition and Thresholds for Significant Financial Interest  
Appendix 2: Significant Financial Interest Disclosure Form, EPFL

**APPENDIX 1:  
DEFINITION AND THRESHOLDS FOR SIGNIFICANT FINANCIAL INTEREST**

There is Significant Financial Interest whenever it reaches one (or more) of the following threshold:

- a) from *each outside entity*, the Investigator (or his/her Family) has received items of value (e.g., salary, consulting fees, honoraria, paid authorship, Travel, IP-royalties or other IP-payments), provided that their *aggregate* value exceeds US\$ 5'000;
- b) The Investigator (or his/her Family) has held an *equity interest in a non-public company*, regardless of the value of such interest;
- c) The Investigator (or his/her Family) has held an *equity interest in a publicly-traded company* provided that its value exceeds US\$ 5'000<sup>36</sup>.
- d) the addition of any of the items above provided that their aggregate value, as received from the *same* outside entity, exceeds US\$ 5'000.

The relevant period to apply the above-mentioned criteria is *the 12 months preceding* the Investigator's due date for submission of the disclosure form.

Are not to be included:

- salary or other remuneration if received *directly from EPFL*;
- royalties or any other IP payment if received *directly from EPFL*<sup>37</sup>;
- income from the authorship of academic or scholarly works;
- income from seminars, lectures, or teaching engagements from U.S. Federal, state or local governmental agencies; U.S. institutions of higher education; their research institutes, academic teaching hospitals, and medical centers<sup>38</sup>;
- Travel reimbursed or sponsored by U.S. Federal, state or local governmental agencies; U.S. institutions of higher education; their research institutes, academic teaching hospitals, and medical centers;
- equity interests or income from investment vehicles, such as mutual funds and retirement accounts, provided that the Investigator does *not* directly control the investment decisions made in these vehicles.
- Items of value received by Family if they *cannot* reasonably appear to be related to the Investigator's Institutional Responsibilities.
- Financial Conflicts of Interest which have been *fully eliminated before* the expenditure of any PHS fund.
- Financial Conflicts of Interest occurring *after* the (full) end of PHS-funded project.

As a reminder, the Significant Financial Interest must be at the same time:

- that of an Investigator (or Family);
- related to his or her Institutional Responsibilities;
- related to PHS-funded Research, most notably when it is of kind:
  - that could be affected by this research; *or*
  - that is in an entity whose financial interest could be affected by this research.

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<sup>36</sup> Please note: the dollar amount should be calculated based on fair market value, normally through reference to public prices.

<sup>37</sup> Please note: the Investigator must be employed or appointed by EPFL to benefit from this exception.

<sup>38</sup> Only U.S. centers (institutes of higher education, research institutions, academic teaching hospitals, medical centers) are exempted.

APPENDIX 2:

**Significant Financial Interest Disclosure Form, EPFL**

Submitted pursuant to the requirements of the EPFL POLICY on CONFLICTS OF INTEREST in PHS-FUNDED RESEARCH.

**Please sign and send this report to: [research.office@epfl.ch](mailto:research.office@epfl.ch)**

**Investigator Name:** Cliquez ici pour taper du texte.

EPFL Unit: Cliquez ici pour taper du texte.

Email: Cliquez ici pour taper du texte.

I participate in the following PHS-sponsored (including NIH) research projects: Cliquez ici pour taper du texte. (please list project titles and/or GrantsDB reference numbers)

I intend to participate in a PHS-sponsored research project

This is my:

annual disclosure (year Cliquez ici pour taper du texte.)

initial disclosure

my disclosure following discovery of a new Financial Interest

another type of disclosure, i.e.: Cliquez ici pour taper du texte.

**Disclosure of Significant Financial Interests**

For additional guidance on the definition of a Significant Financial Interest, see Appendix 1.

*Family members for the purpose of this report are your dependent children and your spouse/registered partner.*

Yes	No	
<input type="checkbox"/>	<input type="checkbox"/>	Compensation (including travel reimbursement or sponsorship). Have you or a member of your Family received compensation (>\$5,000 when aggregated) from an entity, not listed in the exclusions, for activities such as consulting, expert witness, advisory board membership, and the like? If yes, furnish detailed information on additional page.
<input type="checkbox"/>	<input type="checkbox"/>	Equity. Do you or a member of your Family own stock or hold stock options (broadly defined, including derivatives) with a publicly-traded (value when aggregated is >\$5,000) or a non-publicly traded (any value) entity? If yes, furnish detailed information on additional page.
<input type="checkbox"/>	<input type="checkbox"/>	Role. Do you or a member of your Family serve as a director, trustee, officer or other key employee in a corporation, partnership, business, or other entity outside of EPFL? If yes, furnish detailed information on additional page.
<input type="checkbox"/>	<input type="checkbox"/>	Intellectual Property. Do you or a member of your Family have rights to and/or receive royalties from intellectual property (including, patents, copyrights and trademarks but excluding academic or scholarly works) licensed to and/or owned by a for-profit entity? Do NOT include intellectual property owned or managed by the EPFL. If yes, furnish detailed information on additional page.

**Training**

Yes	No	
<input type="checkbox"/>	<input type="checkbox"/>	Have you satisfied your periodic training obligations?  <b>When:</b> Cliquez ici pour entrer une date.
<input type="checkbox"/>	<input type="checkbox"/>	Have you already sent your training certificates? (if not please attach)

## Certification

I have read and understand the EPFL conflicts of interest policy and procedures and have accurately completed this report to the best of knowledge and belief, after having taken all necessary advice from the EPFL Institutional Official. If required, I will comply with any conditions or restrictions imposed by EPFL to manage any real or perceived conflicts. Should my outside financial or managerial interests, or those of my immediate family, change in a way that results in different answers to any of the questions asked in this report, I agree to submit a revision.

I am aware that information contained herein may have - as a condition of participating in PHS-funded research - to be transferred to U.S. authorities or to members of the public and I explicitly consent to such disclosure.

Date : [Cliquez ici pour entrer une date.](#)

**Investigator Name:** [Cliquez ici pour taper du texte.](#)

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(Signature)

List of attached documents (if any): [Cliquez ici pour taper du texte.](#)

**Thank you very much!**

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## Family members

In the event that a Significant Financial Interest of a Family member (spouse, registered partner or dependent child) has been disclosed in this form, the Family member or his/her legal representative is aware that information contained herein may have - as a condition of participating in PHS-funded research - to be transferred to U.S. authorities or to members of the public, and hereby explicitly consents to such disclosure.

Date: [Cliquez ici pour entrer une date.](#)

Name of Family member: [Cliquez ici pour taper du texte.](#)

Name of legal representative(s) (if applicable): [Cliquez ici pour taper du texte.](#)

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(Signature)

Date: [Cliquez ici pour entrer une date.](#)

Name of Family member: [Cliquez ici pour taper du texte.](#)

Name of legal representative(s) (if applicable): [Cliquez ici pour taper du texte.](#)

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(Signature)

### Significant Financial Interest Report (Details)

**Please complete a separate sheet for yourself and each Family member** (spouse, registered partner and dependent children, if applicable), **and for each External Entity** (non-EPFL entity). If there is no Significant Financial Interest to report, filling this page is not necessary.

Reporting for

Self

Spouse/Registered partner or dependent child:

name: Cliquez ici pour taper du texte.

relationship: Cliquez ici pour taper du texte.

Name of External Entity: Cliquez ici pour taper du texte.

Address of External Entity: Cliquez ici pour taper du texte.

Type of external relationship: (check all that apply)

	Type	Amount
<input type="checkbox"/>	Consultant	Cliquez ici pour taper du texte.
<input type="checkbox"/>	Speaker	Cliquez ici pour taper du texte.
<input type="checkbox"/>	Advisory Board or Committee	Cliquez ici pour taper du texte.
<input type="checkbox"/>	Equity Holdings	Cliquez ici pour taper du texte.
<input type="checkbox"/>	Governing Board or Officer	Cliquez ici pour taper du texte.
<input type="checkbox"/>	Intellectual Property Rights	Cliquez ici pour taper du texte.
<input type="checkbox"/>	Royalty Income from Intellectual Property Rights	Cliquez ici pour taper du texte.
<input type="checkbox"/>	If travel paid by entity: Destination/Duration: Cliquez ici pour taper du texte. Purpose of travel: Cliquez ici pour taper du texte.	(if over \$5,000): Cliquez ici pour taper du texte.
<input type="checkbox"/>	Other (describe below): Cliquez ici pour taper du texte.	

Comments or explanatory information: Cliquez ici pour taper du texte.