



Third Party Code guidance: Conflict of Interest

Introduction

In this new era of epidemic and pandemic risk, CEPI’s mission—to accelerate the development of vaccines and other biologic countermeasures against epidemic and pandemic threats so they can be accessible to all people in need—is more important than ever before. Our ambitious goal, to develop vaccines against a novel viral threat in as little as 100 days, could give the world a fighting shot at stopping the next pandemic in its tracks.

CEPI requires all Third Parties (including (i) individuals, organisations and companies that provide or are intending to provide goods or services, (ii) Awardees receiving funding, and (iii) other business partners of CEPI to abide by CEPI’s Third Party Code, which can be found on www.cepi.net.

Recognising CEPI engages with organisations across different jurisdictions, each subject to distinct legislation and at varying maturity levels of their compliance frameworks, CEPI has produced some guidance which may be helpful for Third Parties. This guidance is not intended to replace the need for independent review and assessment by our Third Parties of their own compliance framework and their adequacy. This guidance is not legal advice.



Why is it important to appropriately manage conflicts of interest?

- Managing conflicts of interest ensures that decisions on CEPI-funded projects are made based on merit and in the best interest of the project and use of project results, rather than being influenced by other interests. This helps maintain the trust and integrity of our organizations.
- Unmanaged conflicts of interest can lead to ethical and legal challenges, severely damaging both CEPI and the Third Party's reputation . This can lead to a loss of business, decreased employee morale, and a tarnished public image.
- Encouraging early disclosure and fostering a culture of transparency helps prevent conflicts of interests from compromising professional judgment. This proactive approach can avert potential issues from escalating into significant problems.

By addressing conflicts of interest promptly and effectively, organizations can build a more ethical, fair, and trustworthy environment



What is a conflict of interest?

Conflict of Interest: when an individual's interests (or those of a family member) influence, have the potential to, or could be perceived to influence, the ability to act in the best objective interest of CEPI, a CEPI-funded project, or impact on the intended project results created as part of a CEPI-funded project.

Conflicts of Interests may occur if individuals, or their family members, have (for example):

- Financial interest: i.e. where an individual receives a financial benefit from arrangement, or project, or has a close association with someone with a financial interest (such as a spouse or partner)
- Personal interests: i.e. where an individual or family member may receive other benefits, such as increasing professional reputation or standing.
- Organisational interests: i.e. where an individual may feel loyalty towards an organisation or individual for other reasons, such as previous work history or as a Board Member or advisory position at another organisation.

What are CEPI's requirements?

As set out in the Third Party Code, CEPI requires our Third Parties to:

- Have systems in place to ensure the disclosure, review and management of Conflicts of Interest;
- Act to reduce, mitigate or eliminate any actual, potential or perceived Conflict of Interest that are identified in connection with their CEPI agreements; and
- Disclose to CEPI any Conflicts of Interest which may impact on CEPI, a CEPI-funded project, or impact on the intended project results created as part of a CEPI-funded project.
- Where Third Parties are unsure as to the appropriate management of any Conflict of Interest. CEPI may work with Third Parties to support in mitigating, reducing or eliminating issues on Conflict of Interest.

What happens if a Conflict of Interest is disclosed to CEPI?

When a Conflict of Interest is disclosed to CEPI:

- Your contact at CEPI will discuss the matter with you to ensure they fully understand the situation, as well as any remediating actions you propose.
- Your contact at CEPI will discuss internally to confirm with the relevant expert teams within CEPI whether these actions are sufficient to mitigate the risk to CEPI.
- If there are any further proposed remediating actions, these will be discussed with you to reach an agreement on how to proceed.
- The various discussions will be documented and included in the project file at CEPI.

Compliance programme

CEPI has no single expectation of a compliance programme to manage Conflict of Interest risk for our Third Parties, recognising that the organisations we work with vary in size, complexity and risk-profile.

The below table suggests elements of what is considered good and better practice when it comes to identifying and managing Conflicts of Interest – however, each organisation should consider their own risk profile and the factors required to mitigate that, and should not rely on this as guidance.

Must	Good	Better
<ul style="list-style-type: none"> • A Conflict of Interest Policy which applies to all employees and associates (including for example consultants, members of advisory committees etc). This may form part of a boarder policy or Code of Conduct. • Clear Declaration of Interest process to identify and manage conflicts, including making CEPI aware where required. . 	<ul style="list-style-type: none"> • Conflict of Interests are included in induction training to ensure everyone is aware of the process, including a requirement to declare personal interests • Individuals have a responsibility to alert relevant teams to any actual, potential or perceived Conflict of Interest as they arise. • A Conflict of Interest register where any such declared conflicts can be tracked and mitigating actions managed. • Ability for individuals to raise concerns, including for example via a Speak Up or Whistleblowing system. 	<ul style="list-style-type: none"> • Requirement to complete a periodic declaration of interest (e.g. annually) • Reminders embedded in higher-risk activities to declare any Conflicts of Interest (including but not exclusive to, for example, procurement / grant giving decision making process, Board or Advisory Committee meetings). • Conflict of Interest register is regularly reviewed (e.g. annually) to ensure that all mitigating actions remain sufficient and appropriate. • Conflicts of interest are included in regular training and ongoing communications.

Help and support

There are a number of ways in which CEPI may be able to provide support and guidance to our Third Parties who are looking to strengthen their own compliance programme to effectively manage potential Conflicts of Interest.

- A number of elements of CEPI's own compliance programme (including our CoI policy) are published in the Document repository on www.cepi.net, and may be helpful as inspiration for creating your own
- CEPI undertakes training for some Awardees on a risk-based approach. However, if you feel that your teams would benefit from business integrity training (including coverage of managing Conflicts of Interest), please get in touch.
- CEPI's electronic Whistleblowing channel is available on www.cepi.net, and any concerns or allegations in relation to our projects are welcome to be reported through that channel, regardless of the nature of the individual reporting the issue. Please see [Speaking Up](#) for further information.
- CEPI conducts audits over some of our Third Parties; any findings from these may be shared with you to highlight key areas for further development.

Key sources for further information

Please reach out to your CEPI contact, or to compliance@cepi.net

Speaking up

CEPI prioritizes the prevention of misconduct and promotes a culture of openness and transparency. All Third Parties and other individuals are encouraged to report to CEPI concerns of non-compliance with the Code. If you have concerns regarding breaches of this Code, please report such breaches immediately to CEPI. We rely on you to help make sure that CEPI is aware of and can correct any issues that may not be in line with our ethical standards.

Where possible, you can report to your contact person within CEPI. You may also report to CEPI management if necessary.

CEPI has also selected a trusted external and independent third party specialized in compliance reports, with whom the whistleblower may communicate freely through the following [electronic channel](#). The channel also offers anonymous reporting options.

Date of last review	May 2026
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