

Keio University Conflicts Management Policy

1. Purpose of Establishment

Since its foundation in 1858, Keio University has played a leading role in numerous areas of our society under the motto “we strive to be the leader in all society”, advocated by Yukichi Fukuzawa, the founder of the University. Based on this tradition, Keio University shall lead the society to the future by implementing education that inspires people, exercising diligence to create and accumulate new intellectual values and opening up a new frontier of business. To achieve this mission, Keio University, as a university open to the society, has been promoting collaboration among the industry, government and other universities and academic institutions (hereafter “IGA Collaboration”) under the spirit of practical learning/science that contributes to the society (jitsugagku). With the increased demand for various achievements through the IGA Collaboration for the development of the society, Keio University is required to respond proactively to such needs and to further promote the IGA Collaboration activities. In implementing such activities, Keio University shall hereby establish the Conflicts Management Policy in relation to the IGA Collaboration, for the purpose of ensuring accountability to the society and to maintain the integrity of Keio University against the potential risks of conflicting interests associated with the activities, while respecting the intention of the Faculty Members, Etc. (as defined in Paragraph 4 of this Policy. Hereafter the same.) who are engaged in these activities, as well as establishing a favorable environment in which the Faculty Members, Etc. can engage in the IGA Collaboration activities with confidence.

2. Basic Policy for the Management of Conflicting Interests

Keio University shall lead the academia and the business arena, by actively making available to the society the research results or intellectual properties obtained or generated by the Faculty Members, Etc. in the course of implementing newly created intellectual values or newly pioneered business activities, through the IGA Collaboration. With regard to the potential risks of conflicting interests that may occur in association with such IGA Collaboration, Keio University shall comply with the basic policies as described below from the standpoint of maintaining the integrity of Keio University.

- (1) Keio University shall implement the creation of intellectual values and exploration of new frontiers of business as well as to contribute to the society by sharing and making such achievements available to the society. As part of these efforts, the University shall actively promote the IGA Collaboration.
- (2) A conflicts management system shall be established to prevent potential conflicts of interests that may occur in the course of IGA Collaboration and to minimize the effect of such conflicts of interests once they occur.
- (3) Transparency of IGA Collaboration activities shall be ensured by appropriate management of conflict of interests and disclosure of information. Maintenance of confidence and trust towards Keio University shall be achieved by clearly defining the accountability responsibility assumed by Keio University towards the society.
- (4) Keio University’s management of conflicting interests does not intend to limit IGA Collaboration which the Faculty Members, Etc. engage in. On the contrary, it optimally respects their independence in engaging in these activities. It also aims to establish a favorable environment in which the Faculty Members, Etc. may engage in IGA Collaboration activities with confidence, while maintaining the integrity of Keio University.

3. Definition of Conflicting Interests

Conflicting interests in the context of IGA Collaboration shall mean the conflict of economic interests and the conflict of responsibilities as defined below:

- (1) A “conflict of economic interests” is defined as the situation where the responsibility and/or duty based on the status as Faculty Member, Etc. at Keio University conflict with the profits that such Faculty Member, Etc. will obtain through the IGA Collaboration activities.
- (2) A “conflict of responsibilities” is defined as the situation where the responsibility and/or duty based on the status as Faculty Member, Etc. at Keio University conflict with the responsibility assumed by such Faculty Member, Etc. in relation to the IGA Collaboration activities.

4. Persons Subject to the Conflicts Management

The following persons engaged in the IGA Collaboration activities (collectively, “Faculty Members, Etc.)

shall be the subject of conflicts management:

- (1) Directors and other members of the Management of Keio University;
- (2) Faculty members and staff employed by Keio University (regardless of full-time or part-time employment);
- (3) Those who are granted certain status by Keio University; and
- (4) Graduate and undergraduate students of Keio University who are expressly identified as participants in the activities for IGA Collaboration activities.

5. Cases where Conflicts Management is Applicable

Conflicts Management shall be applied to the following cases in relation to the IGA Collaboration:

- (1) When a Faculty Member, Etc. is involved in multiple professional activities (the specific scope shall be defined separately);
- (2) When a Faculty Member, Etc. is receiving remuneration, shares or any other economic interests from any organization, etc. other than Keio University;
- (3) When a Faculty Member, Etc. transfers his or her invention, etc. or grants licenses for the invention to any organization, etc. other than Keio University;
- (4) When a Faculty Member, Etc. receives grants, donation, provision of equipment and/or consumables from any organization, etc. other than Keio University;
- (5) When use of facility and/or equipment of Keio University is provided to a person who receives any benefit from an organization, etc. provided in any of the foregoing Items (1) through (4);
- (6) When any goods are purchased and/or any service is offered from a person who receives any benefit from an organization, etc. provided in any of the foregoing Items (1) through (4); or
- (7) Cases other than the above, where it is apparent that a certain benefit or interest was provided, or such provision may be expected, in relation to the IGA Collaboration activities.

6. Conflicts Management System

The conflicts management in the context of IGA Collaboration shall be addressed by the following organizations and systems at Keio University:

- (1) Organization for Research Advancement and Administration (ORAA) Committee (hereafter “ORAA Committee”) shall evaluate the activities of the ORAA Research Ethics Committee (hereafter “Research Ethics Committee”) and, upon receiving request from the Research Ethics Committee, ORAA Committee shall make the final decision on the judgment on and countermeasures to be taken for the conflicts issues.
- (2) The Research Ethics Committee under the ORAA Committee shall be responsible for the following issues related to the conflicts management:
 - i. Development of rules and regulations related to the conflicts management policies;
 - ii. Formulation of enforcement measures related to conflicts management;
 - iii. Review/Investigation, judgment and notification related to conflicts of interests;
 - iv. Familiarization and Educational activities regarding conflicts management; and
 - v. Any other material matters in relation to the conflicts management.
- (3) The Research Ethics Committee may establish a subordinate organization called the “Conflicts Management Sub-Committee” and assign to such Sub-Committee a part of its responsibilities provided in the preceding Paragraph (2) related to conflicts management with regard to the IGA Collaboration.
- (4) There shall be a staff in charge of the conflicts management in the ORAA Office. The conflicts management officer shall be in charge of the administration regarding conflicts management in the context of IGA Collaboration, in accordance with the instructions by the Research Ethics Committee.
- (5) The Research Ethics Committee shall commission a counselor to address the conflicts issues. The counselor shall be engaged in the counseling of Faculty Member, Etc. on conflicts issues and provide the necessary advice thereto.

7. Responsibility of Faculty Member, Etc. for Conflicts Management

The Faculty Member, Etc. of Keio University engaged in the IGA Collaboration activities shall be required to perform the following for management of conflicting interests:

- (1) The Faculty Members, Etc. shall, upon engaging in IGA Collaboration activities, give maximum consideration and make reasonable efforts deemed necessary to prevent the conflicting conduct. If, in the event, any conflict of interests occur, the Faculty Member, Etc. shall provide the highest level of cooperation to necessary matters requested by Keio University to minimize the effects of such conflicts.

(2)When requested by Keio University to provide necessary cooperation in relation to conflicts management other than as provided in the preceding paragraph, the Faculty Member, Etc. shall provide the maximum cooperation thereto.

8. Other necessary matters in relation to conflicts management in the context of IGA Collaboration shall be stipulated separately.

April 1, 2005
President of Keio University