Det Norske Veritas
Foundation

CONFLICT OF INTEREST AND INTEGRITY POLICY IN RELATION TO RESEARCH FUNDING

1. Purpose

The Foundation's Research Funding Initiative exists to advance safety and sustainability through independent, high-quality research. This policy safeguards the integrity, independence, and impartiality of the Initiative's evaluation and decision-making processes and promotes confidence in its outcomes.

2. Scope

This policy applies to all persons involved in the evaluation, administration, or decision-making of grants, including members of governing bodies, the Research Funding Committee and advisory bodies, external experts, Secretariat staff, and any engaged third parties ("Covered Persons"). This policy shall be reviewed periodically by the Research Funding Committee and approved by the Board of Directors.

3. Key principles

All assessments and decisions shall be conducted impartially.

A person shall not participate in the preparation, assessment, discussion, or decision of a matter where circumstances may call into question the person's impartiality. This includes actual, potential, and perceived conflicts of interest.

In addition, the following principles apply to all Covered Persons:

- Transparency: relevant interests shall be disclosed in a timely manner.
- Recusal (disqualification): a person with a conflict shall not participate in the preparation, assessment, discussion, or decision in the relevant matter.
- Documentation: disclosures, assessments, and recusals shall be documented.
- Proportionality: mitigation measures shall be proportionate to the risk.
- Integrity and confidentiality: non-public information shall be handled confidentially and used solely for the purpose of the evaluation and administration of the grants.

4. Definitions

For the purposes of this policy:

- Conflict of interest: any interest or relationship that could compromise, or could reasonably be perceived to compromise, a person's impartiality in the performance of their duties under the Research Funding Initiative.
- Actual conflict: a direct interest or relationship that compromises impartiality.
- Potential conflict: an interest or relationship that could develop into an actual conflict.
- Perceived conflict: an interest or relationship that could reasonably be perceived as compromising impartiality, irrespective of whether it in fact does so.
- Close relationships: relationships that may compromise impartiality, including close family relationships, other close personal and/or financial relationships. Close family relationships include spouse or cohabitant, children, parents, siblings, and their respective spouses or cohabitants. Other close personal relationships include, for example, close friendships, mentor-mentee relationships, or shared household arrangements.
- Collaboration: professional relationships or collaboration that, due to how recent and the closeness, may compromise or be perceived to compromise impartiality (normally assessed within the last three years). Without limitation, collaboration includes co-authorship of publications, joint supervision of doctoral candidates, participation in the same research consortium or project, and membership of the same advisory board. Supervisory relationships (e.g. doctoral supervisor and student) shall be assessed regardless of the three-year period and may give rise to a permanent disqualification.
- Institutional conflict: a conflict arising where an applicant's institution is the same as the Covered Person's employer or primary institutional affiliation. Institutional conflicts shall be disclosed and assessed in accordance

with sections 5 and 6. The assessment shall take into account the size of the institution, the organisational distance between the Covered Person and the applicant, and the nature of the Covered Person's involvement.

- Financial interest: any direct or indirect financial interest in the outcome of a funding decision, including equity holdings, consultancy arrangements, board positions, royalty interests, or other pecuniary interests. Passive holdings in diversified investment funds or holdings below NOK 50,000 in publicly listed companies shall not, by themselves, constitute a financial interest for the purposes of this policy.

5. Disclosure of interests

All Covered Persons are responsible for identifying and disclosing relevant interests.

Disclosures shall be made:

- before participation in evaluation or decision-making processes, and
- without undue delay if circumstances change.

Disclosures shall include, as relevant, employment, roles and affiliations, close relationships, recent collaborations, institutional affiliations, financial interests, and other interests relevant to the assessment of impartiality.

All Covered Persons shall complete a declaration of interests form provided by the Secretariat before commencing their role. The declaration shall be updated annually and whenever circumstances change.

External experts shall, for each assigned proposal, complete a conflict of interest declaration before reviewing the proposal. The declaration shall confirm whether the expert is conflicted (ineligible to review) or unconflicted (eligible to review) with respect to each assigned proposal.

Disclosures shall be submitted to the Secretariat for initial review.

The Secretariat may conduct reasonable verification of disclosed interests, including cross-referencing applicant and expert databases, publication records, and institutional affiliations. The Secretariat shall notify the relevant Covered Person if a potential undisclosed conflict is identified through verification.

6. Assessment of conflicts of interest

Conflicts of interest are assessed case-by-case.
In assessing whether a person shall be disqualified, consideration may be given to:

- the nature of the interest or relationship
- how recent and how close the connection is
- the person’s involvement in the matter
- whether confidence in impartiality may be questioned

Based on the assessment, one of the following measures shall be applied, in proportion to the risk:

- Disclosure without recusal: where the conflict is minor or perceived only, and transparency is a sufficient safeguard. The disclosure shall be recorded, and the person may participate fully.
- Recusal: the person shall not take part in the relevant matter and shall withdraw from any related discussions, including leaving the room (physical or virtual) during the item.

7. Roles and responsibilities

The Secretary of the Board is the primary contact for all conflict of interest matters under this policy. The Secretary of the Board receives disclosures, makes an initial assessment, determines the appropriate measure in straightforward cases, and maintains the register referred to in section 9.

Where a matter is not straightforward – or involves a member of the Secretariat, the RFC, or the Board – the Secretary of the Board shall involve the Chair of the Research Funding Committee or the Chair of the Board of Directors, as appropriate to the circumstances. As a general rule:

- matters involving Secretariat staff, external experts (complex cases), or RFC members are referred to the Chair of the Research Funding Committee;
- matters involving the Chair of the RFC, or a member of the Board, are referred to the Chair of the Board of Directors.

Where the Chair of the Board is the conflicted party, the matter shall be referred to the Vice Chair.

The Chair of the Board of Directors has final authority on all conflict of interest matters under this policy.

Every Covered Person has a personal duty to identify and disclose their own conflicts of interest. Where a conflict is clear, the Covered Person should self-recuse immediately and notify the Secretary of the Board, without waiting for a formal assessment.

8. Confidentiality

All non-public information related to the Research Funding Initiative is confidential ("Confidential Information"). Confidential Information includes, without limitation: the content of proposals, the identity of applicants and experts, scores, written assessments, deliberations, rankings, and funding decisions prior to public announcement.

Covered Persons shall not disclose Confidential Information to any third party, nor use it for any purpose other than performing their duties under the Research Funding Initiative, without the prior written consent of the Foundation.

Covered Persons shall not upload, transmit, or process Confidential Information through any external system, tool, or service – including generative AI tools (such as ChatGPT, Copilot, Gemini, Claude, or similar), translation tools or other third-party software or digital solution – unless authorised.

This obligation does not apply to disclosure required by law, regulation, or order of a court or competent authority, provided that the Covered Person notifies the Foundation promptly (to the extent legally permitted) before making such disclosure.

For the avoidance of doubt, a Covered Person may disclose the fact that they have served in a role under the Research Funding Initiative (e.g. as an expert evaluator), but shall not disclose the substance of any proposal, assessment, deliberation, or decision.

The obligations under this section 8 survive the end of the Covered Person's involvement in the Research Funding Initiative and remain in force indefinitely.

9. Documentation

Conflicts of interest and any recusals shall be recorded as part of the decision-making process. The Secretariat shall maintain a register of all disclosures, assessments, and recusals. The register shall record, for each case: the identity of the Covered Person, the nature of the interest or relationship, the assessment made, the mitigation measure applied, and

the date. The register shall be available for review by the Chair of the Research Funding Committee and the Chair of the Board of Directors.

10. Breaches

Failure to comply with this policy may result in one or more of the following measures, applied proportionately to the nature and severity of the breach:

- Written warning
- Removal from the specific review or decision in question
- Removal from the role (termination of appointment)
- Exclusion from future participation in the Research Funding Initiative
- Withholding or reclaiming remuneration in respect of affected reviews
- Reporting to the Covered Person's employer or home institution (for external experts)

For sanctions involving removal from role or exclusion from future participation, the decision shall be approved by the Chair of the Research Funding Committee (or, for RFC members, by the Chair of the Board of Directors).

Before any sanction is imposed, the Covered Person concerned shall be given reasonable opportunity to provide an explanation.

Where a breach is discovered after scores or decisions have been made, the affected assessments shall be reviewed and, if necessary, rescored by an unconflicted expert. The Research Funding Committee shall assess the validity of any funding decision affected by the breach and take corrective action as appropriate.

11. Cooling-off provisions

A Covered Person who has been involved in the evaluation or decision-making of a specific call shall not apply for, or benefit from, funding under that call.

Former members of the Research Funding Committee, Secretariat staff and independent experts engaged to evaluate proposals shall not apply for funding from the Research Funding Initiative for a period of twelve months after the end of their involvement.

12. Gifts and hospitality

Covered Persons shall not accept gifts, hospitality, or other benefits from applicants or their representatives in connection with the Research Funding Initiative, other than modest hospitality in the normal course of professional interaction (e.g. refreshments at a conference). Any gift or hospitality that could reasonably be perceived as influencing the Covered Person's impartiality shall be declined and reported to the Secretariat.

13. Reporting of suspected breaches

Any Covered Person who becomes aware of a potential breach of this policy by another Covered Person shall report the matter without undue delay to the Secretariat (or, if the concern relates to a member of the Secretariat, to the Chair of the Research Funding Committee).

Reports may be made confidentially. The Foundation shall treat the identity of the reporting person as confidential to the extent permitted by law.

A person who reports a suspected breach in good faith shall not be subject to retaliation or adverse treatment as a result of making the report.

14. Final provisions

This policy is effective from 15.06.2026.

This policy shall be reviewed periodically by the Research Funding Committee and approved by the Board of Directors.

In the event of conflict between this policy and the terms of an individual appointment letter, the provision that provides the higher standard of integrity protection shall prevail.

This policy is governed by Norwegian law.