

EIT Health Code of good Conduct

including Policy on Conflicts of Interest

Version: 5

Approved by Management Board: March 2026

0. Definitions

“Articles of Association” shall mean the articles of association of EIT Health e.V. (“KIC LE”).

“Association” shall mean the EIT Health e.V., registered in the form of an association

“BP”: Business Plan

“Code” shall have the meaning assigned to it in Article 1 hereunder.

“EIT”: European Institute of Innovation and Technology

“EIT Health Staff” shall mean in this document members of the Supervisory Board of KIC LE, the members of the Management Board of KIC LE and the other persons employed under a labour contract by the KIC LE, the persons providing services to KIC LE, the personnel or consultants of the EIT Health Members & subgrantees when acting in an EIT Health coordination role for the benefit of the KIC.

“KIC”: A Knowledge and Innovation Community of the European Institute of Innovation and Technology

“KIC LE”: KIC Legal Entity, referring to EIT Health e.V.

“Partnership Agreement (PA)”: the agreement between EIT and the Association, laying down the general terms and conditions under which the KIC EIT Health must operate as an institutionalized European partnership.

(Model) Grant Agreement ((M)GA): an agreement signed between the Association and the EIT, laying down the provisions concerning the implementation of the KIC Business Plan through grants.

1. Introduction

EIT Health operates as an institutionalised European partnership which aims to contribute to European Union sustainable economic growth and competitiveness by reinforcing the innovation capacity of all Member States and the Union and in order to address major challenges faced by society. It does so by bringing together the actors of the knowledge triangle (research and innovation, education and business) in a thematically focused innovation ecosystem. The KIC runs the knowledge triangle activities, carries out outreach activities, ensures the dissemination of results, and promotes synergies and complementarities - thereby strengthening the innovation ecosystem in an open and transparent manner.

In accordance with Article 6.c) of the PA between EIT and EIT Health, the KIC must adopt its Code of Conduct based on the model provided by the EIT, which includes policies on conflict of interests, ethical values and integrity.

2. Purpose

The purpose of the EIT Health Code of Conduct is to lay down EIT Health's expectations and guiding principles for ethical behaviour, lawful conduct and conflict of interest management for EIT Health staff, board members, as well as all involved parties and stakeholders.

This Code ensures that all activities are conducted with integrity, transparency, and in compliance with applicable laws. It reflects our commitment to fostering an ethical, inclusive, and professional environment.

3. General provision

This Code contains the general principles of the moral and lawful conduct, which apply to all relations of EIT Health Staff falling within the scope of their activities for EIT Health, unless they are governed by specific provisions. This Code further contains a Conflict of Interest Policy, attached in Annex to this Code. This Code is complementary to the Articles of Association and By-Laws of EIT Health.

4. Impartiality and Independency

When making decisions, EIT Health Staff shall ensure that he/she shall always act taking into account the scope of his/her mandate and/or function independently and impartially and shall refrain from any preferential treatment. In particular, the members of the governing bodies of EIT Health shall perform their duties in conformity with the overall purpose of EIT Health, as laid down in the Articles of Association and the By-Laws of EIT Health. They shall refrain from acting solely in the individual interests of individual EIT Health Members or other stakeholders. The conduct of EIT Health Staff shall never be guided by personal interest or political pressure. The EIT Health Staff must avoid any actions or transactions that may harm the interests of EIT Health. In the event of conflicts of interest, they shall act in accordance with the Policy on Conflicts of Interest, attached in Annex to this Code.

5. Objectivity

When making decisions, EIT Health Staff shall take into consideration the factors relevant to the decision at stake and give each of them its proper weight in the decision, whilst excluding any irrelevant element from consideration. In particular, the members of the governing bodies of EIT Health shall apply this principle when preparing, approving and executing the Business Plan of EIT Health.

Particular attention must be paid to every activity paving the way to a resource allocation, whatever the kind of resource it is (grant, label, programme, project etc.). External experts, such as evaluators, must also be aware of EIT Health's Code of Conduct and conflict of interest prevention.

6. Information

EIT Health Staff shall provide in a timely and accurately manner information with his/her line manager or other Management Board members that is needed for the performance of their duties, for purposes such as documentation, reporting and transparency. When sharing information, EIT Health Staff shall consider the confidentiality provisions of the legally binding agreements, except when authorised or otherwise legally obligated to disclose. **Confidential information acquired in the course of execution of one's duty for EIT Health will not be used for personal advantage.** When communicating on a matter on which a competent body of EIT Health has taken a position, the EIT Health Staff shall represent the views of EIT Health competent body.

7. Transparency and accountability

EIT Health Staff must act in a transparent manner and be ready to justify the reasons for particular actions and the context in which they have been taken, taken, provided that this information is not confidential or could damage the interests of the EIT Health. EIT Health provides accessible communication channels and clear procedures for filing requests and complaints that enhance public engagement and foster transparency.

8. Lawfulness

The EIT Health Staff shall act according to law and apply the rules and procedures laid down in applicable law, rules and internal regulations. In particular, EIT Health Staff is to comply with privacy and information security laws and regulatory requirements, such as but not limited to the Regulation EU 2016/679 when personal information is collected, stored, processed, transmitted, and shared.

9. Principle of non-discrimination

EIT Health Staff shall avoid any unjustified discrimination between individuals, for example based on sex, race, colour, ethnic or social origin, genetic features, language, religion or belief, political or any other opinion, membership of a national minority, property, birth, disability, or age, as defined by the European Agency for Fundamental Rights. In taking decisions, EIT Health Staff shall ensure that the principle of equality of treatment is respected. Non-compliance will result in disciplinary measures established in the relevant policies, which are available on the EIT Health and/or intranet.

10. No Improper Advantage

Bribes or other means of obtaining undue or improper advantage are not to be promised, offered, authorized, given or accepted. This prohibition covers promising, offering, authorizing, giving or accepting anything of value to or from any third party, including national or European government officials, either directly or indirectly through a third party, in order to obtain or retain certain subsidies, approvals or authorizations, or an exemption from certain legal or contractual obligations.

EIT Health Staff shall not commit or participate in any fraudulent acts. EIT Health Staff shall immediately report any fraudulent acts by others concerning EIT Health that come to their knowledge. More detail can be found in the [EIT Health Anti-Fraud Strategy](#). Moreover, EIT Health's Whistleblowing Policy in the [Staff intranet](#) provides additional guidance on how fraud, corruption and bribery can be reported, such as in the [Whistleblower Channel](#).

11. Ethical standards

Principal values of EIT Health for ethical behaviour standards for all the employees, including members of decision-making/management bodies, Board members of KIC LE, reflect, for instance:

- trust (open and trustful communication between the colleagues, between the management and other staff members);
- mutual respect and collaboration (ensuring that each individual's contributions are valued);
- non-discrimination (equal treatment of colleagues, members and contractors not depending on the nationality, sex, racial or ethnic origin, religion, belief or sexual orientation);
- professional conduct (treating colleagues and members with dignity, fairness, and courtesy);
- zero tolerance for any form of psychological and sexual harassment;
- use of company assets exclusively for the business purposes of the KIC
- avoidance of fraud, bribery, corruption, and receiving any undue advantages
- accountability (full and accurate reporting of the financial information)
- diligence with financial duties (timely payments of invoices).

12. Gifts, Favours, and Payments

Board members, members of decision-making/management bodies, evaluators and staff, shall refrain from any advantage, direct or indirect (either as a gift or in the form of hospitality or payment) which is in any way connected to their role at the KIC, either for doing or omitting to do something in their official capacity or for showing advantage to someone or to an organisation. Inappropriate offers shall be reported to Compliance.

Gifts or favours not falling under the above cases are allowed to be accepted up to the value of 50 Euro per month for staff, and 50 Euro per year for others, and as long as they are in line with applicable laws.

13. Confidential Information and Personal Data - Duties pursuant to GDPR

Commercially and personal sensitive information needs to be protected, such as when it comes to the disclosure to the KIC LE personnel, KIC members, EIT and to third parties' personal data in line with GDPR, which includes (but is not limited to) the following obligations, as per the [Data Privacy Policy](#):

- to provide data subjects with privacy statements when the KIC LE or the entities participating in KIC activities handle the data of natural persons, in particular informing data subjects on contact details of Data Controller, the types of data that are being processed, the purpose of processing, the ground of processing, the rights of data subjects and means of their exercising, etc.
- to ensure that data subjects can exercise their rights properly
- to include the data protection requirements in the contractual relations of the KIC LE and entities participating in KIC activities
- to fulfil internal rules outlining the retention periods for different types of data and responsibilities of data controllers on the elimination of data
- to set up the necessary technical and security measures to prevent data breaches

14. Professionalism – Fairness

EIT Health Staff must conduct themselves in such a way as to maintain the integrity of and public confidence in EIT Health. EIT Health Staff shall always act in a professional manner and in good faith. They shall maintain skills important and relevant to EIT Health's needs. EIT Health Staff shall act fairly and reasonably. Individuals shall be treated with due respect and dignity.

15. Signatures and reviews

This Code and the Conflict of Interest Policy shall be signed by every EIT Health employee, Supervisory Board member, Management Board member, members of other EIT Health Boards, freelancers, external evaluators as part of their work or services contract signature. Whenever a new version becomes effective, it shall be signed by them all. EIT Health Members, subgrantees and contractors shall be made aware and adhere to the Code and Policy, available in their latest versions on the EIT Health website.

This Code and Policy will be revised at least every three years, and updated regularly whenever required, to ensure it is compliant with legislative and organisational changes.

The information contained in this document is the proprietary information of EIT Health e.V., is for internal use only, and should not be disclosed to a third party without the written consent of an authorised organisation's representative.

Revision History Date	Revision	Author	Description
2017	1.0	Jan-Philipp Beck	First version
April 2021	2.0	Sabine Schumann	Second version
September 2022	3.0	Sabine Schumann	Third version
January 2024	4.0	Sabine Schumann	Fourth version
March 2026	5.0	Sabine Schumann	Fifth version

I have received a copy of this current Code of Conduct and its Annex I of the Conflict of Interest Policy.

I have read, understand, and agree with them, and I will abide by them.

Name and signature:

Role / relation to EIT Health:

Date:

Annex 1: EIT Health Conflict of Interest Policy

Annex 2: EIT Health Conflict of Interest Declaration

Annex 3: EIT Health Conflict of Interest Mitigation Agreement

Annex 4: Conflict of Interest - EIT Health Supervisory and Management Boards

Annex 5: Annual declaration of interests - Supervisory and Management Board members

Annex 1 to the EIT Health Code of Conduct: EIT Health Conflict of Interest Policy

Review date: March 2026

EIT Health Conflict of Interest Policy

1. INTRODUCTION

The following constitutes the Conflict of Interest Policy of EIT Health (the “**Policy**”), which has been developed to govern the disclosure, management, and, if possible, avoidance of conflicts of interest within EIT Health. This Policy is compliant with and applies in addition to the requirements of the Articles of Association and By-Laws and other governing documents, as well as the applicable laws. The purpose of this policy is to protect the integrity of EIT Health's decision-making process, to enable stakeholders to have confidence in EIT Health's integrity, and to protect the integrity and reputation of the members of the Supervisory Board, the Management Board and other EIT Health Staff.

2. SCOPE

The Code of Conduct directly extends to all employees, members of the Management Board, members of the Supervisory Board, as well as any other decision-making or advisory bodies, of the KIC LE and any entity under its control.

All EIT Health Staff will strive to avoid any conflict of interest between the interests of EIT Health on the one hand, and personal, professional, and business interests on the other. This includes avoiding actual conflicts of interest as well as the perception of conflicts of interest.

3. DEFINITION OF CONFLICT OF INTEREST

A conflict of interest refers to a situation where the impartiality and objectivity of a decision, opinion or recommendation of a governing body of EIT Health is or might be perceived as being compromised. It arises when a member of the EIT Health Staff has a personal, professional or business interest which may be in conflict with or may influence the exercise of his/her obligations or responsibilities in his/her role with EIT Health.

A conflict of interest arises whenever personal activities and relationships interfere, or appear to interfere, with one's ability to act in the best interest of EIT Health. There is normally no risk for conflict of interest when the member of the governing body acts in the general interest of EIT Health. The mere fact that some members of the Supervisory Board are representatives of or have a professional link with a particular KIC Member does not imply that they have a conflict of interest with regard to decisions on the approval of the Business Plan (i.e. as opposed to decisions on specific amendments in order to promote the interests of individual KIC Members).

Examples of conflicts of interest include:

- a) A member of the Supervisory Board who is employed by a KIC Member may be faced with a decision in a meeting of the Supervisory Board regarding whether EIT funding for the individual KIC Member should be granted in the context of a discussion regarding amendments to the Business Plan.
- b) A member of the Management Board who is related to another member of EIT Health staff and there is a decision to be taken on staff pay.
- c) A member of the EIT Health Staff who has shares or other interests in a legal entity that may be awarded a grant under the Business Plan or a contract to do work or provide services for EIT Health, or is a director or partner of that legal entity or related to someone who is such a director or partner.
- d) Supervisory Board members should exclude themselves from any interactions with funded activities. Business Plan Calls stipulate that Supervisory Board members cannot submit proposals. Also, they should not be personally involved in proposals to or decisions of the New Business Committee.
- e) A Supervisory Board member/member of decision-making/Management Board member/employee/evaluator (or his/her close family member) has a management position/strategic advisory position/employment or contractual relationship/economic interest/any other interest with any affiliated entity/EIT Health member organisation/Subgrantee/Contractor at present or in the past two years.

For the purpose of assessing potential or actual conflict of interest, family members and relatives belonging to the same household or under the care of the members of the household or of immediate family (i.e. spouse, partner, parents, dependent family member) shall be considered as close family members.

Definition of independent Supervisory Board members:

As per the Articles of Association, article 15.1, the Partner Assembly shall appoint so many additional, independent members of the Supervisory Board that it is assured that at least half of the members of the Supervisory Board, including the Chairperson of the Supervisory Board, are Independent Members of the Supervisory Board. The Independent Members of the Supervisory Board may not in any way (neither directly nor indirectly) hold an interest in a Member or act for a Member, and must not have been active for a legal entity which could constitute a conflict of interest in their person, e.g. by working for a KIC Member, within the last two years prior to their appointment.

4. PROCEDURE IN CASE OF CONFLICT OF INTEREST

Members of the Supervisory Board

In case a situation of potential conflict of interests arises in the context of the Supervisory Board activities, the members of the Supervisory Board or any other person who identifies a potential conflict of interests shall immediately inform the Supervisory Board Chairperson. In case the conflict of interest regards the Chairperson, the person to be informed is the SB ExCo Chairperson.

The Supervisory Board Chairperson (or the Supervisory Board ExCo Chair) shall without delay decide on any specific measure in this respect. The member of the Supervisory Board concerned shall refrain from any actions that could be affected by the conflict of Interest. He/she withdraws from the part of the meeting at which there is a discussion of any arrangement or transaction affected by the potential conflict of interest. The member who has the potential conflict of interest does not vote on any such matter and is not to be counted when considering whether a quorum of members of the Supervisory Board is present during the decision.

Any such disclosure and the subsequent actions taken will be noted in the minutes of the Supervisory Board and will be centrally stored and monitored by the Compliance Officer.

Members of the Management Board and other EIT Health Staff

If at any time in the course of his/her duties a member of the Management Board or of the EIT Health Staff becomes aware of any potential conflict of interests, he/she shall:

- make a spontaneous declaration of interests, highlighting the potential conflict to the Compliance Officer, and
- refrain from any actions that could be affected by the conflict of interest.

The question of the existence of a potential conflict of interest must be asked of all members of a meeting involved in decision-making by the person chairing the meeting. This question and the answers given (including if the answer is no) must be systematically transcribed in the minutes of the meeting.

In case the potential conflict of interest regards the CEO of EIT Health, the person to be informed is the Chairperson of the Supervisory Board and the SB ExCo Chairperson. Provided that the Conflict of Interest has been disclosed, the Chairperson of the Supervisory Board, shall, without undue delay, decide how the conflict of interest shall be managed/resolved following the processes as defined in the relevant policies.

In case of potential conflict of interest situations, mitigation measures are to be defined, adapted to the specific case, for instance, the withdrawal from the discussions and decision-making process with regards to decisions that may be affected by the conflict of interest situation (e.g. strategic decisions concerning the organisation in question, HR, procurement, grant-related decisions).

Same as with the Supervisory Board, all disclosed conflicts of interest of the Management Board and Staff will be centrally stored and monitored by the Compliance Officer.

The EIT shall be informed about events of a breach of trust concerning the members of the Board or members of a decision-making/management body.

5. EX-POST TREATMENT OF SITUATIONS OF NON-COMPLIANCE WITH THE OBLIGATIONS OF THIS POLICY

Members of the Supervisory Board

Should the Supervisory Board of EIT Health become aware that a conflict of interest was not declared by a member of the Supervisory Board, the Supervisory Board shall decide on the appropriate measures to be taken after hearing the affected member of the Supervisory Board. The Supervisory Board may carry out an internal assessment involving outside counsel to determine the existence of the conflict of interest. The Supervisory Board Chairperson may also request the ELSI Board of EIT Health for advice.

Members of the Management Board and other EIT Health Staff

Any failure by the CEO, any other member of the Management Board or the EIT Health Staff to comply with his/her obligations under this policy of conflict of interests, whether intentionally or through negligence on his/her part, shall make him/her liable to administrative measures in accordance with the rules applicable in the specific case. The CEO shall be given the opportunity to explain his/her case to the Supervisory Board. The other members of the Management Board or the EIT Health Staff shall be given the opportunity to explain his/her case to the CEO. The Supervisory Board, respectively the CEO may carry out an internal assessment involving outside counsel to determine the existence of the conflict of interest. The Supervisory Board Chairperson, respectively the CEO, may also request the ELSI Board of EIT Health for advice.

All members of the Supervisory Board, the members of the Management Board and other EIT Health Staff shall be required to sign the following declaration. Further to the initial declarations, any new interests that may potentially lead to a conflict of interest situation need to be declared. In the case of high-risk positions (e.g. for Management and Supervisory Board members, members of the decision-making/management bodies), the declaration shall be made periodically, at least every second year.

This Policy is to be read and acknowledged by signing the Code of Conduct.

See also:

Annex 2: EIT Health Conflict of Interest Declaration

Annex 3: EIT Health Conflict of Interest Mitigation Agreement

Annex 4: Conflict of Interest - EIT Health Supervisory and Management Boards

Annex 5: Annual declaration of interests – Supervisory and Management Board members

Annex 2 to the EIT Health Code of Conduct: EIT Health Conflict of Interest Declaration

Review date: March 2026

EIT Health Conflict of Interest Declaration

(where not covered through signature of Code of Conduct)

EIT Health strives to avoid any conflict of interest between the interests of EIT Health on the one hand and personal, professional, and business interests on the other. This includes avoiding actual conflicts of interest as well as the perception of conflicts of interest.

A conflict of interest refers to a situation where the impartiality and objectivity of a decision, opinion or recommendation is or might be perceived as being compromised. It arises when a member of the EIT Health staff, SB member, evaluator etc. has a personal, professional or business interest that may be in conflict with or may influence the exercise of his/her obligations or responsibilities in his/her role with EIT Health. A conflict of interest arises whenever personal activities and relationships interfere, or appear to interfere, with one's ability to act in the best interest of EIT Health. There is normally no risk for conflict of interest when the member of the governing body acts in the general interest of EIT Health. The mere fact that members of the Supervisory Board are the representative of or have a professional link with a particular KIC Partner does not imply that they have a conflict of interest with regard to decisions on the approval of the Business Plan (i.e. as opposed to decisions on specific amendments in order to promote interests of individual KIC Partners).

The procedures in case of conflict of interest are defined in EIT Health's Conflict of Interest Policy.

Declaration on Conflict-of-Interest

I have received a copy of the current Conflict of Interest Policy of EIT Health. I have read, understand and agree with the Conflict of Interest Policy of EIT Health and I will abide by it. In case of any potential Conflict of Interest situation, I would submit the relevant Conflict of Interest Declaration in a separate document.

This declaration refers to my role as: *(EIT Health staff, Management Board member, Supervisory Board member, selection panel member of xxx recruitment, evaluator of xxx Call, etc.)*

Name:

Signature:

Date:

This declaration needs to be collected by your counterpart at EIT Health in the activity you are executing, who submits a copy to the Compliance Officer to be centrally stored.

Annex 3: EIT Health Conflict of Interest Mitigation Agreement

Review date: March 2026

EIT HEALTH CONFLICT OF INTEREST MITIGATION AGREEMENT

Parties:

The following Conflict of Interest Mitigation Agreement (hereafter Col Agreement) is drawn up between:

EIT Health e.V. ("EIT Health ("), with registered office at Mies-van-der-Rohe-Straße 1C, 80807 München, Germany, represented by xxx

And

xxx [address details]

And

Additional Party (optional, can be a source of conflict or person affected by the conflict)

1) Nature of Conflict

Describe the conflict (e.g. personal relation to a vendor in a bidding process that the Employee is in charge of), how this affects the Employee (e.g. may be biased in decision making), and what the potential damage or risk is for EIT Health (e.g. may not get the best vendor – more expensive, not best qualification etc.)

2) Transparency, Involved EIT Health Personnel

- a. *When has the Conflict of Interest been reported, by who, and who was notified*
- b. *Identify and list EIT Health staff who should be involved pursuant to Conflict of Interest Policy*
- c. *Itemise dates when conflict has been reported and involved staff has been informed*

3) Conflict Handling and Mitigation

- a. *External mitigation: If applicable, describe option to settle the conflict externally; e.g. if the Employee has a financial benefit as a result of a deal that EIT Health enters into,*

eliminate this financial benefit; in that case, the other party to the deal should be included to this agreement;

- b. Internal mitigation: limit / eliminate Employee's influence on the internal process; e.g. by delegating the process to an independent coworker; in certain cases, it may be sufficient to add independent coworkers to the process without removing the Employee; the proposal needs to be evaluated and confirmed by the Compliance Officer; list the involved people to who the process was delegated, list the dates and expected duration of the mitigation*

4) Compliance Officer Validation and Monitoring

- a. Assessment: confirm that the conflict mitigation has been validated with the Compliance officer and been considered as appropriate to solve the Conflict of Interest*
- b. Schedule Follow-Ups: schedule monitoring dates, if needed, in alignment with the duration of the mitigation*

5) Duration and closure of Conflict of Interest

- a. Start and finish dates of the Conflict of Interest situation*
- b. Close of Mitigation: confirm the close of the process where no finish date was set*

Name, date and signature(s) EIT Health

Name, date and signature(s) xxx

Annex 4: Conflict of Interest - EIT Health Supervisory and Management Boards

Review date: March 2026

CONFLICT OF INTEREST - EIT HEALTH BOARDS

1. INTRODUCTION

1) Credible and effective governance depends on the capacity of the Supervisory and Management Board members to make fair decisions, unbiased by the existence of other personal or professional interests.

2) Board members shall participate in their personal capacity and act in the best possible interests of EIT Health and its mission, independently from any academic, institutional, industrial, political or other specific interests they might have.

3) Integrity and high standards of professional conduct are crucial for EIT Health's independence and reputation. One aspect of integrity is to demonstrate that those persons involved in the work of the Supervisory Board act in the general interest of the EIT Health and that proportionate measures are taken to manage potential conflicts of interest.

4) EIT Health recognises that the expertise of the members of the Supervisory Board is crucial for the fulfillment of its tasks and that the quality of such expertise is inherently based upon prior experience. Board members should therefore be able to combine participation in EIT Health with other positions, public or private. As a result, most members of the Supervisory Board have various activities and therefore multiple interests, both in organisational and personal life. Consequently, certain potential or actual conflicts of interest cannot always be entirely avoided and their mere existence does not necessarily imply any wrongdoing.

The intention of this guidance is not to ban or sanction the holding of interests. The various interests of members, once put together, may well result in a balanced interest for the Board as a whole.

6) Since it is impossible to lay down a set of prescriptive rules to cover every single eventuality, the basic principle to be applied is that a conflict of interest occurs when it can be reasonably considered that a conflict could influence or bias the judgment of the Board member.

7) The primary responsibility for assessing whether an interest might impede independence or influence judgment and for declaring any possible conflict of interest is placed on the member concerned. Doubt or ignorance cannot be used as excuses to justify situations of conflicting interests.

8) This Code of Conduct applies *mutatis mutandis* to the meetings of the Management Board.

2. INTERESTS DECLARATIONS

The responsibility for declaring any possible conflict of interest is placed on the individuals completing their declaration.

Taking into account the need to ensure their independence the written annual declarations of interest shall be requested from the members of the Supervisory Board.

3. ACTIVITIES TO BE DECLARED

- Ownership or other investments, including shares
- Membership in a Supervisory, Management Board or scientific advisory body
- Employment
- Consultancy
- Memberships or affiliations
- Interests of close family members
- Any other activities that can be perceived as an interest in an EIT Health activity (e.g. intellectual property rights)

It shall be indicated if the activity is a current one, or from the past two years.

If members are unsure what interests should be declared, guidance can be provided by the Board Chairperson or the Compliance Officer.

4. WHEN SHOULD INTERESTS BE DECLARED?

1) Declaration of independence

Upon appointment, each member is required to sign a declaration stating his/her independence and commitment to comply with this code of good conduct

2) Annual Declaration of interests

Each Board member shall submit an annual declaration of interests, indicating the absence of any interest which might be considered prejudicial to their independence and including interests which are inherent to the professional background of the individual.

The Chairperson will review the declarations of interests of Supervisory Board members in order to identify any interests which might give rise to a conflict with regard to the work of the Supervisory Board. In this exercise the Chairperson may ask for the support of the Compliance Officer.

3) Spontaneous declarations

Members have the primary responsibility for spontaneously declaring any conflicts of interest at all times.

4) Meetings

Members of the Board are asked to declare, at the beginning of each meeting, any interests that might be considered prejudicial to their independence in relation to the items on the agenda. The outcome should be recorded in the minutes of meetings by the SB Secretary together with statements of declared interests and the outcome of discussions.

If during a meeting, a member becomes aware that he/she has an interest that may be in conflict with a point on the agenda, then this must be declared immediately to the Chairperson. This could include, for example, situations where a member is asked to approve the awarding of a contract to an organisation with which he/she is employed or otherwise affiliated.

The Chairperson, if need be having consulted the board member, will determine the appropriate course of action, relying heavily on the principle of proportionality. The appropriate course of action to take depends on the nature of the conflict. The following are to be considered guidelines for action, according to the nature and breadth of interests noted:

- The situation is not considered serious enough to exclude the member from discussions and decisions;
- The member is excluded from a particular decision or series of decisions, but may remain present and participate in discussions;
- The member is excluded from any discussions and decisions relating to a particular question or series of questions;
- The member is judged unable to complete his/her term of office and is therefore obliged to abandon his/her position on the Board.

The Chairperson should be substituted for a given meeting session by the SB Deputy if items on the agenda could lead to a conflict of interest affecting his/her judgment.

Declarations made at meetings and the outcome of discussions related to declarations of interest shall be duly recorded in the minutes of the meeting.

DECLARATION OF INDEPENDENCE AND COMMITMENT

Name:

Position: EIT Health Supervisory Board member

I hereby undertake to perform my duties in the best interests of EIT Health. In particular, I am aware that I am obliged to complete and sign an Annual Declaration of Interests which might be considered prejudicial to my independence in relation to the treatment of items on the agenda.

DONE IN ON

SIGNATURE

Annex 5: Annual declaration of interests – Supervisory and Management Board members

Review date: March 2026

Name:

EFT Health Supervisory/Management Board member

Nature of activity	Current Or until which date	Name of Entity Please also indicate if private or public	Subject Matter
Ownership or other investments, including shares			
Membership in a Board or scientific advisory body			
Employment			
Consultancy			
Memberships or affiliations			
Interests of close family members			
Other			

Declaration:

I declare on my word of honour that the information provided above is true and complete.

Name

Signature

Date

Explanations to Annex 5:

Name of entity or organisation is to be interpreted as meaning name, location and nature of all organisations (private, public, etc.) that relate to EIT. Thus, for the purpose of the declarations of interests the involvement in public bodies needs to be included as well.

When declaring financial interests e.g. stock and shares, only the type and the company name need to be stated.

"Ownership or other investments, including shares" is to be interpreted as meaning any substantial financial interests, including holding of stocks and shares, equity, bonds, partnership interests in the capital of a company, one of its subsidiaries or a company in which it has a holding. The holding of financial interests connected with a pension scheme would not be considered a financial interest, provided that the individual has no influence on its financial management

"Membership in a Board or Scientific Advisory Body " is to be interpreted as meaning any participation in the internal decision-making of a company, trade association or equivalent entity (e.g. board membership, directorship). Or is participating or has participated in the work of a Scientific Advisory Body with a right to vote on the outputs of that entity.

"Employment" is to be interpreted as covering all forms of employment, part-time and full-time, either paid or unpaid, in any organisation whose activities are linked to EIT Health areas.

"Consultancy/Advice" is to be interpreted as an activity in which the concerned person charges or does not charge a fee for providing advice or services in a particular field that might create situations of conflict of interest. In addition, any consulting/advisory contracts or collaborations with EIT Health falling outside the work of the Supervisory Board as identified above should be specified under this activity. The subject matter should only indicate the domain in which the consultancy is/has been active.

"Other membership or affiliation" is to be interpreted as any membership or affiliation other than the above which can be perceived as an interest in the field of activity of EIT Health

"Interests of close family members" are to be interpreted as meaning that they include known interests held by family members and relatives belonging to the same household or under the care of the members of the household. In order to maintain privacy, their names do not need to be declared. The relationship (e.g. wife) should not be specified.

"Name of entity or organisation" is to be interpreted as meaning name, location and nature of all organisations (private, public, etc.) that relate EIT Health. Thus, for the purpose of the declarations of interests, involvement in public bodies needs to be included as well.

"Subject matter" is to be interpreted as meaning the domain in which the activity was or is carried out.