

MTI-ATH CONFLICT OF INTEREST POLICY 2026

(A) PURPOSE OF CONFLICT OF INTEREST (COI) POLICY:

The purpose of this Conflict of Interest (COI) Policy is to ensure that all decisions, actions, and professional judgments within the Medical Teaching Institution ATH/AMC/ACD, Abbottabad (**hereafter called MTI-ATH, Abbottabad**) (Institution hereafter also mean MTI-ATH) are made with integrity, transparency, and in the best interest of patients, students, research participants, the Institution and the Government. This policy aims to identify, disclose, and manage conflicts that may compromise or appear to compromise professional responsibilities.

This Policy, titled **MTI-ATH Conflict of Interest Policy 2026**, has been duly approved by the Board of Governors of MTI-ATH/AMC/ACD, Abbottabad, and shall be in force with effect from 20th July 2026.

(B) SCOPE:

This policy applies to all employees of MTI-AMC/ACD/ATH, Abbottabad, including but not limited to:

- Executives
- Faculty members
- Doctors/dentists/lecturers in various positions
- Nurses
- Pharmacists
- Paramedical staff
- Support staff
- Researchers
- Administrative staff
- Trainees, interns, and students

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Hospital Director Office
Diary / Dispatch Section
Receiver Name _____
Date 21-07-2026 Time _____
Delivered By WJH

(C) TERMINOLOGIES:

Conflict of interest: A conflict of interest arises when personal interests, including financial interest, personal relationship or commitments with

entities outside the institution, clash with those of institutional interests and culture or with public interest and public confidence.

Types of conflicts of interest include (but is not limited to):

- **Financial Conflicts**: Ownership, investments, consultancy fees, honoraria, or gifts etc in any form or shape from external entities.
- **Professional Conflicts**: Dual roles that may impair objectivity (e.g., supervising or examining a family member or recruiting a family member).
- **Research Conflicts**: Financial or personal interests affecting research design, conduct, or reporting.
- **Educational Conflicts**: Bias in teaching, evaluation, or curriculum influenced by external relationships or any bias towards any student/trainee in any form.

Disclosure is the most basic step where the conflict of interest is declared to the authorities before any benefit is gained.

Recusal is to step away from any decision where a conflict of interest may exist. Any employee of MTI-ATH who (or his immediate family member) owns a share or any interest/financial interest or gain in a company or any entity in any form being considered for a contract at MTI-ATH or is part of a selection committee or any committee that is dealing with a close relative, must recuse himself/herself from the committee or any decision making.

Divestiture is where you sell off the financial interest that creates the conflict.

(D) POLICY STATEMENT:

All employees must:

- Avoid situations where conflicts of interest may arise.
- Disclose any actual, potential, or perceived conflicts promptly.
- Recuse themselves in any conflict situation.
- Act in the best interest of patients, students, and the institution at all times.
- Comply with institutional procedures for managing conflicts.

(E) DISCLOSURE REQUIREMENTS:

- All staff must complete an annual COI disclosure form.

- Immediate disclosure is required when a new conflict arises.
- Submission of disclosure form shall be applicable from 20th July 2026 on yearly basis.

Disclosures must include relevant financial, professional, or personal interests.

(F) MANAGEMENT OF CONFLICT OF INTEREST:

Upon disclosure, the Hospital/College will:

- Review the nature and extent of the conflict.
- Determine appropriate management strategies, which may include:
 - Recusal from decision-making or committees
 - Modification of duties
 - Independent oversight
 - Divestment of financial interests

(G) POLICY GUIDELINES REGARDING INSTITUTIONAL CONFLICT OF INTEREST

1. Every employee, particularly those in the position of procurement or on various Hospital/College administrative positions or committees or having prescribing authority or teaching/research position, has to declare conflict of interest.
2. Any financial administrative control by self or immediate family member, or partnership in a firm or business interests in entities that do business with MTI-ATH, Abbottabad or are in competition with the Institution.
3. Any corporate opportunity (financial or otherwise) used by any employee for his/her personal benefit is strictly prohibited. Recovery of the amount along with disciplinary proceedings shall be initiated in such a case.
4. Any commissions, rebates, gifts, prizes, vouchers etc in any shape or form, offered by any firm or entity doing business with the Institution accepted by any employee is un-ethical and illegal. This shall be grounds for disciplinary action including termination of services and recovery of the amount involved. Any rebates,

discounts etc must be offered directly to Finance Department and must be exclusively for the Institution and declared in writing to Finance Department that will be solely responsible for proper utilization of these.

5. Any employee of MTI-ATH, Abbottabad proceeding for any symposium, conference or any event paid by a pharmaceutical company or any business entity, must report this to the concerned Chairperson and Senior Manager Human Resource while applying for leave. Name of the firm sponsoring the event and name of the conference or meeting along with the country or city to be visited must be mentioned. Personal trips, family trips, leisure trips or vacations are strictly prohibited. Prior permission is mandatory. Non-compliance shall be considered as unethical and dealt with accordingly.
6. Medical representatives must not be allowed in OPD, wards or any patient care area before 2 pm.
7. Any clinical decision must not be influenced by financial incentives or external relationships. These include, but are not limited to, patient admission, prescriptions, diagnostics whether laboratory tests or radiological tests etc.
8. Acceptance of gifts or incentives in any form from pharmaceutical or medical device companies is strictly prohibited.
9. Prior permission must be obtained from Hospital Director for any meals or refreshments to be provided by any pharmaceutical company after an accredited academic event (to be approved by Dean AMC or Medical Director ATH) inside the Hospital premises. These must not be provided in a patient care area or in the absence of accredited academic event. Disciplinary action shall be initiated against the Team lead, HOD or Chairperson of the Department/Division where meals/refreshments are served without prior permission as described above.
10. Any payment made to any employee of MTI-ATH, Abbottabad by a pharmaceutical or any other firm for any purpose must be disclosed and reported to Finance Director.
11. Any payment made to any employee as part of research, consultancy or any activity by any vendor/firm must be disclosed to Finance Director or Senior Manager HR **before** the payment is received. All research or consultancy work must be carried out after obtaining **prior permission** from Institutional Research and Ethics Board in writing. All research or consultancy funding must be disclosed to the Hospital/Medical College authorities **in advance**.

12. Any employee who sits on an advisory board of any firm doing business with MTI-ATH, Abbottabad, must declare this to the concerned authority and also must not become member of any committee which deals with such a firm/entity.
13. All employees of MTI-ATH, Abbottabad, are required to file an annual conflict-of-interest certificate that covers there outside activities and financial interests as well as employment of any family member by any entity doing business with or has stakes in MTI-ATH, Abbottabad.
14. Whistle blowing policy: The Institution is committed to highest possible standards of openness, integrity and accountability. Staff members are encouraged to voice their concerns on any such unethical behavior and share their concerns with Senior Manager Human Resource, or Secretary BOG, MTI-ATH, Abbottabad. Name of the whistle-blower along with contactable phone number and CNIC must be attached with the application, in the interest of natural justice. All information and name and particulars of the complainant shall be kept strictly confidential. Anonymous applications or applications not supported by CNIC and contactable phone number or address and other related documents shall not be entertained.
15. Nepotism: Employment of immediate relatives is not allowed. Affidavit to be received from all newly recruited employees to MTI-ATH, Abbottabad, that they are not related to any staff member of the Hospital. Family members must recuse themselves from any selection committee and declare the conflict of interest, in writing, to the Hospital/Medical college authorities.
16. All disclosures will be documented and securely maintained.

(H) ENFORCEMENT:

- (a) As per MTI Rules (Appendix-06), all employees are required to strictly adhere to Institutional culture, ethics, and philosophy. Avoiding conflict of interest and adhering to conflict interest policies as well as Institutional culture and ethics is mandatory for each and every employee of MTI-ATH, Abbottabad.
- (b) Violation and non-compliance of this policy may lead to disciplinary action which may include termination from service, academic sanctions or recovery of amount received in cash or kind, or both.
- (c) Declaration of conflict of interest and reporting of any gifts or donations in any form to the Finance Department or Senior Manager

Human Resource of MTI-ATH, Abbottabad for proper handling of each case is mandatory.

(d) Serious breaches may be reported to regulatory authorities along with disciplinary proceedings by MTI-ATH, Abbottabad.

(I) **REVIEW OF POLICY:**

This policy will be reviewed annually by the BOG of MTI-ATH, Abbottabad and updated as necessary to ensure compliance with legal and ethical standards.

Effective Date: 20th July 2026

Approved By: Board of Governors of MTI-ATH, Abbottabad