

**Ateneo de Zamboanga University**  
**CONFLICT OF INTEREST POLICY**  
**IMPLEMENTING GUIDELINES**

**I. GENERAL POLICY STATEMENT**

The University affirms that all members of the Board of Trustees, officers, faculty, staff, and affiliated personnel shall uphold the highest standards of integrity, accountability, and transparency. In line with the University's Policy on Conflict of Interest, these Implementing Guidelines are issued to ensure the proper identification, disclosure, evaluation, and management of conflicts of interest in all institutional undertakings.

**II. DEFINITION OF TERMS**

1. **Conflict of Interest (COI)** - A situation where a person's personal, financial, or relational interest may compromise, or appear to compromise, the impartial performance of official duties.
2. **Types of Conflict**
  - a. **Actual Conflict** - A direct and existing conflict between official duties and personal interest
  - b. **Potential Conflict** - A foreseeable situation that may develop into a conflict
  - c. **Perceived Conflict** - A situation that may give rise to an appearance of bias, regardless of actual intent
3. **Material Interest** - Any financial, professional, or personal interest that may influence decision-making.
4. **Immediate Family** - Includes spouse, parents, children, siblings, and relatives up to the fourth civil degree.

**III. COVERAGE**

These Guidelines shall apply to all individuals who act in an official, fiduciary, or representative capacity on behalf of the University. This includes:

- Members of the Board of Trustees
- University Officers and Administrators
- Faculty and Staff, whether full-time, part-time, probationary, or contractual
- Consultants, project-based personnel, and any other individuals or entities engaged by or representing the University in any official capacity

All covered persons are expected to comply with these Guidelines in the performance of their duties and in all matters where the interests of the University may be affected.

**IV. GENERAL DUTIES AND RESPONSIBILITIES**

All covered persons shall observe the highest standards of integrity and shall:

1. **Duty of Disclosure**

Promptly and fully disclose any actual, potential, or perceived conflict of interest in accordance with these Guidelines.
2. **Duty of Inhibition**

Refrain from participating in any deliberation, evaluation, recommendation, or decision-making process where a conflict of interest exists or may reasonably be perceived to exist.
3. **Duty of Transparency and Accountability**

Conduct all official dealings in a manner that is transparent, fair, and aligned with the best interests of the University.
4. **Duty of Compliance**

Comply with all reporting, documentation, and procedural requirements under these Guidelines, and cooperate with any review or audit conducted by authorized University offices.

## V. DISCLOSURE REQUIREMENTS

To ensure proper identification and management of conflicts of interest, the following disclosure requirements shall be strictly observed:

### 1. Annual Disclosure

All covered persons shall submit a duly accomplished Conflict of Interest Disclosure Form on an annual basis, declaring any interests, relationships, or affiliations that may give rise to a conflict of interest. Such disclosure shall be updated as necessary.

### 2. Transaction-Based Disclosure

In addition to annual disclosure, covered persons shall disclose any conflict of interest prior to participating in specific transactions or institutional processes, including but not limited to:

- Procurement and bidding activities
- Hiring, rank and promotion, appointment, or evaluation processes
- Negotiation or approval of partnerships, memoranda of agreement (MOA), or memoranda of understanding (MOU)
- Research activities involving external funding, grants, or commercial interests

No participation shall be allowed unless the required disclosure has been made and appropriately evaluated.

### 3. Ad Hoc Disclosure

A disclosure shall be made immediately upon becoming aware of any circumstance that may give rise to an actual, potential, or perceived conflict of interest, regardless of whether it has been previously declared.

## VI. DISCLOSURE PROCESS

### 1. Submission

All Conflict of Interest disclosures shall be submitted to the appropriate office, depending on the position of the person making the disclosure. Disclosures from staff shall be submitted to the Human Resources and Administrative Development Office (HRADO), while disclosures from administrators and University officers shall be submitted to the Office of the President. Disclosures from members of the Board of Trustees shall be submitted to the Corporate Secretary.

### 2. Recording

All disclosures received shall be properly documented and entered into the Conflict of Interest Registry. The Registry shall serve as the official record of disclosures and shall be maintained by the appropriate office, subject to review by authorized personnel.

### 3. Confidentiality

All disclosures shall be treated with strict confidentiality and shall be accessed only by authorized offices or individuals for purposes of evaluation, compliance monitoring, or audit. Disclosure information shall not be used for any purpose other than those necessary for the proper implementation of these Guidelines.

## VII. EVALUATION AND DETERMINATION

A **Conflict of Interest Review Group (COIRG)** shall be constituted to evaluate disclosures and determine the appropriate course of action. The COIRG shall be composed of:

- The Legal Adviser, who shall serve as Chair
- The Director of the Human Resources Administration and Development Office (HRADO)
- A representative from Internal Audit, who shall act as observer
- The relevant Vice President, depending on the nature of the matter

The COIRG shall:

### 1. Determine the Existence of Conflict

Assess whether a disclosed interest constitutes an actual, potential, or perceived conflict of interest.

### 2. Evaluate Materiality and Severity

Determine the extent to which the conflict may affect objectivity, decision-making, or institutional integrity.

3. **Classify Risk Level**  
Classify the conflict as Low, Moderate, or High risk, based on its nature and potential impact.
4. **Recommend Appropriate Action**  
Recommend the appropriate course of action, which may include full participation, limited participation, mandatory recusal, or prohibition from involvement in the matter.

All determinations and recommendations shall be properly documented.

## VIII. PARTICIPATION AND RECUSAL

1. **Mandatory Recusal**  
A covered person shall inhibit or recuse himself or herself from any deliberation, discussion, evaluation, or decision-making process where:
  - A material financial or personal interest exists
  - An immediate family member is involved or stands to benefit
  - The circumstances present a clear or significant conflict of interest, whether actual or perceived

Recusal shall be made prior to participation and shall be formally recorded.

2. **Limited Participation**  
In exceptional cases, and upon determination by the appropriate authority or the COIRG, a person with a declared conflict of interest may be allowed to provide technical input or clarification. Such participation shall be strictly limited, shall not include any voting or decision-making authority, and shall be fully documented.
3. **Documentation**  
All disclosures, determinations, recusals, and authorized participation shall be properly documented and reflected in official records, including minutes of meetings, committee reports, and relevant institutional documents. Such documentation shall ensure transparency, accountability, and auditability of all actions taken under these Guidelines.

## IX. HIGH-RISK AREAS

1. **Procurement**  
In all procurement activities, any person who has an actual, potential, or perceived conflict of interest shall not participate in the Bids and Awards Committee (BAC), technical working group, or any evaluation or decision-making process. Mandatory prior disclosure of such conflict shall be made before any involvement in procurement proceedings.
2. **Hiring and Promotions**  
No individual shall participate in the screening, evaluation, or decision-making process for hiring, rank and promotion, appointment, or the award of faculty chairs or similar distinctions where the applicant or nominee is a relative within the prohibited degree or where a close personal relationship exists that may affect impartiality.
3. **Partnerships and Agreements**  
Any person involved in the review, negotiation, or approval of partnerships, memoranda of agreement, or similar arrangements shall disclose any connection, affiliation, or interest in the partner institution or entity prior to participation in the process.
4. **Research and Intellectual Property**  
All personnel engaged in research or projects involving external funding shall disclose all relevant funding sources and any financial or proprietary interests. Such activities shall comply with existing University policies on intellectual property and research governance.

## X. PROHIBITED ACTS

The following acts are strictly prohibited under these Guidelines:

1. **Non-Disclosure of Conflict**  
Failure to disclose any actual, potential, or perceived conflict of interest in a timely and truthful manner, including the omission or concealment of material information relevant to a transaction or decision.

2. **Participation Despite Conflict**  
Knowingly participating, directly or indirectly, in any deliberation, evaluation, recommendation, or decision-making process where a conflict of interest exists, despite the requirement of recusal or inhibition.
3. **Improper Influence or Interference**  
Exerting influence, whether formal or informal, over any person, committee, or process to affect the outcome of a matter in which one has a conflict of interest, including attempts to intervene after recusal.
4. **Use of Position for Personal or Third-Party Gain**  
Using one's position, authority, or access to confidential information to secure undue advantage, benefit, or preference for oneself, immediate family members, or any associated individual or entity.
5. **Circumvention of Procedures**  
Bypassing established University processes, controls, or safeguards (e.g., procurement, hiring, approvals) to facilitate or conceal a conflict of interest.
6. **Retaliation or Concealment**  
Engaging in acts of retaliation against individuals who disclose or report conflicts of interest in good faith, or taking steps to suppress, alter, or misrepresent records related to such disclosures.
7. **Misrepresentation of Compliance**  
Falsely certifying compliance with disclosure requirements or submitting inaccurate or misleading information in Conflict of Interest declarations or related documents.

All violations shall be subject to appropriate administrative action in accordance with University policies and due process.

## XI. SANCTIONS

Any violation of these Guidelines shall be subject to appropriate disciplinary action, depending on the nature, gravity, and frequency of the offense, and in accordance with existing University rules and due process requirements.

### 1. Range of Sanctions

The following sanctions may be imposed, singly or in combination, as warranted

#### a. Written Reprimand

A formal written notice issued to the respondent for minor or first-time violations, to be placed on record, with a directive to comply strictly with disclosure and recusal requirements moving forward.

#### b. Administrative Sanctions

For more serious or repeated violations, sanctions may include suspension, forfeiture of benefits, or other penalties consistent with the University's Administrative Manual, Faculty Manual, or applicable employment policies.

#### c. Disqualification from Committees or Roles

Temporary or permanent removal from participation in committees, panels, or positions of responsibility (e.g., BAC, hiring committees, research bodies), particularly where integrity and impartiality are essential.

#### d. Termination of Employment or Affiliation

In cases involving willful non-disclosure, bad faith, fraud, or clear abuse of authority for personal or third-party gain, termination of employment or severance of institutional affiliation may be imposed, subject to due process.

### 2. Determination of Sanctions

In determining the appropriate sanction, the University shall consider:

- The nature and materiality of the conflict
- Whether the violation was intentional or negligent

- The extent of harm or potential harm to the University
- The position and level of responsibility of the respondent
- Any prior violations or patterns of behavior

**3. Due Process**

All sanctions shall be imposed only after observance of due process, including:

- Notice of the charge or allegation
- Opportunity to respond and be heard
- Investigation and evaluation in accordance with established procedures
- Issuance of a formal decision by the proper authority

**4. Consistency with Existing Policies**

The imposition of sanctions shall be aligned with the University's existing disciplinary frameworks, including the Administrative Manual and relevant institutional policies, to ensure consistency, fairness, and accountability.

**XII. MONITORING AND REPORTING**

The University shall establish a systematic mechanism to ensure compliance with these Guidelines and to promote continuous improvement in managing conflicts of interest.

**1. Periodic Review by Internal Audit**

The Internal Audit Office shall conduct periodic and risk-based reviews of compliance with conflict of interest policies and procedures. This shall include, where appropriate, audits of procurement processes, hiring and promotion activities, partnerships, and research engagements to verify proper disclosure, documentation of recusals, and adherence to prescribed protocols.

**2. Annual Reporting to the Board**

An annual report on the implementation of these Guidelines shall be prepared and submitted to the Board of Trustees through the appropriate Committee (e.g., Audit Committee or Finance and Investment Committee). The report shall include a summary of disclosures made, actions taken, compliance issues identified, and recommendations for policy or procedural improvements.

**3. Oversight and Compliance**

The Human Resources and Administrative Development Office (HRADO), in coordination with the Legal Adviser, shall oversee the day-to-day implementation of these Guidelines. This includes maintaining records of disclosures, monitoring compliance across units, providing guidance on interpretation, and coordinating with relevant offices for enforcement and corrective action.

**XIII. TRAINING AND ORIENTATION**

The University shall ensure that all covered persons are adequately informed of their responsibilities under these Guidelines through structured orientation and continuing education.

**1. Orientation for New Personnel**

All newly hired or appointed employees, administrators, and officers shall undergo a mandatory orientation on the Conflict of Interest Policy and these Implementing Guidelines as part of the onboarding process.

**2. Continuing Education and Refresher Sessions**

Regular refresher sessions shall be conducted for all units to reinforce awareness, address emerging issues, and ensure consistent application of the Guidelines. These may be integrated into existing training programs or conducted as stand-alone sessions.

**3. Briefing for Board Members**

Members of the Board of Trustees shall be provided with periodic briefings on their obligations under the Conflict of Interest Policy, including disclosure requirements, recusal protocols, and governance implications, to support informed and ethical decision-making.

**XIV. EFFECTIVITY**

These Implementing Guidelines shall take effect immediately upon approval by the Board of Trustees. All covered persons are hereby directed to comply with the provisions herein from the date of effectivity, and all University offices shall take the necessary steps to ensure full implementation, dissemination, and integration of these Guidelines into existing institutional processes.

**Approved**, this 23<sup>rd</sup> day of May, 2026

*(ORIGINAL SIGNED)*

**Fr. Guillrey Anthony M. Andal, SJ**  
University President

*(ORIGINAL SIGNED)*

**Pedro Rufo N. Soliven**  
Chair

*(ORIGINAL SIGNED)*

**Fr. Xavier L. Olin, SJ**  
Trustee

*(ORIGINAL SIGNED)*

**Ruth Yu Owen**  
Vice Chair

*(ORIGINAL SIGNED)*

**Fr. Joseph Y. Haw, SJ**  
Trustee

*(ORIGINAL SIGNED)*

**Engr. Ibrahim M. Nuño**  
Trustee

*(ORIGINAL SIGNED)*

**Fr. Joaquin Jose Mari C. Sumpaico III, SJ**  
Trustee

*(ORIGINAL SIGNED)*

**Atty. Laisa M. Alamia**  
Trustee

*(ORIGINAL SIGNED)*

**Fr. Mars P. Tan, SJ**  
Trustee

*(ORIGINAL SIGNED)*

**Silvie Jasmin Bandiola-Agravante**  
Trustee

*(ORIGINAL SIGNED)*

**Fr. Antonio M. Basilio, SJ**  
Trustee

*(ORIGINAL SIGNED)*

**Dr. Anton Mari H. Lim**  
Trustee

*(ORIGINAL SIGNED)*

**Fr. Manuel A. Uy, Jr. SJ**  
Trustee

*(ORIGINAL SIGNED)*

**Joaquin Gregorio P. Cortez**  
Trustee

*(ORIGINAL SIGNED)*

**Fr. Manuel Simplicio V. Francisco, SJ**  
Trustee

Drafter: ATTY. ARMEE JAY L. CRESMUNDO (Executive Assistant to the President and Legal Adviser/Corporate Secretary)  
Endorsing Office: FR. GUILLREY ANTHONY M. ANDAL, SJ (University President)

**Annex 1. Disclosure Form Template**

**Ateneo de Zamboanga University**  
**CONFLICT OF INTEREST DISCLOSURE FORM**

**Name:** \_\_\_\_\_

**Position/Office:** \_\_\_\_\_

**Date:** \_\_\_\_\_

**A. Declaration**

Do you have any actual, potential, or perceived conflict of interest?

Yes

No

If YES, please provide details:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**B. Nature of Interest**

Financial Interest

Family/Personal Relationship

Professional/Business Relationship

Other (please specify): \_\_\_\_\_

**C. Description**

(Provide complete details of the relationship, transaction, or interest)

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**D. Affected Transaction/Activity**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**E. Undertaking**

I hereby declare that the information provided is true and complete. I undertake to comply with all University policies on conflict of interest, including recusal where required.

\_\_\_\_\_  
Signature over printed name

\_\_\_\_\_  
Date