

ASCOLA Transparency and Disclosure Declaration – Position Paper

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1. Context

The research landscape in competition law today has changed from what it was even only twenty-two years ago, when ASCOLA was founded. Much of the change has been for the better: the community of scholars is larger and more diverse, there are more journals covering the field, and the range of research methods is richer. However, this has been accompanied by an increase in conflicts of interest, in particular through external funding of individuals or research groups. It was as a response to this that the *ASCOLA Transparency and Disclosure Declaration* (the Declaration) was issued in 2018.

The Declaration's strength was in institutionalizing a culture of transparency among members. It has now percolated to many journals in the field. A partial list is found in Annex 2. The ASCOLA Declaration has been met with a positive response in academic and policy circles as an exemplar of good practices. Members should be proud of the 'ASCOLA effect' produced by the Declaration and their choice to use it in their research activities.

The Declaration is in line with the limited activities, competences, and resources that an international society like ASCOLA has. Regional ASCOLA chapters are organizing a large number of conferences and other public events. It is important that any future Declaration applies to all ASCOLA activities and to all relevant activities of its members.

2. Revisiting the Declaration

The main reason for reviewing the Declaration is that concerns about conflicts of interest caused by external funding, material support, and personal conflicts have increased since 2018. The Declaration should also be modernized and strengthened to ensure that a culture of transparency is maintained among members. Finally, the revised version seeks to leverage the 'ASCOLA effect' of the 2018 Declaration and to promote disclosure policies for other actors who can also contribute to boost research integrity. In what follows, I provide a brief overview of recent research and the results of a survey carried out in 2025. This information proved helpful in revising the Declaration.

Conflicts of interest research

Concerns about conflicts of interest are not unique to competition law, and the problem is probably greater in other fields.² Recent research in economics shows that there is less trust when the reader (professional or a member of the public) is informed that the research is funded by a party with a stake

¹ Disclosure based on the ASCOLA Declaration: as a research fellow at CERRE, my papers published by the Center are funded by sponsors, listed here: <https://cerre.eu/membership/our-members/>. CERRE's transparency and independence rules are found here: <https://cerre.eu/membership/our-members/>. I am the beneficiary of two grants from the Netherlands Organization for Scientific Research for projects on hydrogen regulation, and affiliated to a project funded by the Swedish Competition Authority for research on compliance programmes. I am also grateful to the ASCOLA members who sent in reports about practices in national jurisdictions, which are reported in Annex 1.

² E.g. Stamatakis, Weiler and Ioannides, 'Undue industry influences that distort healthcare research, strategy, expenditure and practice: a review' (2013) 43(5) *European Journal of Clinical Investigation* 469 <https://pubmed.ncbi.nlm.nih.gov/23521369/>; Lundh et al 'Industry Sponsorship and Research Outcome' (2017) available at: <https://pubmed.ncbi.nlm.nih.gov/23235689/>. A useful summary may be found here: <https://www.promarket.org/2025/05/08/transcript-john-ioannidis-keynote/>

in the results. It is referred to as a ‘conflict of interest discount’ and is significant.³ Research also hypothesizes that external funding has a negative externality over the credibility of all scholarship, although this causal link is not yet demonstrated empirically. The conflict of interest discount does not seem to affect citations,⁴ so that current disclosure policies may not yet fulfil all their potential.

While it is often the work of competition economists that comes in for greatest scrutiny when conflicts of interest are discussed, this is not something that legal scholars are immune from. The former Assistant Attorney General for antitrust offered this account: “an academic associated with an institute funded by several large technology firms signed an amicus brief opposing a country’s enforcement action. Later, without disclosing that fact, they gave a purportedly expert presentation at the OECD attacking that same enforcement action and advocating the OECD take a position favoring the institute’s funders.”⁵ This is clearly an extreme case (but a true story), and it shows vividly the concern that conflicts of interest raise.

There are other consequences that emerge from conflicts of interest and these affect research in economics and law, some negative, some positive. There may be a negative externality when the funder expects a certain outcome. Conversely, there may be a positive externality if funding leaves the researcher complete independence and allows for research that would not otherwise be carried out. Another negative externality may arise if the volume of external funding for one policy line or topic is greater than others. This has two effects: (i) it skews academic research towards where the money is; (ii) it results in greater volumes of research pointing in that one direction. The high concentration among funders can contribute to these effects by influencing the direction of research.⁶ Conversely, demand for external funding may facilitate the emergence of new funders who would diversify topics for research.

Much of the research expresses concern about corporate funding, which is where most of the concerns stem from. The OECD refers to the risk of ‘undue corporate influence.’⁷ This framing has three problems. First, it sets the bar too high by suggesting that concerns only arise when there is undue influence. This is poorly defined with reference to ‘deceptive or manipulative tactics that deliberately seek to deceive decision-makers.’⁸ The concern is deeper than this: it is not only about deception but about sponsoring a legal or an economic discourse that favors a given position or interpretation.⁹ Second, funding is only one source of material influence: access to data may be another. Moreover, personal connections may also yield a conflict of interest. Third, while the OECD and the scholarly community is rightly concerned about corporate funding because it is inherently suspect, there are other sources of funding available and full disclosure of all funding is essential to ensure transparency.

³ Barrios et al, ‘The Conflict-of-Interest Discount in the Marketplace of Ideas’ (2025)

<https://www.nber.org/papers/w33645>

⁴ Ibid.

⁵ Assistant Attorney General Jonathan Kanter Delivers Remarks for the Fordham Competition Law Institute’s 51st Annual Conference on International Antitrust Law and Policy (12 September 2024) at:

<https://www.justice.gov/archives/opa/speech/assistant-attorney-general-jonathan-kanter-delivers-remarks-fordham-competition-law-0>

⁶ On these negative externalities generally, see Lianos ‘Academic “Capture”? The Hidden Costs of Corporate Funding in Competition Policy Research and Proposed Remedies’ CLES Research Paper Series 7/2024.

⁷ OECD, ‘Corporate Influence in Competition Policymaking – Note by the Secretariat’ 7 May 2025

DAF/COMP(2025) https://www.oecd.org/en/publications/2025/05/corporate-influence-in-competition-policymaking_b1c1da87.html

⁸ Ibid., p.9.

⁹ Lianos (above n 6) on this point about shaping of discourses.

In sum: ASCOLA members are not immune from these effects but equally find themselves in a position where securing external funding is at times expected from their employers and the basis for promotion. This makes members both victims and beneficiaries of a system which relies, at least partially, on externally funded research. Concomitantly, not all external funding imposes negative externalities but rather serves to finance socially valuable research. A proportionate response to these risks and benefits is necessary to ensure that research integrity is maintained, which benefits the discipline, fellow scholars, and the public interest.

Regulation at national level

As shown in Annex 1 (Questions 1 and 2), funding from national schemes is sometimes regulated by law (e.g. Canada, Croatia, Slovenia, United States), as is external funding by private bodies in some instances (e.g. Croatia, Slovenia). In other jurisdictions, conflict of interest rules are designed by organizations (e.g. Germany, although here we note a number of organizations do not have rules about disclosure; the Netherlands via the Royal Netherlands Academy of Arts and Sciences; the UK via the UK Research Integrity Office). The degree of detail among these entities varies, for example the European Code of Conduct for Research Integrity, which is widely adopted, contains very brief mention of conflicts of interest.¹⁰ Conversely the Dutch Declaration of Scientific Independence (See Annex 1) is very prescriptive about the duties of the author and funder.

National regulations or soft laws normally apply both to an individual researcher and to institutions (e.g. Canada, Croatia, Germany, Slovenia, United Kingdom, United States). Some jurisdictions surveyed have no or very limited norms (e.g. India, Japan, Kazakhstan, Turkey).

Regulation at University level

As may be seen from Annex 1 (Questions 3 and 4) a number of Universities have internal procedures. Where there are national standards, these are normally implemented at University level. These regulate various aspects of good practices in research, not only conflicts of interest. Ethics committees exist in a number of institutions in the survey. Not all institutions have regulations about conflicts of interest. Some institutions (e.g. Georgetown and Tilburg University) require annual disclosures of certain external sources of funding.

Regulations in other academic societies

As may be seen from Annex 1 (Question 5) not every academic society has regulations governing third party funding and disclosures.

Academic Journals

Annex 2 reveals that many journals specializing in competition law have disclosure policies and that these are much more detailed than those found in more general journals. Policies are set by the journal or the publisher. The awareness of this issue is to be welcomed but there remain journals that have weak or non-existent policies.

3. Lessons for the revised Declaration

Academic research confirms the concern about conflicts of interest in research. Annex 1 provides a survey of the practices in 16 jurisdictions. This is too small a sample to draw general conclusions. However, we can observe differences among jurisdictions, the absence of conflict of interest rules in some, and divergence in the concept of conflict of interest and in the governance mechanisms in place. For the purposes of revisiting the Declaration the information supplied yields the following takeaways: (1) the lack of provisions in several institutions makes it more important that ASCOLA fills this gap and

¹⁰ Available at: <https://allea.org/wp-content/uploads/2023/06/European-Code-of-Conduct-Revised-Edition-2023.pdf> provides: "Authors disclose any financial and non-financial conflicts of interest as well as sources of support for the research or the publication." (para 2.7)

provides a model for other societies and other jurisdictions. (2) Of those which recognize conflicts of interest, the majority focus on financial conflicts; personal conflicts are not found frequently. One jurisdiction mentions the risk of corruption as well. This poses a challenge to the Declaration as to the breadth of coverage. (3) Most of the rules/guidelines focus on disclosures of the source of funding, but there appears to be limited requirements about disclosing the terms of such funding (i.e. the degree of involvement of the external funder in the research).

In light of the discussion above, the Declaration should aspire to set high standards for members of the Society. It should provide clear and workable disclosure policies. Members should become transparency advocates so that a culture of disclosure can be more fully embedded in academic practices at ASCOLA events, in other academic events, in research policies of Universities, all kinds of research networks, journals and other publications. Having said this, the Declaration is not sufficient to address the conflict of interest concerns identified and other actors are well-placed to emulate and complement the Declaration.

ANNEX 1 – response to the questionnaire

In 2025 all the regional chapter heads of ASCOLA were invited to participate in providing information about policies on disclosure of external funding. This is a fact-finding exercise to understand the state of play. Information was provided voluntarily by some members. The level of detail varies. When feasible, some additional details were uncovered by the Chair of the Ethics Committee.

We are grateful to those who have responded to this and eager to receive further responses from ASCOLA members who can add further knowledge about their jurisdiction or institution.

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At the time of writing responses from 16 jurisdictions have been received. The sample is too small to allow generalizations. However, already within this small sample we see variations in the level of awareness, the prominence and understanding of conflicts of interest, and in the manner with which conflicts of interest are governed.

1. Are there national regulations (hard law or soft law) that academics have to abide by when it comes to accepting external funding and publishing findings of such funded research? If yes, please provide a source document and if possible a summary.

Canada

When accepting *Federal* funding, yes. Canada's main federal funding agencies geared towards academic research are the Tri-Agency (SSHRC, NSERC, and CIHR). For SSHRC, refer to their policy on [Acknowledging SSHRC Support](#). This policy obliges the researcher to acknowledge the support, to note that the support is for the research but the outcome is independent and notably it gives examples on how to acknowledge support. For NSERC, refer to their [Requirements for the Public Announcement of NSERC Grants, Scholarships and Prizes](#); and for CIHR, refer to their policy on [Acknowledging CIHR support and promoting your research](#) and their [Requirements for Registration and Disclosure of Results from Clinical Trials](#)

Croatia

Yes, Croatia does have national regulations (both hard and soft law) that academics are expected to abide by when it comes to accepting external funding and publishing findings of such funded research. The key legislative and ethical frameworks are:

1. **Zakon o znanstvenoj djelatnosti i visokom obrazovanju (Act on Scientific Activity and Higher Education)**: This is the foundational "hard law" regulating scientific and higher education activities in Croatia.
 - **Source Document (Croatian)**: The most recent iteration is usually published in "Narodne novine" (Official Gazette). The 2022 version (NN 119/2022) is particularly relevant. Older versions (e.g., NN 123/03, 198/03, 105/04, etc.) also contained similar principles.
 - **Summary:**
 - **General Principles**: The Act emphasizes that scientific activity is based on "ethics of scientists," "openness to the public," and "international standards

of quality." It also stresses the social responsibility of the academic community.

- **Ethical Bodies:** It mandates that higher education institutions and scientific institutes establish **ethics committees** to promote and protect ethical principles.
- **National Oversight:** It refers to the **National Committee for Ethics in Science and Higher Education** (Odbor za etiku u znanosti i visokom obrazovanju - OEZVO) as the highest advisory national body, appointed by the Parliament. While the Committee can provide opinions and initiate procedures (e.g., for revoking doctoral degrees), its opinions are not always directly enforceable by institutions.
- **Funding and Transparency:** The Act, along with related government regulations, outlines mechanisms for public funding (e.g., through program agreements with institutions) and generally promotes transparent management of funds. While it doesn't always detail specific rules for *external* private funding to individual academics, the general principles of ethical conduct and accountability apply.
- **Academic Freedom and Responsibility:** It upholds academic freedom, but also links it to the responsibility of the academic community towards society.

2. **Etički kodeks Odbora za etiku u znanosti i visokom obrazovanju (Code of Ethics of the Committee for Ethics in Science and Higher Education - OEZVO):** This is a crucial "soft law" document that provides detailed ethical guidelines.

- **Source Document (Croatian):** You can often find this on the website of the Agency for Science and Higher Education (AZVO) or directly from the OEZVO. A widely referenced version was adopted in 2006 and has seen some amendments. For example, a document titled "Prijedlog Etičkog kodeksa Odbora za etiku u znanosti i visokom obrazovanju" is available (e.g., on AZVO's website).
- **Summary:**
 - **Scope:** This Code sets out principles, rights, and obligations for all members of the scientific and educational community (faculty, researchers, students, administration). It is intended to apply to all public higher education and scientific institutions in Croatia.
 - **Responsible Conduct of Research:** It defines and prohibits various forms of **scientific misconduct and fraud**, including:
 - **Fabrication:** Inventing data or results.
 - **Falsification:** Manipulating research materials, equipment, processes, or changing/omitting data to misrepresent results.
 - **Plagiarism:** Copying or taking ideas, thoughts, words, or results of others and presenting them as one's own. This includes specific rules for citation.
 - **Authorship:** Addresses issues of authorship, including "gift authorship" (undeserved authorship) and the removal of deserving authors.
 - **Conflict of Interest:** Explicitly addresses **conflict of interest** (sukob interesa) where personal interests may conflict with obligations to the institution. It also mentions "conflict of commitment" (sukob privrženosti) where external activities limit the performance of duties to the home institution. It requires disclosure and management of such conflicts.
 - **Transparency and Funding:** It emphasizes transparency in research and the efficient management of funds.
 - **Publication Ethics:** While not a separate section specifically on "publishing findings," the rules on scientific misconduct (fabrication, falsification,

- plagiarism, authorship) directly govern the ethical aspects of publishing research results. Simultaneous submission of manuscripts to multiple journals is generally prohibited unless officially regulated otherwise.
- **Social Responsibility:** Requires adherence to high ecological standards and proper disposal of waste generated during research.
3. **Code of Ethics of the Croatian Science Foundation (HRZZ):** This is another important "soft law" document, specific to projects funded by the main national research funding agency.
- **Source Document (English translation available):** "Code of Ethics of the Croatian Science Foundation (HRZZ)" (e.g., http://www3.hrzz.hr/UserDocsImages/DOKUMENTI%20NA%20ENGL/Code%20of%20Ethics_HRZZ.pdf)
 - **Summary:**
 - **Integrity and Ethics:** Contains principles of scientific integrity and ethics for all involved in HRZZ-funded projects (employees, members of bodies, applicants, researchers, reviewers).
 - **Project Lifecycle:** Applies to all stages of a project: proposal, management, data collection, processing, writing, publishing results, referencing, reporting, and data storage.
 - **Transparency and Financial Management:** Emphasizes transparency and efficient management of funds. Researchers must provide access to all project documentation, including financial documents, if requested by the Foundation.
 - **Conflict of Interest:** Prohibits the abuse of authority or position for personal gain or to benefit others, explicitly defining such actions as conflicts of interest.
 - **Scientific Dishonesty:** Defines and prohibits scientific dishonesty, including inventing data, falsification, and improper manipulation of data to "enhance" results. Also covers social accountability and public availability of research results.

Key Takeaways for Academics in Croatia:

- **Ethical Codes are Central:** While the primary law (Act on Scientific Activity and Higher Education) sets the overarching framework, the detailed ethical obligations are primarily outlined in the national Code of Ethics (OEZVO) and the codes of major funding bodies like HRZZ.
- **Conflict of Interest Management:** Academics must be aware of and proactively manage any potential conflicts of interest related to external funding, ensuring that personal interests do not compromise their research integrity or institutional obligations.
- **Research Integrity:** Strict adherence to principles of honesty, accuracy, and proper attribution is mandatory for all stages of research, from data collection to publication. Fabrication, falsification, and plagiarism are clearly prohibited.
- **Transparency:** Transparency in funding sources and the research process is expected, especially for publicly funded research.
- **Institutional Responsibility:** Higher education institutions are legally obligated to establish ethical committees and promote ethical conduct among their staff and students.

It's important for academics to consult the most current versions of these laws and codes, as they can be updated. Institutions often have their own internal ethics committees and specific guidelines that complement the national regulations.

Czechia

There is no regulation addressing specifically this issue. We have an act on the support of research, experimental development and innovations (Act No. 130/2002 Coll.), but it only covers conditions

under which the research is supported by public grants. It would be possible to implicitly infer from it that research thus supported shall not be at the same time supported by private funds, it is however not explicitly stated.

Germany

Organisation	Regulation	Relevant paragraphs	Summary	Source
Zivilrechtslehrer-vereinigung	Gute wissenschaftliche Praxis für das Verfassen wissenschaftlicher Qualifikationsarbeiten	3	Qualification papers should always disclose all (external) factors which, from the point of view of an objective third party, are likely to raise doubts as to whether a completely independent scientific judgment has been reached, e.g. scholarships or other third-party funding.	Link (German version available only)
Vereinigung der Deutschen Staatsrechtslehrer	Leitsätze – Gute wissenschaftliche Praxis im Öffentlichen Recht	46, 47	If expert opinions are published as a paper, the relationship to the third-party must be disclosed	Link (German version available only)
Verband der Hochschullehrer für Betriebswirtschaft	Hinweise zur ethischen und berufspraktischen Orientierung der Mitglieder	2 (pp. 11-14)	Conflicts of interest must be avoided and handled carefully and transparently	Link (German version available only)
Verein für Socialpolitik	Code of Ethics	II.4, II.7, II.8	<p>In scientific papers (including discussion papers), all sources of funding, external infrastructure facilities, and other external support used should be indicated.</p> <p>Third-party funded scientific reports should be impartial, and the underlying research should be conducted in an unbiased way. The interests of the client should not influence the results of the analysis.</p>	Link

			Whenever a scientific paper, report, or opinion may not be published without the prior consent to the content by a third party, this fact should be clearly indicated in the publication.	
Max Planck Society (MPG)	Code of Conduct	8	Obligation to inform the public about the research due to dual funding structure (public + private donations)	Link

Organisations without regulation about disclosure of public funding:

- Deutsche Forschungsgesellschaft (DFG)
- Deutscher Juristentag (DJT)
- Deutscher Hochschulverband (DHV)
- Anglo-German Law Society
- Vereinigung der Zivilprozessrechtslehrer
- Gesellschaft Junge Zivilrechtswissenschaft (GJZ)
- Deutscher Juristen-Fakultätentag
- Wissenschaftliche Vereinigung für das gesamte Regulierungsrecht
- German Law and Economics Association
- German Economic Association of Business Administration
- Schmalenbach-Gesellschaft
- Keynes-Gesellschaft

India

No laws or regulations. This is largely governed by institution-specific ethics guidelines. The University Grants Commission (UGC), which coordinates and determines the standards for higher education, issued the University Grants Commission (Promotion of Academic Integrity and Prevention of Plagiarism in Higher Educational Institutions) Regulations, 2018. The scope of this Regulation is limited in that it aims at curbing plagiarism instead of ensuring overall research ethics, including third-party funding disclosure. You may find the regulations here: <https://www.pondiuni.edu.in/Inhouse/IQAC/general/static/docs/PromotionEthicsAcademicIntegrity.pdf>

Italy

There are laws in Italy that address transparency and conflicts of interest in research funding, particularly in the following contexts:

- *Legge 240/2010*, Article 2 (requirement for universities to adopt codes of ethics), which obliges universities to implement ethical codes.
- *Codice di comportamento dei dipendenti pubblici* (DPR 62/2013), which sets out general principles of transparency and conflict-of-interest prevention for public employees, including academic staff.

These regulations are general in nature and are often implemented at the university level through internal codes of ethics and institutional regulations.

Japan

No laws or regulations.

Kazakhstan

No centralised or codified framework. Ethical standards and funding transparency are generally governed by internal university policies, which vary significantly among institutions.

Lithuania

There is an Ombudsperson (<https://etikostarnyba.lt/en/main/>) but it is not clear if issues about conflicts of interest have been discussed. Its remit is wide and there is a general code of ethics but this does not specifically address external funding, although one could imply it from the wide principles <https://etikostarnyba.lt/wp-content/uploads/2021/05/V-38-Recommendations-related-to-Academic-Ethics-Codes.pdf>

Netherlands

The Royal Netherlands Academy of Arts and Sciences (KNAW) is co-author of a Code for the prevention of improper influence due to conflicts of interest <https://storage.knaw.nl/2022-08/Code-for-the-prevention-of-improper-influence-due-to-conflicts-of-interest.pdf>

And also of the Netherlands Code of Conduct for Research Integrity (section 3.2 deals with disclosures and conflicts of interest).

https://storage.knaw.nl/2023-07/Netherlands-Code-of-Conduct-for-Research-Integrity_2018_UK-september2018.pdf

KNAW also published a declaration of scientific independence, reproduces below (source: https://storage.knaw.nl/2023-08/wetenschap_op_bestelling_2005.pdf) page 11.

Declaration of Scientific Independence:

- The structure of the research shall not be geared towards producing the desired outcome for the client.
- The assignment and its objective shall preferably be formulated jointly by the client and the researcher.
- Remuneration and other tokens of appreciation shall never depend on the outcome or interpretation of the research.
- The results of scientific research shall be published irrespective of whether they are favourable to the client.
- The scientist shall always be free to publish the findings of the research within a specified reasonable period of time. In this context, two months can be regarded as a reasonable period, with six months generally the maximum (this period being calculated from the moment that the final results are submitted to the client). An exception should be made where there are issues of Intellectual Property, in which case a period of no longer than twelve months would be acceptable.
- The method of publication shall be stipulated in the contract. Publication in a scientific journal shall take place in consultation with the client, but the researcher shall have the final say on the contents, the authors, the form of publication and where the research will be published.
- External financiers of research assignments and/or other sponsors shall be mentioned by name in publications and other forms of disclosure.

- Relevant interests and/or advisory relations of the researcher(s) shall be cited in publications and other forms of disclosure.
- The text of the contract shall be available for inspection in confidence by the National Council on Research Integrity (LOWI).

Poland

Higher Education and Science Law (2018): Mandates research integrity but does not regulate Conflicts of Interest.

The "[National Science Centre Code on Research Integrity and Research Funding Applications](#)" (2016) discusses conflict of interest (COI) on pp. 12–13.¹¹ The recommendations are broadly framed (e.g., "researchers must avoid situations that could compromise objectivity") but lack procedural specifics (e.g., no standardized COI disclosure forms or enforcement mechanisms).

The Committee of Legal Sciences of Polish Academy of Sciences ([Resolution of 2020](#)) recommends explicit COI disclosures in publications; however the rules provided are not more specific than those in ASCOLA guidelines.

NAWA (Polish National Agency for Academic Exchange): Requires COI statements in grant applications.

Slovakia

No generally applicable rules provided by law. Grant agreements may provide additional requirements related to respective schemes

Slovenia

Slovenia has a comprehensive framework of both hard and soft law documents governing research integrity, ethics, and funding.

a) Hard Law: **Zakon o znanstvenoraziskovalni in inovacijski dejavnosti (ZIRD) - Act on Scientific Research and Innovation Activities (2022)**

- **Source Document (Slovenian):** This is the main piece of legislation. It can be found in the Official Gazette of the Republic of Slovenia (Uradni list Republike Slovenije). The most recent version was adopted in 2021/2022 (e.g., Uradni list RS, št. 186/21, 103/23 – ZZNIC-B, 119/23 – ZIN-A).
- **Summary:**
 - **Purpose:** ZIRD regulates the organization, funding, and ethical conduct of scientific research and innovation activities in Slovenia.

¹¹ 1.6. Conflicts of interest

Responsible conduct of research includes disclosure of all potential conflicts of interest. This allows financial or other interests to be assessed on an informed basis in order to evaluate possible bias of professional judgement.

Conflict of interest is a situation in which the pursuit of one's own benefits, including material, procedural or psychological benefits, has impact on issuing an opinion or taking actions against the interests or in compliance with interests of another person.

Responsibilities

All parties involved with the research must disclose any conflict of interest and be aware of the rules of procedure applicable to the cases where the risk of such a conflict exists.

Research institutions are responsible for addressing conflicts of interest ensuring that appropriate standards are met. For this purpose, the institution should put in place a policy for preventing conflicts of interests and rules of procedure applicable to situations where a conflict of interests exists and must be addressed⁴⁷.

- **Ethical Principles:** It enshrines core ethical principles for research, including adherence to open science principles (open access to research results, responsible metrics, public involvement), integrity, and social responsibility.
- **National Council for Ethics and Integrity in Science:** The Act mandates the establishment of the **National Council for Ethics and Integrity in Science** (Nacionalni svet za etiko in integriteto v znanosti), which is a key national advisory body. This Council provides guidelines and opinions on ethical issues.
- **Funding Mechanisms:** It outlines how public funds are allocated for research (e.g., through the Slovenian Research and Innovation Agency - ARIS, formerly ARRS) and sets principles for the use of public funds.
- **Transparency:** While not detailing every aspect of private funding, the general principles of transparency and responsible management of public funds imply a need for clarity regarding other funding sources that might influence research.
- **Scope:** ZIRD explicitly applies to **all public and private research organizations and researchers** engaged in scientific research and innovation activities in Slovenia. This means it covers both individual researchers and institutions (research centers, departments).

b) Soft Law: The European Code of Conduct for Research Integrity (and Slovenian adoption)

- **Source Document:** Slovenia, as a member of the EU and signatory to various international declarations, adheres to the principles laid out in the **European Code of Conduct for Research Integrity** (e.g., European Science Foundation and ALLEA, Revised Edition 2017).
- **Summary:**
 - **Foundation:** This Code provides a comprehensive framework for research integrity, covering fundamental principles such as reliability, honesty, respect, and accountability.
 - **Misconduct:** It defines and categorizes research misconduct (fabrication, falsification, plagiarism) and other unacceptable practices.
 - **Publication Ethics:** It covers authorship, peer review, responsible communication of research, and data management. While not explicitly about "external funding," the principles of honesty and transparency apply to the reporting of all research, regardless of funding source. This implicitly requires disclosure of funding that might influence findings.
 - **Conflict of Interest:** It emphasizes the importance of managing conflicts of interest transparently.
 - **Scope:** While a "soft law," it is widely adopted and expected to be implemented by all research-performing organizations and individual researchers in Slovenia. Slovenian research institutions and funding agencies (like ARIS) align their internal policies with this Code.

c) Slovenian Research and Innovation Agency (ARIS) Guidelines

- **Source Document:** ARIS (Agencija za raziskovalno in inovacijsko dejavnost Republike Slovenije), the main public funder of research, issues its own rules and guidelines. These are available on the ARIS website (aris-rs.si). Look for documents related to ethics, integrity, and responsible conduct.
- **Summary:**
 - **Ethics and Integrity Principles:** ARIS guidelines incorporate principles of research ethics, integrity, and responsible conduct (honesty, objectivity, transparency, accountability).
 - **Open Access & Data Management:** They explicitly encourage open access to scientific publications and data and often require **Data Management Plans (DMPs)** as part of project proposals. This promotes transparency regarding research outputs and data.

- **Financial Accountability:** As a funding agency, ARIS has strict rules for the financial management of projects, including reporting on expenditures, audits, and ensuring that funds are used for their intended purpose. While primarily for public funds, the expectation of accountability extends to the overall financial integrity of a project, which would include co-funding or external contributions.
- **Conflict of Interest:** ARIS procedures for peer review and project evaluation include measures to prevent conflicts of interest for reviewers and evaluators, and similar principles are expected from researchers applying for and executing projects.
- **Scope:** These guidelines directly apply to **all researchers and institutions** (research organizations, universities, departments) that apply for and receive ARIS funding.

Turkey

No national rules. National funding institutions/agencies each have their own rules.

United Kingdom

UK Research Integrity Office (UKRIO); the Code of Practice for Research provides guidance on the ethical responsibilities of researchers, including disclosure of external funding and potential conflicts of interest when disseminating research findings. See section 3.5

<https://ukrio.org/wp-content/uploads/UKRIO-Code-of-Practice-for-Research.pdf> This sets out expected processes to be implemented, including disclosure and expects there to be a role for ethics committees when relevant. When it comes to organizations, there is also a provision for declining to carry out research if the conflict of interest “risks fatally compromising the validity or integrity of the research.” (3.5.2)

United States

Yes, comprehensive federal regulations exist. The most significant is 42 USC §6605. This requires all federal research agencies to mandate disclosure of “the amount, type, and source of all current and pending research support” including “in-kind contributions” and support “regardless of whether the source of the resource is foreign or domestic”. Additionally, NSF regulations under the Proposal and Award Policies Guide (PAPPG) Chapter IX require conflict of interest disclosures for all investigators in economics and social science research programs.² NIH/PHS regulations under 42 CFR § 50 mandate disclosure of significant financial interests that could affect research objectivity.³ These regulations apply to any researcher receiving federal funding exceeding \$100,000 annually from agencies like NSF, NIH, or DOJ.

2. Do the national regulations cover individual researchers only, or do they also apply to research centres or Departments? If possible, please provide a summary.

Canada

Any person/partner/institution named on the funding application would need to disclose the funder when promoting/disseminating the work.

Croatia

Yes, national regulations and ethical frameworks apply to both individuals and research centers or departments.

Here's a summary of how this dual scope is addressed:

1. Act on Scientific Activity and Higher Education (Zakon o znanstvenoj djelatnosti i visokom obrazovanju)

This “hard law” primarily sets the **institutional framework** and responsibilities.

- **Institutional Obligation:** The Act *mandates* that higher education institutions and scientific institutes establish **ethics committees** and adopt their own codes of ethics. These institutional codes must be in line with the national Code of Ethics (OEZVO). This means that institutions are legally responsible for upholding ethical principles within their organizational structure.
- **System-Wide Principles:** It defines the general principles governing scientific activity and higher education across the entire system, including the "ethics of scientists," "openness to the public," and "international standards of quality." These are principles that the *entire system*, composed of individual researchers and institutions, must adhere to.
- **Oversight Bodies:** It establishes national bodies like the **National Committee for Ethics in Science and Higher Education (OEZVO)**, which is an advisory body for the entire system, providing opinions and guidelines that influence all institutions and their members.

2. Code of Ethics of the Committee for Ethics in Science and Higher Education (OEZVO)

This "soft law" document is explicit in its broad application.

- **Scope:** The Preamble of this Code states that it determines ethical principles, rights, and obligations that regulate human and professional relationships among **teaching, scientific, student, and administrative members of the scientific and educational community**. This clearly includes individuals at all levels.
- **Institutional Responsibility:** Crucially, Article 6, titled "RESPONSIBILITY OF INSTITUTIONS IN THE SYSTEM," explicitly states:
 - "Institutions in the system are obliged to precisely and unambiguously define rules, regulations and procedures, and the duties and responsibilities of all involved."
 - "Institutions are obliged to promote ethics in all described aspects and to educate all participants about the rules, their rights and obligations."
 - "The institution has the ethical responsibility to consistently verify whether all involved adhere to the prescribed rules."
 - This section clearly places the responsibility on institutions (research centers, faculties, departments within universities) to create, implement, and enforce ethical guidelines and to educate their staff and students about them.
- **Specific Misconduct:** While defining scientific misconduct (fabrication, falsification, plagiarism, abuse of authorship, conflict of interest), these are actions primarily committed by **individuals**. However, the *institutional responsibility* is to prevent, detect, and address such misconduct.

3. Code of Ethics of the Croatian Science Foundation (HRZZ)

As the main funding agency, HRZZ's Code applies to both grant recipients and the institutions they belong to.

- **Stakeholders:** The HRZZ Code of Ethics applies to "all Foundation's employees, members of the Foundation's bodies and boards, evaluators and **beneficiaries of the Foundation's funds**." Beneficiaries include individual researchers (Principal Investigators) and, by extension, their institutions, as projects are typically managed through the institution.
- **Project Lifecycle:** It covers the entire lifecycle of a project, from proposal to publication and data storage, meaning that both individual actions and institutional processes related to these projects must adhere to the ethical principles.
- **Financial Accountability:** It emphasizes that researchers are accountable towards their employers (institutions) and funders for the efficient and transparent use of funds, implying institutional oversight and adherence to financial regulations.

Summary: Dual Application

Croatian national regulations and ethical codes adopt a **dual approach**:

- **Individual Accountability:** They define the ethical obligations and prohibit misconduct for individual academics, researchers, and students.
- **Institutional Responsibility:** They place a clear obligation on research centers, university departments, faculties, and other scientific institutions to:

- Establish and maintain their own ethics committees and codes.
- Promote ethical conduct among their members.
- Educate their staff and students on ethical principles.
- Implement procedures for preventing, investigating, and addressing scientific misconduct and conflicts of interest.
- Ensure transparent and responsible management of research funds.

This ensures that there is a layered system of ethical oversight and responsibility, from the individual researcher's conduct to the institutional environment in which research is conducted.

Czechia

The regulation above applies to all possible beneficiaries, including research centers.

Germany

All regulations choose a holistic approach and apply to all scientific publications.

Italy

The provisions generally apply to individuals but may have indirect effects on entities such as departments or research centres, especially when involved in externally funded agreements or projects.

Lithuania

Vytautas Magnus University implements the code of ethics but I am unable to read it.

<https://www.vdu.lt/wp-content/uploads/2023/05/Etikos-kodeksas.pdf>

Poland

Both individuals and organizations

Slovenia

The national regulations in Slovenia (ZIRD, European Code of Conduct, ARIS guidelines) unequivocally apply to both individual researchers and research centers/departments/institutions.

- **Individual Accountability:** The regulations define ethical conduct and prohibit misconduct for **individual researchers**. For example, plagiarism, data fabrication, and falsification are actions committed by individuals, and they are held accountable under these frameworks. Conflicts of interest are also largely individual in nature.
- **Institutional Responsibility:** Crucially, these frameworks also place significant **obligations on institutions** (universities, faculties, research institutes, and their departments/centers) to:
 - **Establish and maintain internal ethical oversight:** This includes setting up ethics committees (e.g., for human subjects research, animal research), developing internal codes of ethics, and having clear procedures for addressing alleged misconduct. ZIRD explicitly mentions the role of research organizations.
 - **Promote a culture of integrity:** Institutions are expected to educate their staff and students on research integrity, foster an ethical research environment, and prevent undue pressure that might compromise research.
 - **Manage institutional conflicts of interest:** Beyond individual conflicts, institutions must manage situations where their own financial interests (e.g., from external funding from a company) could compromise the integrity of their research or educational mission.

- **Ensure transparent financial management:** Institutions are responsible for the proper accounting and use of all research funds, whether public or private, and for providing necessary documentation to funders.
- **Provide infrastructure and support:** This includes ensuring proper data management, secure data storage, and access to necessary resources for ethical research.

This dual application ensures a comprehensive system of research integrity and accountability throughout the Slovenian research ecosystem.

Turkey

Rules of funding institutions only cover individual researchers. Research centres, department would have to comply with internal rules of their own institutions.

United Kingdom

Rules above apply to both organizations and researchers.

United States

Both individual researchers and institutional entities are covered. For example, the CHIPS Act defines “entity” to include institutions that “applied for or received a research and development award” and requires institutional certification that researchers have been made aware of disclosure requirements.

3. Are there any regulations in your university about external funding and disclosure? If yes, please provide a source document and if possible a summary.

Canada

Western University. Many Western University policies reiterate our adherence to Tri-Agency policies, so that seems to suggest we share the Tri-Agency approach. All Western University policies regarding research are available at this link: https://uwo.ca/univsec//policies_procedures/research.html. It addresses conflicts of interest (here: https://uwo.ca/univsec/pdf/policies_procedures/section7/mapp70.pdf) by reference to other documents that are not linked.

All Western University policies regarding financials (which sometimes apply to research funding) are available at this link: https://uwo.ca/univsec//policies_procedures/financial.html. For example there is a document that discusses externally funded Chairs (https://uwo.ca/univsec/pdf/policies_procedures/section2/mapp222.pdf) but issues of conflict of interest are not provided for here.

I found one other policy document that mentions disclosures in relation to research, [MAPP 1.23](#), section 13 (on p. 6 of the document), but I do not know how relevant it is...

Western appears to follow whatever the sponsor's expectations are regarding disclosure. That is, if disclosure is required or expected by the sponsor or funding agency, our policies would require us to meet the sponsor's terms.

Croatia

The University of Zagreb, as the largest university in Croatia, has its own internal regulations and ethical codes that build upon the national framework. These documents address external funding and disclosure, especially concerning conflicts of interest and the integrity of research.

Here are the key documents and a summary:

1. Statut Sveučilišta u Zagrebu (Statute of the University of Zagreb)

This is the fundamental governing document of the University. It aligns with the national Act on Scientific Activity and Higher Education.

- **Source Document (Croatian):** The Statute is regularly updated. You can typically find the most recent version on the official University of Zagreb website under "Propisi" (Regulations) or "Dokumenti" (Documents). A recent version was adopted in late 2020 or early 2023 (e.g., "Statut Sveučilišta u Zagrebu - na snazi od 31. ožujka 2023." or similar).
- **Summary:**
 - **Autonomy and Public Responsibility:** The Statute defines the University as a public institution with autonomy but also significant public responsibilities. This underpins the need for transparency and ethical conduct in all its operations, including financial ones.
 - **Ethical Framework:** It generally refers to the ethical principles that govern academic work and often mandates the adoption of an ethical code.
 - **Financial Management:** While not going into granular detail about individual external funding, it sets the overall framework for how the University manages its finances and assets. It emphasizes that any profit from activities (including research) must be used for the advancement and development of the University's core activities.
 - **Role of Rectors/Deans:** It outlines the responsibilities of the Rector and other university bodies in overseeing the legal and financial operations of the University and its constituent faculties. This implies oversight of external funding.

2. Etički kodeks Sveučilišta u Zagrebu (Code of Ethics of the University of Zagreb)

This is the most direct source for regulations concerning ethical conduct, which includes aspects of external funding and disclosure.

- **Source Document (Croatian):** This document is available on the University of Zagreb's official website, often linked from the "Propisi" section or directly from the Rectorate's pages. A version from 2020 or later should be current.
- **Summary:**
 - **Purpose and Scope:** The Code's purpose is to promote values specific to university activity and applies to *all members of the university community* (academics, students, administrative staff) and all its constituent parts (faculties, departments).
 - **Conflict of Interest (Sukob interesa):** This is a central theme. The Code explicitly addresses the need to avoid and manage conflicts of interest. It states that members of the university community must not misuse their authority or allow personal interests and relationships to influence objective judgment or the ethical and professional performance of their duties. This directly relates to external funding, where personal gain or outside influence could compromise the integrity of research or teaching.
 - **Transparency:** The Code generally supports transparency in regulations and operations.
 - **Responsible Conduct of Research:** It reinforces principles of academic freedom alongside the responsibility for honest, objective, and unbiased research. While not detailing specific disclosure forms for every external funding source, the principles of avoiding conflicts of interest and ensuring research integrity inherently require transparency about influences on research outcomes.
 - **Misconduct:** It outlines what constitutes unethical behavior and scientific misconduct, such as fabrication, falsification, and plagiarism, which are directly relevant to the publication of findings from any funded research.
 - **Social Responsibility:** It highlights the University's social responsibility and the expectation that external activities of academics should not conflict with their professional obligations to the University or harm its reputation.

3. Faculty-Specific Regulations and Ethics Committees

It's important to note that while the University of Zagreb has an overarching Statute and Code of Ethics, individual faculties (departments/schools) often have their *own* specific internal rules, procedures, and ethics committees. These faculty-level documents delve into more granular details regarding:

- **Project Management:** Procedures for applying for, managing, and reporting on externally funded projects.
- **Approval Processes:** Internal approval requirements for academics to engage in external projects or accept external remunerations.
- **Disclosure Forms:** Some faculties might have specific forms for disclosing external engagements, financial interests, or potential conflicts of interest related to research or consulting activities.
- **Intellectual Property (IP) Policies:** Regulations on how intellectual property generated from research (especially externally funded research) is handled, including ownership, commercialization, and revenue sharing.

To get the most precise information for a specific academic, it would be crucial to consult:

- The **University of Zagreb's official website** (unizg.hr) for its Statute and general Code of Ethics.
- The **website of the specific Faculty** or department, as they might have their own more detailed "Pravilnik" (Rulebook) or "Etički kodeksi" that provides more granular guidance on external funding and disclosure requirements pertinent to their specific field and types of external engagement.
- The **Ethics Committee** of the relevant Faculty or the University's central ethics committee, as they are the bodies responsible for interpreting and enforcing these rules.

In summary, while the national regulations provide the foundation, the University of Zagreb's own Statute and especially its Code of Ethics address external funding and disclosure primarily through the lens of managing **conflicts of interest** and ensuring **research integrity** and **transparency**. Individual faculties often elaborate on these principles with specific internal procedures.

Czechia

Masaryk University - no

Germany

Organisation	Regulation	Relevant paragraphs	Summary	Source
University of Goettingen	Rules of the University of Göttingen Governing the Safeguarding of Good Research Practice	§ 1 I 5 No. 1 lit. h	General obligation to disclose conflicts of interest	Link
Frankfurt School of Finance and Management	--	--	--	--

India

BML Munjal School of Law is in the process of drafting guidelines

Italy

University of Teramo

Article 8 – Freedom of research and the obligation to maintain integrity and methodological transparency.

Article 9 – Conflict of interest: obligation to report and abstain in cases where private interests conflict with those of the University.

Article 10 – Intellectual property: obligation to declare any funding received for the publication of scientific works.

Japan

Kyoto University (KU) has a procedure for receiving donations. Prospective donors must inform the KU administration office of their intent, specifying the intended use of the funds, the department or individual who utilize them, and the amount. The proposal is then reviewed at a faculty meeting. Once approved, the funds are sent to KU rather than directly to the designated department or individual. The recipient must adhere to KU's remittance rules when using the funds.

In cases where KU cannot receive the funds directly, the designated individual may initially accept the donation into their own account, but they are required to transfer it to KU.

While acknowledgments are generally expected, they are not strictly required. Some donors even indicate that acknowledgment is unnecessary. KU's official donation guidelines can be found here: [Kyoto University Donation Regulations]

(https://www.kyoto-u.ac.jp/uni_int/kitei/reiki_honbun/w002RG00000927.html)

Kazakhstan

At KIMEP ethical research practices are encouraged and overseen by internal bodies such as the Academic Affairs Office and college-level research committees. While there is no standalone public document specifically addressing external funding disclosure, faculty are expected to maintain transparency in their research activities. Oversight is typically managed at the departmental or college level. An internal document governing internal and external relationships (<https://www.kimep.kz/en/internal-and-external-relationships/>) contains limited provisions on external funding and focuses on the risk of corruption of researchers (see Sections 11 and 12)

Netherlands

University of Amsterdam has a Faculty Policy on Scientific Integrity based on the Netherlands Code of Conduct for Scientific Integrity. Researchers are to disclose ancillary activities and any activities of funders in all publications. Authors to submit ancillary positions going back 5 years. External funders to be listed explicitly and conflicts of interest to be signalled. The document refers to the Oxford University Press website for a roadmap about identifying conflict of interest.

Slovakia

Comenius University Bratislava introduced the Ethical Code in its Internal System of Quality Assurance, including rules on research and publication practice.

Relevant provisions are following:

Art. 74(2)(a): A scientific worker shall further: (a) respect and accept zero tolerance for conflicts of interest,

Art. 74(6)(e)-(f): Authors are required, depending on the field and the particular method of scientific approach to: (e) acknowledge contributions from other sources (e.g., provision of research material

and technical services), (f) declare potential sponsorship contributions and possible or actual conflicts of interest,

Art. 76

(1) Scientific researchers shall strictly maintain scientific integrity and shall not commit fraud in their creative activities and other activities related to science and research.

(...)

(3) Academic fraud is dishonest and deceitful conduct that is the opposite of research integrity and contrary to moral standards. These include plagiarism, cheating and writing off in examinations, fabrication of research results, recording fabricated data, omission of inappropriate facts and data, falsification of research, dishonest practices in the publication of results, **failure to declare conflicts of interest**, misuse of information obtained in the course of assessment, fictitious authorship, superficial and poor quality assessment, systematic and deliberate publication in journals and publishing houses that show signs of dishonest practices (journals and publishing houses that are referred to in the academic community as predatory).

Possible violations of Ethical Code are handled by Ethical councils of faculty and/or University.

Slovenia

Slovenian universities, being autonomous public institutions, have their own internal regulations that build upon the national framework. Let's take the University of Ljubljana (Univerza v Ljubljani) as an example, as it is the largest and oldest.

- **a) Statut Univerze v Ljubljani (Statute of the University of Ljubljana)**
 - **Source Document (Slovenian):** Available on the official University of Ljubljana website (uni-lj.si) under "Pravilniki in Statut" (Rules and Statute).
 - **Summary:** Similar to the University of Zagreb, the UL Statute establishes the fundamental legal and operational framework. It refers to the University's commitment to ethical principles, mandates the establishment of an Ethics Commission, and sets out general rules for financial management and activities, including those involving external parties. It underlines the University's public mission and responsibility.
- **b) Etični kodeks Univerze v Ljubljani (Code of Ethics of the University of Ljubljana)**
 - **Source Document (Slovenian):** Also found on the UL website.
 - **Summary:** This Code provides detailed ethical principles for all members of the university community.
 - **Conflict of Interest:** Explicitly addresses the need to avoid conflicts of interest, where personal interests could affect professional duties or the integrity of research. This directly applies to situations involving external funding and requires transparency and disclosure.
 - **Transparency and Disclosure:** While not listing every type of external funding to be disclosed, the principle of transparency in research and avoiding conflicts inherently requires disclosure of relevant external relationships, especially those that could influence research outcomes or professional judgment.
 - **Research Integrity:** Defines and prohibits scientific misconduct (plagiarism, fabrication, falsification, etc.) in line with national and international standards.
 - **Responsible Management of Funds:** Emphasizes responsible and transparent use of all funds.
 - **Publication Ethics:** Includes guidelines on authorship and responsible dissemination of research results, which are directly impacted by external funding sources.

- **Scope:** Like the national regulations, the UL Code of Ethics covers **all individual members** of the university community (academics, researchers, students, administration) and applies to **all units of the University** (fa

Turkey

Koc University

There are guidelines on conflicts of interest that have been adopted last semester (2024). They are very general, basically point out to the possibly applicable national law (IP law, competition law, etc.). It only contains specific rules for situations where the researcher has immediate family members in the funding private institution (corporations, etc.). It is more about disclosure to the university and acceptance of the funding rather than publication of the funded research.

United Kingdom

University of Aberdeen The University's Research Governance Handbook includes indication towards the disclosure of external funding. Researchers are required to declare any third-party funding and are supported through training and guidance on research integrity. These policies apply across the board—to individual researchers, research groups, and academic units.

More details here: <https://www.abdn.ac.uk/staffnet/research/support/research-support/research-governance/>

United States

Georgetown has comprehensive disclosure requirements. Georgetown's Financial Conflicts of Interest Policy "addresses the special obligations that those members of the University community whose research or other work is supported by external funds have to maintain the public's or a funder's trust" and "applies to all University employees." [Financial Conflict of Interest Policy | Georgetown University](#).⁴ The policy requires "all faculty and most staff to file disclosure forms annually and to update their disclosures when circumstances change." [Financial Conflict of Interest | Georgetown Research Services | Georgetown University](#). For externally sponsored research, investigators must have disclosure forms "on file" prior to proposal submission, and publications must include disclosure of "significant financial interest to the potential publisher" [C. Financial Conflicts of Interest Policy | Faculty Handbook | Georgetown University](#).

4. Do these regulations cover individual researchers only, or do they also apply research centres or Departments? If possible, please provide a summary.

Canada

Western's Manual of Administrative Policies and Procedures (MAPP)¹ 7.8 [Signing Authorities for Research Grants, Contracts and Agreements](#) designates the Office of the Vice-President (Research) (VPR) as Western's institutional signatory with the authority to sign and endorse grant applications (including reapplications), contracts, agreements and related documents on behalf of the university arising from—or related to—scholarly, research and research-oriented activities. The VPR exercises this signing authority through the oversight of Western Research - Office of Research Services. Western Research must review all research-related applications, agreements and contracts prior to recommending them for institutional signature and submission. All signatories in the approvals chain seem at least implicated in the regulations.

Croatia

Yes: the regulations at the University of Zagreb, including its Statute and Code of Ethics, are designed to cover not only **individual researchers** but also the **research centers, departments, and faculties** that constitute the University.

Here's a summary of how this broad application is achieved:

1. Institutional Governance and Accountability

- **Statute of the University of Zagreb (Statut Sveučilišta u Zagrebu):** This foundational document establishes the University as a legal entity with various constituent units (faculties, academies, and other organizational units like research centers or institutes).
 - It defines the **rights and obligations of the University as a whole**, including its financial management and the responsible use of all resources, regardless of whether they come from public or external (private) sources.
 - It **mandates the establishment of ethics committees** at both the university and often the faculty level, placing an institutional responsibility to uphold ethical standards.
 - It outlines the **responsibilities of university management** (Rector, Deans, etc.) to ensure legal and ethical compliance across all units. This means departments and centers are accountable to the Rectorate for their operations, including how they manage external funding and research.

2. Broad Scope of the Code of Ethics

- **Code of Ethics of the University of Zagreb (Etički kodeks Sveučilišta u Zagrebu):** This "soft law" document is explicitly designed to apply widely within the university system.
 - **"All members of the university community":** The Code clearly states that it applies to all individuals within the university community, including academic staff, research associates, students, and administrative personnel. This covers individual researchers directly.
 - **"All its constituent parts (faculties, departments)":** Crucially, the Code also extends its principles and requirements to the organizational units themselves. It often includes provisions that:
 - **Require faculties/departments to establish their own ethics committees** or designate responsible persons for ethical matters.
 - **Oblige these units to promote ethical conduct** among their members, educate them on the Code, and implement procedures for handling ethical issues.
 - Stipulate that **institutional actions** (e.g., procurement of research equipment, management of project funds, institutional collaborations) must adhere to the principles of transparency and avoid conflicts of interest.
 - **Conflict of Interest:** While an individual might have a personal conflict of interest, the Code also addresses situations where the **institution itself** (or a department/center) might face a conflict due to external funding. For example, if a department receives significant funding from a private company, the Code's principles would require that this relationship does not unduly influence research outcomes, curriculum development, or the rights of other researchers. The responsibility for managing and disclosing such institutional conflicts rests with the department/faculty leadership.

3. Practical Implementation and Oversight

- **Faculty-Level Rules:** As mentioned previously, individual faculties and departments often create their own more detailed internal rulebooks (pravilnik) and procedures. These build upon the university-level codes and specify how external funding is handled at their level, including:
 - **Project Approval Processes:** Departments often have internal processes for approving grant applications and contracts for externally funded projects, ensuring they align with university policies and ethical guidelines.
 - **Financial Oversight:** Financial departments within faculties or central university services often oversee the accounts for externally funded projects, ensuring funds are used transparently and according to grant agreements and national/university regulations.

- **Ethics Committees at Faculty Level:** Many faculties have their own ethics committees that review research proposals, especially those involving human subjects or sensitive data, ensuring compliance with ethical standards and institutional integrity.

In summary: The University of Zagreb's regulations on external funding and disclosure are holistic. They impose ethical duties and responsibilities on **individual researchers** to act with integrity, avoid conflicts of interest, and ensure transparency. Simultaneously, they place significant **institutional responsibilities** on faculties, departments, and research centers to create an environment that fosters ethical conduct, manages potential conflicts arising from external funding at an organizational level, and ensures adherence to all legal and ethical norms in their collective research and operational activities.

Germany

Holistic approach

Italy

The Code of Ethics is binding on all members of the academic community—including collegial bodies, faculty, researchers, and technical-administrative staff—as stated in Article 2: Scope of Enforcement.

United States

Georgetown's policy covers both individuals and institutional research activities. The policy defines "investigator" broadly as "any other person, regardless of your title or position, who is responsible for the design, conduct or reporting of research or educational activities funded by a federal government agency or other external sponsor" [Frequently Asked Questions | Financial Conflict of Interest Policy | Georgetown University](#).

5. Are you a member of any other academic society where there are regulations governing third party funding and disclosures? If yes, please provide a source document and if possible a summary.

Germany

Organisation	Regulation	Relevant paragraphs	Summary	Source
Wissenschaftliche Vereinigung für Unternehmens- und Gesellschaftsrecht	--	--	--	--
International League of Competition Law	--	--	--	--

Japan

Japan Economic Law Association, the Japan International Economic Law Association and the Japan Industrial Property Law Association, none of these have the regulation.

Slovenia

While not directly "hard law," many academic and professional societies in Slovenia adopt their own codes of ethics and conduct, which often include provisions on external funding, conflicts of interest, and responsible publication. These are primarily "soft law" and serve as a standard of professional conduct within their respective fields.

- **Example: Medical, Engineering, or Scientific Societies:**

- Many professional associations (e.g., Slovenian Medical Association, various engineering associations, societies for specific scientific disciplines) will have internal ethical guidelines for their members. These guidelines typically cover:
 - **Professional Integrity:** Upholding honesty and integrity in all professional activities, including research.
 - **Conflict of Interest:** Specific guidance on disclosing and managing conflicts of interest when collaborating with industry, accepting sponsorships, or engaging in private practice.
 - **Publication Ethics:** Standards for authorship, peer review, and avoiding misconduct in publications.
- **Source Documents:** These would be found on the respective society's official website. For example, the Slovenian Medical Association would have its "Kodeks medicinske etike in deontologije."
- **Summary:** These codes primarily apply to **individual members** of the society, setting a standard of professional conduct. While they don't legally bind research centers, they influence the ethical culture and expectations within those centers where their members are employed. They represent a collective commitment to ethical principles in a specific professional domain.

United States

The American Economics Association has a detailed disclosure policy for its journals and events. For example, the [AEA disclosure policy](#) states that:

"Disclosure Principles

Submissions to the AEA journals should conform to the AEA disclosure principles which state:

Every submitted article should state the sources of financial support for the particular research it describes. If none, that fact should be stated.

Each author of a submitted article should identify each interested party from whom he or she has received significant financial support, summing to at least \$10,000 in the past three years, in the form of consultant fees, retainers, grants and the like. The disclosure requirement also includes in-kind support, such as providing access to data. If the support in question comes with a nondisclosure obligation, that fact should be stated, along with as much information as the obligation permits. If there are no such sources of funds, that fact should be stated explicitly. An "interested" party is any individual, group, or organization that has a financial, ideological, or political stake related to the article.

Each author should disclose any paid or unpaid positions as officer, director, or board member of relevant non-profit organizations or profit-making entities. A "relevant" organization is one whose policy positions, goals, or financial interests relate to the article.

The disclosures required above apply to any close relative or partner of any author.

Each author must disclose if another party had the right to review the paper prior to its circulation.

The AEA urges its members and other economists to apply the above principles in other publications: scholarly journals, op-ed pieces, newspaper and magazine columns, radio and television commentaries, as well as in testimony before federal and state legislative committees and other agencies."

The [Stigler Center has also updated its disclosure policies for conferences](#), events, and ProMarket, aligning them with AEA and FTC requirements.

In addition, the [Federal Trade Commission has recently updated its disclosure policy](#) for events it organizes. It now requires:

“What types of circumstances should be disclosed?

- All sources of financial support for the material included in the presentation. Disclosure is required regardless of the monetary value of the support and when it was received.
- Support summing to \$10,000 received within the last three years or where there is a reasonable expectation of receiving in the future from an “interested” party. An “interested” party is any individual, group, or organization that has a financial, ideological, or political stake in topic(s) related to participation in the event. This should include any support received both directly and indirectly, including funding for centers and institutes that are material benefit to the author(s).
- Significant personal involvement or any financial support in relation to a specific matter to be addressed by the participant at the event. Employees or former employees of government agencies or consulting firms may not be able to disclose whether they worked on a specific matter but should disclose whether they worked at the agency or firm while the matter was under consideration without any indication of their own involvement in the matter.
- Any paid or unpaid positions as officer, director, or board member of any organization whose policy positions, goals, or financial interests relate to the topics associated with their participation in the event.
- If the participant is subject to a nondisclosure agreement with respect to the support in question, the participant should state that they received funding along with as much information about the interested party as allowed.
- Any third-party that had the right to review the research and/or presentation prior to its circulation.

Whose interests must be disclosed?

- The participant,
- The participant’s spouse,
- Participant’s coauthors on any presented research, and
- Spouses of any relevant coauthors.

What is considered financial support?

- Support may be in the form of in-kind data support, research grants, consulting fees, retainers, and the like.”

6. Are there any other relevant policies, regulations, guidelines, or other sources you believe may be relevant? If yes, please provide a source document, and if possible a summary.

Canada

A definition of conflict of interest is provided: “A conflict of interest may arise when activities or situations place an individual in a real, potential or perceived conflict between the duties or responsibilities related to research, and personal, institutional or other interests. These interests include, but are not limited to, business, commercial or financial interests pertaining to the individual, their family members, friends, or their former, current or prospective professional associates. (Based on Chapter 7 of the [TCPS 2 \(2018\)](#).)” Tri-Agency Framework: Responsible Conduct of Research (2021) <https://rcr.ethics.gc.ca/eng/framework-cadre-2021.html#a1>

Western University [Certification Compliance for Research Funds Policy](#)

Western University [The Framework](#) established by the [Secretariat on Responsible Conduct of Research](#)

[Tri-Agency Framework: Responsible Conduct of Research](#)

Germany

Organisation	Regulation	Relevant paragraphs	Summary	Link
All European Academies (allea)	The European Code of Conduct for Research Integrity	2.7	Authors disclose any financial and non-financial conflicts of interest as well as sources of support for the research and the publication	Link

India

The Indian Council for Medical Research, in its National Ethical Guidelines for Biomedical and Health Research Involving Human Participants, mentions that any conflicts of interest need to be mentioned. It, however, does not directly mention any third-party funding disclosure requirements. The guidelines are here: https://ethics.ncdirindia.org//asset/pdf/ICMR_National_Ethical_Guidelines.pdf

Slovenia

- **National Medical Ethics Committee (NMEC):** Slovenia has a dedicated National Medical Ethics Committee (Nacionalna komisija za medicinsko etiko) under the Ministry of Health.
 - **Source Document:** Information is available on the Ministry of Health ([GOV.SI](#)) portal.
 - **Summary:** NMEC is responsible for assessing the ethical integrity of medical practices and **biomedical research** (including drug trials). Any research involving human subjects (clinical trials, health data) in Slovenia requires approval from an ethics committee, often at the national level (NMEC) or a local medical ethics committee, depending on the nature of the research. Their opinions and approvals are legally required for such research to proceed, making them a "hard law" requirement for that specific type of research. This directly impacts external funding for biomedical research, as ethical approval is a prerequisite for project execution and publication.
 - **Scope:** Primarily applies to **individual researchers and research institutions** conducting biomedical research involving human subjects.
- **Guidelines on Research Data Management:** Slovenia is increasingly emphasizing Open Science.
 - **Source Document:** The Slovenian Research and Innovation Agency (ARIS) often provides guidelines or recommendations on research data management and open access. The "National Open Science and Open Education Action Plan" also plays a role.
 - **Summary:** These guidelines promote responsible data management (e.g., Data Management Plans - DMPs), data sharing, and open access to research publications. While not directly about funding acceptance, transparent data practices are crucial for the integrity and reproducibility of research findings, regardless of the funding source. They apply to both **individual researchers** (in how they manage their data) and **institutions** (in providing infrastructure and support for data management).

In conclusion, Slovenia has a robust and layered regulatory environment for research ethics and integrity, covering external funding and publication. This framework applies comprehensively to both individual researchers and the institutions (universities, faculties, research centers) where they conduct their work, ensuring accountability at all levels.

7. Other comments

India

A recent development concerns the rise of think tanks that have no publication ethics guidelines and there are no disclosures with respect to funding.

Annex 2: disclosure and conflict of interest policies in journals

A. Journals with disclosure policies

Journals published by Taylor & Francis (e.g. European Competition Journal)

<https://authorservices.taylorandfrancis.com/editorial-policies/competing-interest/>

Some examples of financial conflicts of interests include:

Employment or voluntary involvement

- Collaborations with advocacy groups relating to the content of the article
- Grants from an entity, paid to the author or organization
- Personal fees received by the authors as honoraria, royalties, consulting fees, lecture fees, or testimonies
- Patents held or pending by the authors, their institutions, funding organizations, or licensed to an entity, whether earning royalties or not
- Royalties being received by the authors or their institutions
- Stock or share ownership
- Benefits related to the development of products as an outcome of the work

Examples of non-financial conflicts of interests:

- Receipt of drugs, specialist equipment, tools, computer programs, or digital applications
- Access to data repositories, archival resources, museum collections, by an entity that might benefit, or be at a disadvantage financially or reputationally from the published findings
- Holding a position on the boards of industry bodies or private companies that might benefit, or be at a disadvantage financially or reputationally from the published findings
- Writing assistance or administrative support from a person or organization that might benefit, or be at a disadvantage from the published findings
- Personal, political, religious, ideological, academic and intellectual competing interests which are perceived to be relevant to the published content
- Involvement in legal action related to the work

Journal of European Competition Law & Practice

https://academic.oup.com/jeclap/pages/General_Instructions;

The submission should include references to the affiliation of the authors (typically, this will be the law firm, the consulting firm and/or the academic institution for whom the authors work) and should clarify whether they have any potential conflicts of interest. In this sense, authors should disclose any sources of funding or in-kind support received in the context of the preparation of an article. Similarly, they should also disclose any on-going relationships (such as a consulting relationship) with an interested party, even if not directly related to the topic of the paper. Finally, whether an interested party had the right to review the manuscript prior to submission should be acknowledged.

An 'on-going relationship' is understood to be one in which an individual author (or the organisation to which she belongs) expects to receive financial compensation or any other form of support in the future. An 'interested party' is one that has a stake in the issues discussed in the article.

Authors should also include in the submission any affiliation with a centre, institute or organisation that receives funding or in-kind support (such as access to data or information that is not in the public domain) from an interested party, irrespective of whether the party in question has funded paper in question.

The above is to be disclosed in the published version of the piece. If there is nothing to disclose, authors should point this out explicitly.

Kluwer (World Competition and Common Market Law Review)

https://kluwerlawonline.com/media/KLI_Publication_Ethics_Malpractice_Statement.pdf

We define a conflict of interest as a conflict between an author's private interests and his or her responsibilities to scientific and publishing activities.

All authors should disclose in their manuscript any financial and personal relationships with other people or organizations that could be viewed as inappropriately influencing (bias) their work to prevent a reasonable observer to wonder if the author's behavior or judgment was motivated by a conflict of interest

European Law Review

<https://www.sweetandmaxwell.co.uk/content/dam/ue/en-gb/documents/pdf/other/european-law-review-guide-for-contributors.pdf>

Where a contribution advances an argument which might be perceived as serving the interests of someone for whom the author acts in a professional capacity, or with whom the author has a commercial connection, an appropriate declaration should be added to the biographical information supplied.

Journal of Antitrust Enforcement

https://academic.oup.com/antitrust/pages/General_Instructions.

Acknowledgements and details of non-financial support must be included in the first footnote on the Title Page. Personal acknowledgements should precede those of institutions or agencies. In the interest of transparency authors are required to clearly indicate any third-party funds that have contributed to their research or the writing of the article. Additionally, authors should indicate any other potential conflict of interests; for example, whether they have consulted or worked for any of the parties to the cases discussed in the paper (as a consultant, lawyer or employee), or whether the firm or organization to which they are affiliated represents or represented companies which are affected by the paper. This information should be clearly disclosed in the first footnote of the paper, for example in the following manner: 'The author has worked as a consultant to ... / grateful for financial support received by ... / the research has been supported by ... / The author represented x in ... / The author is affiliated to firm x which represented ...'.

Antitrust Law Journal

"Potential conflicts of interest. The ALJ is a forum for sharing ideas with lawyers, economists, judges, policymakers, and academics. It is not a forum for advancing the interests of clients or sponsors. Accordingly, upon submission of an article, authors will be required to answer a brief questionnaire regarding involvement in legal proceedings, funding, and other financial or working relationships. If the article is accepted for publications, all relevant disclosures must be made in the article's biographical footnote."

https://www.americanbar.org/groups/antitrust_law/resources/journal/guides-for-authors-editors/

Antitrust Bulletin

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The journal requires a declaration of conflicting interests from all authors so that a statement can be included in your article. For guidance on conflict of interest statements, see our [policy on conflicting interest declarations](#) and the [ICMJE recommendations](#).

If no conflict exists, your statement should read: 'The author(s) declared no potential conflicts of interest with respect to the research, authorship, and/or publication of this article'.

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<https://journals.sagepub.com/author-instructions/ABX>

Yearbook of Antitrust and Regulatory Studies (YARS)

https://press.wz.uw.edu.pl/yars/publication_ethics.html

YARS follows guidelines set in the ASCOLA Transparency and Disclosure Declaration. Therefore, the author(s) should disclose the contribution of research institutions, associations, and other entities and any potential conflicts of interest that may affect the analysis or the results. The author(s) should also disclose all sources of financial support in their manuscript.

Journal of Competition Law and Economics

OUP-wide policy

What is a 'Conflict of Interest'?

Any financial interests or connections, direct or indirect, or other situations that might raise the question of bias in the work reported or the conclusions, implications or opinions stated – including pertinent commercial or other sources of funding for the individual author(s) or for the associated department(s) or organization(s), personal relationships, or direct academic competition.

How can I be sure if I should declare something?

Please consider the following Conflict of Interest test: is there any arrangement that would compromise the perception of your impartiality or that of your co-authors if it was to emerge after publication and you had not declared it?

Who should make the declaration?

The corresponding author is expected to obtain the relevant information from all co-authors.

How should the declaration be made?

Most journals require a declaration of any Conflict of Interest to be included in the manuscript upon submission. This information will be available to the Editors. If your manuscript is published, this information will be communicated in a statement in the published paper.

Depending on the journal, you may also be asked to submit signed Conflict of Interest form(s) if your article is accepted for publication.

In both cases the corresponding author has to be in a position to report for all co-authors.

What happens if I do not know about any potential Conflict of Interest for my co-authors?

On submission any potential Conflict of Interest should be clearly stated for each author – the Editors reserve the right to require further information before the paper is reviewed. As corresponding author it is your responsibility to confirm with your co-authors whether they have any conflicts to declare. If you are unable to do this you will need to co-ordinate the completion of written forms from all co-authors, and submit these to the editorial office before the manuscript can be processed.

Are referees and editors covered by a similar code?

All referees are either asked to decline to review a manuscript if they have a potential conflict or declare any potential conflict.

All Editors have submitted a Conflict of Interest statement to the publisher or society. Editors would not handle the review of a manuscript if there was a potential Conflict of Interest, and instead would pass it on to another editorial colleague.

Journals in Germany (selection)

[WuW](#) has a good paragraph on disclosure.

[ZWeR](#) is very weak (and even allows the outdated phrase “This contribution was inspired by practice”).

[NZKart](#) has something on disclosure, but not as concrete as WuW.

B. Journals where no provisions for disclosures were found

European Competition and Regulatory Law Review does not have provisions dealing with authors’ conflict of interest.

Competition Policy International has no information on its website.

European Competition Law Review has no information for authors on its website.

C. Guidelines for reviewers

Journals member of the **Committee on Publication Ethics (COPE)** have some rules for referees

<https://publicationethics.org/guidance/guideline/ethical-guidelines-peer-reviewers>

- Please consult the Editor if you have a potential conflict, or decline this invitation if you have a known conflict, with the author(s) and/or the content itself.