

Rules for Resolving Conflicts of Interest at the University of Hradec Králové

PART I

Basic provisions

As an institution that receives public and other funds, the University of Hradec Králové (hereinafter referred to as the “*UHK*”) is required to meet the highest standards of corporate governance. In addition, members of the University are legally required to act in the best interests of the University and avoid situations that could harm the University. Employees, students and other persons cooperating with the University may from time to time find themselves in situations where there are actual or potential conflicts of interest of a financial, ethical, legal or other nature between their personal and professional interests and their university duties.

Conflicts that are properly managed generally allow managed activities to proceed normally while protecting the integrity and reputation of both individuals and the University. Actual, potential, or perceived conflicts that are not managed can damage the integrity and reputation of the University and the individuals involved. It is therefore in the interest of all parties concerned to establish rules that will enable recording, management, and effective resolution of conflict situations.

Article 1

Introductory provisions

- 1) This directive defines the rules for resolving conflicts of interest (hereinafter referred to as the “*Rules for Resolving Conflicts of Interest*”) at the UHK that fall within the self-governing competence of a public university within the meaning of Section 6 of Act No. 111/1998 Sb., on higher education institutions and on amendments and supplements to other acts (the Higher Education Act), as amended (hereinafter referred to as the “*Higher Education Act*”).
- 2) The UHK has decided to adopt these Rules for Resolving Conflicts of Interest as employees, students and other persons cooperating with the UHK may from time to time find themselves in situations where real or potential conflicts of interest of a financial, ethical, legal or other nature arise between their personal and professional interests and their university duties.

- 3) As an institution that manages public and other entrusted funds, the UHK is required to meet the highest standards of corporate governance. Employees, students and other persons cooperating with the UHK are obliged to act in the best interests of the UHK and to prevent situations that could damage the reputation of the UHK or cause harm (e.g. damage) to the UHK.
- 4) The UHK also aims to ensure that the studies of students at the UHK are fair, non-discriminatory, non-preferential and transparent, and conflicts of interest may undermine this goal.
- 5) The Rules for Resolving Conflicts of Interest therefore define, in particular, the rules for preventing, identifying and resolving conflicts of interest at the UHK. The purpose is to ensure the transparency, integrity and proper administration of the UHK, to minimise the impact of conflicts of interest on academic and administrative activities, and to maintain public confidence in the academic environment at the UHK.
- 6) These Rules for Resolving Conflicts of Interest apply to all UHK employees, UHK students, members of academic bodies, members of evaluation and advisory committees, persons involved in the management of projects financed from public or other sources, and other persons working within the UHK who may be subject to a conflict of interest, regardless of whether they or third parties may benefit from the conflict of interest.
- 7) These Rules for Resolving Conflicts of Interest supplement the obligations arising from Act No. 159/2006 Sb., on conflicts of interest, as amended (hereinafter referred to as the “*Conflict of Interest Act*”) and other related legal regulations. In the event of a conflict, the legal regulations take precedence over these Rules for Resolving Conflicts of Interest.

Article 2

Basic terms and definitions

For the purposes of these Rules for Resolving Conflicts of Interest, the UHK defines the following terms and definitions:

- 1) **Close Person** means, within the meaning of Section 22 of Act No. 89/2012 Sb., the Civil Code, as amended, a direct relative, sibling, and spouse or partner under another law governing registered partnerships; other persons in a family or similar relationship are considered to be persons close to each other if the harm suffered by one of them would reasonably be felt by the other as harm to themselves. Persons who are related by marriage or persons who live together permanently are also considered to be Close Persons.

- 2) **Person in a Similar Position** means, in particular, a person in above-standard business or working relationships, or in any other similar relationship, whose relationship could influence decision-making in matters concerning the UHK.
- 3) **Closely Cooperating Person** means a person who is a co-author of a publication, or a cooperating person on a project/grant within the last 5 years, even outside the UHK.
- 4) **Member of the UHK** means all UHK employees, members of academic bodies, members of evaluation and advisory committees, persons involved in the management of projects financed from public or other sources, and other persons working within the UHK.
- 5) **Student of the UHK** means a student in a Bachelor's, Master's or doctoral programme or an applicant in an advanced Master's (rigorosum) procedure, procedure to grant associate professorship or procedure for appointment as a professor, including those engaged in life-long learning.
- 6) **Conflict of Interest** means a situation in which a Member of the UHK or a Student of the UHK is a Close Person to another person, a Person in a Similar Position or a Closely Cooperating Person, where the personal or professional interests and relationships of these persons may affect objectivity or impartiality, and also a situation where the personal or professional interests of a Member of the UHK or a Student of the UHK conflict with the interests of the UHK.
- 7) **Kind of a Conflict of Interest** means the following three degrees of Conflict of Interest:
 - a) **Perceived Conflict of Interest** is a Conflict of Interest that a reasonable person would consider to be a threat to their objectivity and impartiality;
 - b) **Potential Conflict of Interest** is a Conflict of Interest that could develop into an Actual or Perceived Conflict of Interest in the future;
 - c) **Actual Conflict of Interest** is a Conflict of Interest that is factual and indisputable (i.e. the Conflict of Interest does exist).
- 8) **A Person in a Conflict of Interest** means a Member of the UHK or a Student of the UHK who is in a position of a Close Person, a Person in a Similar Position or a Closely Cooperating Person to another person, and a Conflict of Interest may arise or is arising between these persons.

PART II

Procedure for resolving Conflicts of Interest

Transparency, equal access and equal treatment are the primary requirements for resolving Conflicts of Interest, and it is essential to ensure that all activities and decision-making processes are carried out independently, impartially and exclusively in the legitimate interests of the UHK. Conflicts of interest, whether Perceived, Potential or Actual, pose a risk of compromising the objectivity of decision-making and may undermine confidence in the fair and responsible functioning of the UHK.

For this reason, it is necessary to establish a clearly defined and comprehensible procedure for identifying, recording, evaluating, taking measures and subsequent monitoring situations that could lead to a Conflict of Interest. Such a procedure contributes to preventing undesirable influences on decision-making processes and to protecting the integrity of individuals and the entire UHK.

Article 1

Procedure for resolving Conflicts of Interest

- 1) The UHK establishes the following binding procedure for resolving Conflicts of Interest:
 - a) Identification of Conflicts of Interest;
 - b) Entry in the Conflict of Interest Register;
 - c) Assessment of the Conflict of Interest ;
 - d) Adoption of measures in accordance with these Rules;
 - e) Follow-up review.
- 2) The Members of the UHK and Students of the UHK are obliged to continuously monitor their own Conflicts of Interest and to properly identify and report them to the UHK, i.e. the Members of the UHK and Students of the UHK in particular monitor and identify Close Persons, Persons in a Similar Position and Closely Cooperating Persons.
- 3) The Members of the UHK and Students of the UHK are obliged to report any potential Conflict of Interest involving another Member of the UHK or Student of the UHK to the UHK, specifically to the authority responsible for the Conflict of Interest Register.

- 4) When entering into any relationship with the UHK, the Members of the UHK are required to complete a Conflict of Interest disclosure form and submit it to the Conflict of Interest Register. The Members of the UHK shall continuously update their Conflict of Interest disclosures (i.e. if a previous Conflict of Interest has ceased to exist or a new Conflict of Interest has arisen).
- 5) The UHK shall assess Conflicts of Interest reported by the Members of the UHK and Students of the UHK and take appropriate measures in accordance with these Rules for Resolving Conflicts of Interest.
- 6) Every two years, the UHK shall assess whether there had been a Conflict of Interest within the UHK, how the Conflict of Interest was dealt with in accordance with these Rules for Resolving Conflicts of Interest, and, in the event of reasonable doubts about the correctness of the procedure, shall carry out a thorough review.

Article 2

Conflict of Interest Register

- 1) The UHK establishes a Conflict of Interest Register which is a non-public register recording the Members of the UHK, as well as other facts specified below by these Rules.
- 2) The Rector of the UHK shall also appoint an authority responsible for maintaining the Conflict of Interest Register.
- 3) The Conflict of Interest Register shall be accessible to the Rector, the authorized representative of the Rector, the Deans, the authorized representatives of the Deans, the UHK data protection officer, the UHK ombudsperson, the chair of the Ethics Committee, the responsible authority for receiving reports of unlawful conduct (whistleblowing), and the internal auditor.
- 4) The Members of the UHK are required to fill in a Conflict of Interest record in the Conflict of Interest Register and update it on an ongoing basis, at least once per academic year.
- 5) The following information about Conflicts of Interest will be recorded in the Conflict of Interest Register:
 - a) First name, surname, date of birth of the Member of the UHK as a person in a Conflict of Interest;
 - b) First name, surname, date of birth of a Close Person/person in a Similar Position/Closely Cooperating Person;

- c) The activities of a Member of the UHK in a legal entity; the business activities of a Member of the UHK; other employers of a Member of the UHK;
 - d) Detailed specification of the Conflict of Interest ;
 - e) Other information necessary or appropriate for resolving the Conflict of Interest;
 - f) Measures taken in accordance with these Rules;
 - g) Information on the follow-up check carried out;
 - h) Identified violations of these Rules;
 - i) Corrective measures taken.
- 6) A person with a legal interest in the matter may submit a written request to the Rector of the UHK, via the authority responsible for maintaining the register, to grant them permission to inspect the Conflict of Interest Register. In the written request, the person with a legal interest in the matter must certify this legal interest. The Rector of the UHK shall decide on the request in writing and is not obliged to grant access. The decision on the request shall be justified.
- 7) Any person may submit a complaint to the UHK Ethics Committee requesting that it investigate whether a Conflict of Interest has occurred or could occur. The Ethics Committee shall review the complaint and, if it concludes that the complaint is justified, the Ethics Committee shall take measures in accordance with these Rules for Resolving Conflicts of Interest.

Article 3

General resolution of conflicts of interest

- 1) Conflicts of interest shall be resolved on a case-by-case basis in accordance with Part III of these Rules. If a Conflict of Interest arises that cannot be resolved by the measures set out in Part III of these Rules, the procedure set out in this Article of the Rules shall apply.
- 2) The authority responsible for maintaining the Conflict of Interest Register shall submit any identified and recorded Conflict of Interest to the appropriate responsible authority, as follows:
 - a) To the Rector of the UHK, or an authorized representative, if the matter falls within the competence of the University;

- b) To the Dean of the relevant UHK faculty or an authorized representative, if the matter falls within the competence of the faculty.

The responsible authority shall then take the necessary measures for the specific case to ensure the highest level of protection against conflicts of interest in accordance with these Rules.

- 3) The measures taken in accordance with the previous point of this Article of the Rules include, in particular:
 - a) The exclusion of the Student of the UHK or the Member of the UHK from the matter in question;
 - b) Supervision of the matter by another Member of the UHK;
 - c) Supervision of the matter by a third (external) party.
- 4) The responsible authority shall inform the authority responsible for maintaining the Register of the measures taken in accordance with the previous point of these Rules, and the latter shall record the measures taken in the Conflict of Interest Register.
- 5) At the same time, the responsible authority shall set the conditions and deadlines for follow-up checks that shall also be recorded in the Conflict of Interest Register by the authority responsible for maintaining the Register.

PART III

Individual areas and resolution of conflicts of interest

Article 1

Areas of Conflict of Interest

- 1) Within the UHK, conflicts of interest may arise in several possible areas, namely in relation to:
 - a) Studies;
 - b) Employment or similar relationships, including remuneration;
 - c) Voting in the UHK bodies;
 - d) Commercial relationships;
 - e) Other areas of the UHK activity not expressly mentioned;and all areas of Conflict of Interest shall be regulated by these Rules.

Article 2

Conflict of Interest related to studies

- 1) This area covers any situations arising from a serious interest in studying (e.g. admission procedures) or occurring during the course of study (e.g. examinations, allocation of grants, selection for mobility programmes, recognition of studies), as well as situations directly related to these. In such cases, one party is an applicant for study at the UHK or a UHK student, and the other party is another Member of the UHK, excluding students and applicants.
- 2) In the event of a Conflict of Interest **within the admissions procedure**, the UHK establishes the following procedure for resolving Potential Conflicts of Interest:
 - a) A Person in a Conflict of Interest with an applicant for study at the UHK will be replaced by another Member of the UHK, provided that the same or comparable expertise and quality of the admissions procedure is maintained.
 - b) If it is not possible to proceed according to the previous point, a three-member admission committee will be appointed to oversee the proper conduct of the applicant's admission procedure. In this case, the Person in a Conflict of Interest will be the (third) member of the committee only as a guarantor of the expertise and quality of the admission procedure and will therefore only have an advisory vote.
 - c) The above applies only to situations where the admission procedure (or part thereof) is conducted orally or on the basis of a test with open-ended questions. In the case of an admission procedure in the form of a test with closed-ended questions, it is not necessary to apply the measures set out in these Rules for Resolving Conflicts of Interest.
- 3) In the event of a Conflict of Interest **in the examination and assessment** of students, the UHK establishes the following rules for resolving potential conflicts of interest:
 - a) **Important examinations and procedures.** In the context of state final examinations, rigorosum examinations, associate professor's or professors's appointment procedures, a Person in a Conflict of Interest with a Student of the UHK will be replaced by another Member of the UHK or a third (external) person working outside the UHK, provided that the same or comparable expertise and quality of final examinations, rigorosum examinations, associate professor's or professors's appointment procedures is maintained.

- b) **Standard examinations and assessments.** In the course of routine examinations or assessments in Bachelor's or Master's degree programmes, a Person in Conflict of Interest with a Student of the UHK will be replaced by another Member of the UHK who has sufficient expertise and is qualified to conduct examinations or assessments of the Student of the UHK.
 - c) **Exception to the procedure under letter b).** If, for serious reasons, it is not possible to proceed in accordance with the previous letter of this point of the Rules, a third person appointed by the Dean or Vice-Dean of the relevant faculty of the University of Hradec Králové shall supervise the person in Conflict of Interest and the course of the examination or assessment. The third (supervising) person must reach the same conclusion as the person in Conflict of Interest when assessing or examining, i.e. both persons must assess the student in the same way. If the third (supervising) person and the Member of the UHK disagree on the result of the examination or assessment, the conclusion of the third (supervising) person shall be binding. The person in Conflict of Interest or the Student of the UHK may object to this conclusion, in which case the examination or assessment will be repeated with the participation of a three-member committee composed of the Members of the UHK. In such case, the person in Conflict of Interest will be the (third) member of the committee acting only as a guarantor of the expertise and quality of the admission procedure and will therefore have only an advisory vote.
 - d) **Recognition of subjects, scholarships and other matters.** In the event of a Conflict of Interest in the recognition of subjects, the awarding of scholarships and other situations not mentioned above within the framework of studies, matters shall be assessed by a Member of the UHK other than the person in Conflict of Interest . If the person in Conflict of Interest cannot be replaced by another Member of the UHK, then a third (supervising) person from among the Members of the UHK appointed by the Dean or Vice-Dean of the relevant faculty of the UHK shall supervise the assessment of the matter. The procedure under point 3(d) of the Rules shall apply mutatis mutandis in this case as well.
- 4) In case of doubt about the equal or comparable expertise of another Member of the UHK, the decision shall be made by the Rector of the UHK upon a written request from the person in Conflict of Interest, the Student of the UHK directly affected by this decision, or the relevant Dean or Vice-Dean. The decision on the request shall be justified.

- 5) In case of doubt as to the correctness of decisions made in accordance with this article of the Rules for Resolving Conflict of Interest, a three-member committee appointed by the Rector of the University of Hradec Králové shall decide upon a written request from the person in Conflict of Interest or the person directly affected by the decision. The person in Conflict of Interest may not be a member of this committee, but the committee shall request their opinion on the matter if it is necessary for the decision. The decision on the request shall be justified.

Article 3

Conflict of Interest related to employment or similar relationship

- 1) This area of Conflict of Interest concerns situations where a Conflict of Interest may arise when entering into an employment or similar relationship with the UHK, or when deciding on the hiring of a new employee or collaborator. This category also includes decisions on career advancement or remuneration of employees or collaborators. These matters are decided by the Rector or Dean of the relevant faculty.
- 2) In the event of a Conflict of Interest arising from employment or similar relationship, the UHK establishes the following procedure for resolving potential Conflicts of Interest:
 - a) **Making of an employment or similar contract.** When making an employment or similar contract (including a selection procedure) with a person with whom the Rector of the UHK or the Dean of the relevant UHK faculty is in a Conflict of Interest, the decision on the admission of such a person shall be made by the authorized representative of the Rector or Dean of the relevant UHK faculty.
 - b) **Career advancement.** In the event of a Conflict of Interest involving the Rector of the UHK or Dean of the relevant UHK faculty when deciding on the career advancement of a Member of the UHK, the decision shall be made by the authorized representative of the Rector or Dean of the relevant UHK faculty.
 - c) **Remuneration.** In the event of a Conflict of Interest involving the Rector of UHK or the Dean of the relevant UHK faculty when deciding on the remuneration of a Member of the UHK, the decision shall be made by the authorized representative of the Rector or Dean of the relevant UHK faculty. In the event of a Conflict of Interest in remuneration within the framework of grants or projects, the remuneration shall be co-signed by the Rector or Dean of the relevant UHK faculty, or their authorized representative, together with the person in Conflict of Interest.

- 3) In case of doubt as to the correctness of decisions made in accordance with this article of the Rules, a three-member committee appointed by the Rector of the UHK shall decide upon a written request from the person in Conflict of Interest or the person directly affected by the decision. The person in Conflict of Interest may not be a member of this committee, but the committee shall request their opinion on the matter if it is necessary for the decision. The decision on the request shall be justified.

Article 4

Conflict of Interest related to voting in UHK bodies

- 1) This area of Conflict of Interest includes situations where a person in Conflict of Interest who is a member of a decision-making, advisory or other body of the UHK votes or otherwise participates in a decision that may affect their personal, family, property or other interests, or the interests of persons or entities with whom they have a close relationship.
- 2) When a UHK body votes on matters of Conflict of Interest, a person in Conflict of Interest is not entitled to vote and is also excluded from collective discussion so that they cannot influence other members of the body, provided that the UHK body in question does not allow substitutes.
- 3) If the relevant UHK body allows for substitutes, a person in Conflict of Interest who is member of the relevant UHK body will not only refrain from participating in the discussion on the matter in question, but will also refrain from voting. In such cases, the person in Conflict of Interest will be replaced by a substitute.
- 4) In case of doubt as to the correctness of decisions made in accordance with this article of the Rules for Resolving Conflict of Interest, a three-member committee appointed by the Rector of the UHK shall decide upon a written request from the person in Conflict of Interest or the person directly affected by the decision. The person in Conflict of Interest may not be a member of this committee, but the committee shall request their opinion on the matter if it is necessary for the decision. The decision on the request shall be justified.

Article 5

Conflict of Interest related to commercial relations

- 1) This area of Conflict of Interest encompasses all commercial relationships, including public procurement, as defined below in this text, as well as the specific conflict situations that may arise as a result of a Conflict of Interest.
- 2) If a Member of the UHK also works for a legal entity (e.g. as a partner or member of an authorized representative), or is self-employed, or is employed by a third party other than the UHK, and the UHK cooperates with such legal entity, self-employed person or employer of the Member of the UHK, the following conflicts may arise in particular:
 - a) **Economic benefit**, where a person in Conflict of Interest can influence the situation in such a way that they or a third party derive economic benefit from it;
 - b) **Unfair advantage**, where a person in Conflict of Interest can influence the situation by adjusting the conditions of the tender so that a third party best meets the requirements and conditions of all participants in the tender;
 - c) **Threat to impartiality**, where a person in Conflict of Interest may influence the situation regardless of economic benefit or unfair advantage;
 - d) **Unclear responsibility**, where a person in Conflict of Interest may influence the situation with regard to their responsibility towards the UHK and, at the same time, towards a third party in which they operate.
- 3) Within the UHK, a Conflict of Interest in this area may arise in particular in the following situations that will be addressed using the procedure described below:
 - a) **Private business activities of the Members of the UHK.** Any Member of the UHK who wishes to engage in business activities, or who already does so, is required to draw up a **declaration of their business activities** and enter this information in the Conflict of Interest Register. In cases required by applicable law, the Members of the UHK must obtain the written consent of the UHK for their business activities.
 - b) **Submission and evaluation of projects.** A Member of the UHK cannot be a member of a committee that assesses and evaluates a particular project if there is a Conflict of Interest. In such a case, the Rector of the UHK shall replace this member of the committee with another Member of the UHK.

In case of projects that are not decided by a committee but by a single Member of the UHK (e.g. the Rector, Dean, Vice-Dean, Vice-Rector), who is, however, a person in Conflict of Interest in such a decision, the Rector of the UHK shall appoint a person to supervise the proper submission and evaluation of such a project. In the event of a dispute between the relevant person and the supervising person, the conclusion of the supervising person shall prevail.

- c) **Participation of a person in Conflict of Interest in a grant/project together with a person in whose business they are involved.** A person in Conflict of Interest who intends to participate in a grant or project together with a person in whose business they are involved is obliged to provide the UHK with employment or other similar contracts for the purpose of checking for Conflict of Interest, in particular to determine whether the activities of the person in Conflict of Interest in the areas of research and publishing overlap, so that no doubts arise in the future about the appropriateness of property rights to intellectual property. If there is any uncertainty regarding these rights, the UHK shall take such measures (e.g. shall make a contract) to clarify the rights of the parties in order to protect the interests of the UHK to the greatest extent possible. A person in Conflict of Interest is obliged to inform the UHK of the results falling within the field of research relating to intellectual property rights in the broadest sense. To this end, an annual written evaluation of the cooperation between the parties shall be carried out in order to verify that there is no undue advantage to one of the parties or threat to the activities of the UHK. These facts must be defined in advance in the relevant contractual documentation between the UHK and the legal entity/natural person engaged in business.
- d) **Participation of a person in Conflict of Interest in a grant/project together with a person in whose business they intend to participate.** A person in Conflict of Interest who will participate in a grant/project together with a person in whose business they intend to participate is required to obtain prior written consent from the UHK for their participation in the business for a period of 5 years from the date of termination of the grant/project. A person in Conflict of Interest is obliged to provide the UHK with all necessary information and documents requested by the UHK for the purpose of obtaining consent in order to prevent damage to the interests of the UHK.
- e) **Public procurement.** Conflicts of Interest are resolved in accordance with the current Rector's decree on public procurement and the current Public Procurement Act, including related legislation.

f) **Cooperation between the UHK and legal entities/natural persons engaged in business activities on improving technology (licences).** The parties shall inform each other about submitted applications for inventions, utility models, as well as publishing activities or other similar activities related to results falling within the scope of research concerning intellectual property rights in the broadest sense, for which the UHK has granted a legal entity/natural person rights to use through a licence, and shall cooperate in resolving any disputes in the field of intellectual property. To this end, an annual written evaluation of the cooperation between the parties shall be carried out in order to verify that there is no undue advantage to one of the parties or threat to the activities of the UHK. The licence fee will also reflect the partial costs of research and development, taking into account future increases in the licence fee under predetermined conditions. In case of uncertainty regarding the amount of the licence fee, it will be determined on the basis of an expert opinion or expert assessment.

g) **Acquisition of property rights from the UHK by a person in Conflict of Interest or a person in whose business a person in Conflict of Interest participates.** In cases where property rights are to be transferred from the UHK to a person in Conflict of Interest or a person in whose business a person in Conflict of Interest participates, the procedure will be carried out with the utmost transparency and caution. The UHK reserves the right to require proof of transfer conditions comparable to those customary in similar business cases, including proof of the market value of the rights in question by means of an expert opinion or expert assessment.

Prior to the transfer, the parties shall be obliged to assess in writing the transfer of property rights from the perspective of a possible Conflict of Interest in order to verify that there is no undue advantage to one of the parties or threat to the activities of the UHK, and the UHK shall be entitled to request an independent assessment of the contractual terms and conditions by a third party.

4) In case of doubt as to the correctness of decisions made in accordance with this article of the Rules for Resolving Conflict of Interest, a three-member committee appointed by the Rector of the UHK shall decide upon a written request from the person in Conflict of Interest or the person directly affected by the decision. The person in Conflict of Interest must not be a member of this committee, but the committee shall request their opinion on the matter if it is necessary for the decision. The decision on the request shall be justified.

PART IV

Penalties and monitoring of corrective measures

Violations of the obligations set out in these Rules for Resolving Conflicts of Interest in connection with Conflicts of Interest shall be assessed with regard to the severity of the specific conduct, its impact on decision-making processes and the possible threat to the activities, reputation and transparency of the UHK. However, the penalty for the breach itself must also be monitored and evaluated. For this reason, the corrective measures taken will be monitored.

Article 1

Penalties for violations

- 1) In the event of a breach of these Rules for Resolving Conflicts of Interest **by a Member of the UHK**, the UHK shall take the following measures, depending on the seriousness of the breach:
 - a) **Minor violation.** If a Member of the UHK fails to fulfil their obligation under Article 2 of these Rules for Resolving Conflicts of Interest, they will receive a written warning from the UHK with a request to fulfil their obligation within an additional period of 15 days.
 - b) **Repeated minor violations.** If a Member of the UHK repeatedly (i.e. twice or more times) fails to fulfil their obligation under Article 2 of these Rules for Resolving Conflicts of Interest, or fails to fulfil their obligation within an additional period even after being requested to do so under point (a) of this paragraph, the UHK shall draw conclusions from such a breach in accordance with the applicable legal regulations (e.g. termination of employment) or shall terminate the UHK's cooperation with such a Member of the UHK.
 - c) **Serious violation.** In a situation where a Member of the UHK violates Article 3 of Part II of these Rules for Resolving Conflicts of Interest or violates Part III of these Rules for Resolving Conflicts of Interest, the UHK shall draw conclusions from such a violation in accordance with applicable legal regulations (e.g. termination of employment), or shall terminate the UHK's cooperation with such a Member of the UHK.

- 2) In the event of a breach of these Rules for Resolving Conflicts of Interest **by a Student of the UHK**, the following measures will be taken depending on the severity of the breach:
 - a) **Minor violation.** If a Student of the UHK fails to fulfil their obligation under Article 2 of these Rules for Resolving Conflicts of Interest, they will receive a written warning from the UHK with a request to fulfil their obligation within an additional period of 15 days.
 - b) **Repeated minor violations.** If a Student of the UHK repeatedly (i.e. twice or more times) fails to fulfil their obligation under Article 2 of these Rules for Resolving Conflicts of Interest, or fails to fulfil their obligation within the additional period even after being requested to do so under point (a) of this paragraph, the UHK shall initiate disciplinary proceedings against the Student of the UHK, which may result in the student's expulsion from the UHK.
 - c) **Serious violation.** If a Student of the UHK violates Article 3 of Part II of these Rules for Resolving Conflicts of Interest or violates Part III of these Rules for Resolving Conflicts of Interest, the UHK shall initiate disciplinary proceedings against the Student of the UHK, which may result in the student's expulsion from the UHK.
- 3) Points 1 and 2 of this article of the Rules do not exclude the liability of a Member of the UHK or a Student of the UHK on the grounds of civil, administrative or criminal liability under applicable law.

Article 2

Review of corrective measures

- 1) Every two years, the UHK shall assess whether corrective measures have been taken in accordance with Article 1, Part IV of these Rules for Resolving Conflicts of Interest. The assessment shall focus in particular on whether individual violations have been properly identified, addressed and punished in accordance with these Rules for Resolving Conflicts of Interest.
- 2) The evaluation referred to in the previous point will be carried out by the independent Internal Audit Office, in the form of an assurance audit of the Conflict of Interest prevention and resolution system. The authority responsible for maintaining the Conflict of Interest Register shall evaluate the corrective measures and make an entry in the Register.

- 3) If the Internal Audit Office finds that proper corrective measures have not been taken in accordance with Article 1, Part IV of these Rules for Resolving Conflicts of Interest, they shall immediately notify the Rector of the UHK, who shall subsequently decide on corrective measures in accordance with these Rules for Resolving Conflicts of Interest and applicable legislation.

PART V

Final provisions

- 1) These Rules for Resolving Conflicts of Interest were discussed 10. 12. 2025.
- 2) These Rules for Resolving Conflicts of Interest shall enter into force on 30. 12. 2025.
- 3) These Rules for Resolving Conflicts of Interest shall take effect on the first day of the calendar month following the date on which they entered into force. The rules concerning the Conflict of Interest Register and entries in this Register shall take effect on 1 July 2025.

In Hradec Králové on 30. 12. 2025.

Assoc. prof. RNDr. Jan Kříž, Ph.D.
Rector