Japanese Cancer Association Conflict of Interest Policy in Cancer Research

Version 3 (Created September 2018)

Japanese Cancer Association

Conflict of Interest Committee

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Foreword

The purpose of JCA is to contribute to the development of cancer research and to the public well-being. The research presented via the JCA's academic conferences and publications includes cancer biology, diagnostics, therapeutics, and other areas that are highly specialized and closely related to one another. Collaboration between academia (including research institutes as well as universities) and industry (including medical and pharmaceutical manufacturers, business ventures, and other for-profit corporations) is an effective way to promote such research in a unified manner and contribute to improving cancer prevention, diagnosis, and treatment.

In some cases, industry-academic collaborative cancer research entails benefits to society (public interest) from the fruits of discharging academic and ethical responsibility, as well as money, status, rights, and other benefits (private interest) acquired attendant on industry-academic collaboration. When these two types of benefit are in conflict within an individual researcher, it is called a "conflict of interest." In cancer research, a researcher who has invented a diagnostic or therapeutic method frequently becomes involved in the commercialization of that method by a for-profit corporation. The occurrence of conflicts of interest is unavoidable, and this in itself is not a problem.

Nevertheless, in cases of serious conflicts of interest, the researcher may be greatly influenced by personal gains, and the risk of distortion of research methods, data analysis or result interpretation arises. A situation may also occur whereby fair assessment is not made, even though research findings are appropriate. When research findings are presented at annual meetings and the like, there may be an intentional failure to report specific data (reporting bias). At the same time, if fairness and objectivity are not secured, even industry-academic collaboration that does not involve any serious conflict of interest may create suspicion and anxiety in society and also disadvantage the researcher.

In response, many academic societies in Europe and North America have established conflict of interest guidelines covering clinical research to ensure appropriate conduct in industry-academic collaborative clinical research and impartiality in academic presentations. In the United States, the Sunshine Provisions of the Patient Protection and Affordable Care Act (March 2010) legally require pharmaceutical and medical device companies to disclose all payments made to physicians and medical institutions, etc. and the content of these provisions has been available on the website since 2013.

In recent years, against a backdrop of increasingly globalized initiatives, research and development activities concerning the prevention, diagnosis, and treatment of cancer have been actively pursued on the basis of Japanese, North American, and European joint research, and conflict of interest management systems have been established in Japan. One of the trailblazers in this area is the Guidelines on the Development of Conflict of Interest Policies for Clinical Research, published in March 2006 by the Ministry of Education, Culture, Sports, Science and Technology study team on ethics and conflicts of interest in clinical research. In March 2008, the Ministry of Health, Labour and Welfare published the Guidelines on Conflict-of-Interest (COI) Management in Health and Labor Sciences Research (revised in February 2017), which clearly stated that conflict of interest management must be introduced for researchers who are planning studies in health and labor sciences. In January 2011, the Japan Pharmaceutical Manufacturers Association (JPMA) established the Transparency Guidelines for the Relation between Corporate Activities and Medical Institutions (revised in December 2013) and requested each company to disclose information on its website. In addition, there is an increasing awareness with regards to the public nature and transparency of the clinical trial results that are published in papers submitted to medical journals, and many medical journals adopt the common format for conflict of interest declarations that was established by the International Committee of Medical Journal Editors. In June 2010, JPMA adopted the "Joint Position on the Publication of Clinical Trial Results in the Scientific Literature" together with the International Federation of Pharmaceutical Manufacturers and Associations, the European Federation of Pharmaceutical Industries and Associations, and the Pharmaceutical Research and Manufacturers of America.

The Association, due to the nature of its activities, has many members who belong to a corporation and has a good basis for industry-academic collaboration. It is important to conduct research actively after having clearly indicated conflict of interest policy to members and ensured fairness in important industry-academic collaborative research and development projects. In 2009, JCA began to apply the "Policy on Conflicts of Interest in Cancer Clinical Research" jointly developed by general incorporated association Japan Society of Clinical Oncology and specified non-profit corporation Japanese Society of Medical Oncology, with necessary modifications and with the approval of those two organizations. In 2011, JCA developed its own Conflict of Interest Policy in Cancer Research, following the publication of the Guidelines for COI Management in Medical Research by the Japanese Association of Medical Sciences. In the following year, 2012, the Japanese Cancer Association (JCA) Detailed Regulations on the Handling of Conflict of Interest came into effect. Given the recent release of a major revision of the Japanese Association of Medical Sciences COI

Management Guidelines (March 2017), JCA integrated its existing policies and detailed regulations into the Policy.

Chapter 1. Purpose of the Policy

Article 1 (Purpose of Guideline Establishment)

In light of the fact that social responsibility and high ethical standards are paramount in its activities, JCA hereby establishes the JCA Conflict of Interest Policy in Cancer Research (hereinafter abbreviated as the "Policy"). The purpose of the Policy is for JCA to ensure that the presentation and dissemination of research findings, and activities to raise public awareness of research findings, are appropriately conducted in circumstances where neutrality and impartiality are maintained by appropriate management of conflicts of interest with respect to the covered individuals specified by JCA in Article 4, as well as to discharge social responsibility by contributing to the advancement of preventing, diagnosing, and treating cancer.

Article 2 (What does Conflict of Interest Management Cover?)

As has been mentioned in the Helsinki Declaration (World Medical Association, revised in 2013), medical research differs greatly from research in other academic fields in that, as the research subjects are human beings, special consideration is required to protect the rights and lives of subjects and conduct research safely. Also, the nature of research must not be distorted by researchers' conflicts of interest and the like. Nevertheless, there were media reports in 2012 on the alleged dishonest intervention by a certain enterprise in large-scale comparative clinical research in Japan. The enterprise was said to have failed to declare its conflicts of interest and have intentionally manipulated the data to its advantage, and several papers had to be retracted. Against this backdrop, the Ethical Guidelines for Medical and Health Research Involving Human Subjects, released by the Ministry of Education, Culture, Sports, Science and Technology and the Ministry of Health, Labour and Welfare in December 2014, required researchers and the like to manage their conflicts of interest and retain samples and information concerning their research. Furthermore, the Clinical Research Act took effect in April 2018. This Act provides for clinical research procedures, measures to ensure proper reviewing and consulting by an accredited institutional review board and the publication of information about the provision of clinical research funds and the like. It also requires responsible researchers to create standards and plans to manage conflicts of interest. Meanwhile, in line with the recent global trend of promoting translational research (the bridge between basic and clinical research) practices, the scope of conflict of interest management is expanding to include not only clinical research and studies, but also industry-academic collaborative research on basic life science. Therefore, JCA is now including basic research as well as clinical research and studies (including clinical trials and specified clinical research regulated under the Clinical Research Act) in the scope of conflict of interest management.

Article 3 (Compliance with the Policy)

The crux of the Policy is to highlight the basic concepts of conflict of interest to people participating in JCA's undertakings in order to advance the fair and smooth promotion of industry-academic collaboration. In addition, the Policy aims to prevent serious conflicts of interest, any improper acts associated with such conflicts of interest, and also the suspicion of society. JCA will require its members and the covered individuals specified below to observe the Policy.

Chapter 2. Covered Individuals and Activities

Article 4 (Covered Individuals)

The Policy applies to all of the following covered individuals for whom a conflict of interest may arise.

- (1) Members of JCA
- (2) Lead presenters and responsible researchers who give presentations at Annual Meetings, conferences, symposiums, open lectures for the general public, etc. who are sponsored or co-sponsored by JCA (hereinafter "Annual Meetings, etc.")
- (3) All authors who present their papers in JCA's journal "Cancer Science," etc.
- (4) Officers of JCA (directors, auditors, and committee chairpersons)
- (5) Members of the Ethics Committee and the Conflict of Interest Committee of JCA
- (6) Editors of JCA's journal "Cancer Science"
- (7) The president and administrative manager of JCA's Annual Meetings (hereinafter the "Meeting President, etc.")
- (8) Spouses and first-degree relatives of the individuals listed in (1) through (7), or other persons who share income or property with such individuals (hereinafter the "Relatives, etc.")

Article 5 (Covered Activities)

The Policy applies to activities in all undertakings concerned with JCA. Persons who give presentations at Annual Meetings, etc. and in *Cancer Science*, etc., among others, must

comply with the Policy in all their basic and clinical research on cancer. Lecturers who conduct educational lectures (including luncheon seminars) at academic gatherings etc. or who conduct open lectures for the general public in view of the powerful social influence of these undertakings must comply especially rigorously with the Policy.

Chapter 3. Matters Requiring Declaration and Disclosure

Article 6 (Common Matters Requiring Declaration and Disclosure; Their Standards)

If any of items (1) to (9) below exceeds criteria with respect to a covered individual who is an officer of JCA, member of the Ethics Committee or the Conflict of Interest Committee, editor of *Cancer Science*, Meeting President, etc., lead presenter or responsible researcher at Annual Meetings, etc., or author of a paper submitted to *Cancer Science*, etc. (hereinafter an "Individual Required to Make a Declaration"), such an individual shall have the obligation to accurately declare or disclose by self-declaration the circumstances of the conflict of interest in accordance with the prescribed form. In addition, if any of items (1) to (3) and (9) below exceeds criteria with respect to the Relatives, etc. of the Individual Required to Make a Declaration, the Individual Required to Make a Declaration shall have the obligation to declare the exact circumstances. Even if no item exceeds the criteria, such matter must be declared and disclosed. The declarer himself/herself shall bear responsibility for the self-declaration and the declared content.

- (1) Existence or otherwise of position as an officer of or an advisor (including consultant, etc.) to companies or for-profit organizations (hereinafter the "Companies, etc.") shall be declared if the annual value of remuneration from a single Company etc. is 1 million yen or more. If the declarer's Relatives, etc. is an employee of the Companies, etc., this shall also be declared.
- (2) Ownership of equities (such as shares and stock options) and profit obtained from those equities shall be declared if the annual value of profit on shares of a single Company, etc. (total sum of dividends and proceeds from the sale of shares) is 1 million yen or more, or the proportion of shares owned in the Company, etc. is 5% or more. Ownership of stock options shall be declared if latent profit from them is 1 million yen or more.
- (3) Patent royalties or transfer gains by the Companies, etc. shall be declared if the annual total value received from a single Company, etc. is 1 million yen or more.
- (4) Lecture fees, honoraria, or other fees paid by the Companies, etc. for the time or labor of a researcher engaged for conference attendance (as a lecturer,

- **chairperson, ad hoc advisor, etc.)** shall be declared if the annual total value received from a single Company, etc. is 500,000 yen or more.
- (5) Manuscript fees paid by the Companies etc. for **the writing of pamphlets, etc.** shall be declared if the annual total value received from a single Company, etc. is 500,000 yen or more.
- (6) Research funds (such as contract research funds, joint research funds, and clinical trial funds) provided under contract by the Companies, etc. or by non-profit organizations funded by the Companies, etc. shall be declared if annual total funds directly paid from a single Company, etc. or organization to the declarer is 1 million yen or more. If the declarer personally receives any consideration from the Companies, etc., it shall be declared separately.
- (7) Scholarship (incentive) endowments provided directly from the Companies, etc. or research grants provided directly from a private academic support organization to an individual declarer or the department (lecture/area of specialization etc.) or research facility an individual declarer belongs to, shall be declared if a total of 1 million yen or more per year is allocated from such funds from a single Company, etc. or organization to the individual declarer, with substantial control over its use given to that individual.
- (8) An endowed chair etc. funded by the Companies, etc. shall be declared if the declarer is affiliated with the chair. A researcher, etc. sent or provided by the Companies, etc. shall be declared if the declarer is the representative of the research facility with which the researcher, etc. is affiliated, regardless of whether or not employment costs for the researcher, etc. have been accepted.
- (9) Any other remuneration (travel expenses, gifts, etc., that are not directly related to research) shall be declared if the annual value of such remuneration received from a single Company, etc. is 50,000 yen or more.

Article 7 (Officers or Employees of the Companies, etc.; Persons Who Used to Belong to the Companies, etc.)

1) An officer or employee of the Companies, etc. (except for a person whose primary affiliation is with a university or research institute; hereinafter the same applies) shall not be obliged to make a self-declaration of conflict of interest under Article 6 of the Policy except for the matters set forth in the following paragraph; provided, however, that an officer or employee of the Companies, etc. who presents research findings at JCA Annual Meetings, etc. or submits a paper in *Cancer Science*, etc. shall give the name of the Companies, etc. in the presentation documents, papers, etc. even when he or she is

working as a researcher, research student, adult graduate student, postdoctoral fellow, part-time lecturer, or the like at a university or research institute other than the Companies, etc.

- 2) When an officer or employee of the Companies, etc. presents research findings at JCA Annual Meetings, etc. or submits a paper in *Cancer Science*, etc., he or she must declare any conflicts of interest, as defined in Article 6 of the Policy, that he or she has with the Companies, etc. other than his or her own Companies, etc. in connection with what is presented.
- 3) A person who left the Companies, etc. and found a post as a regular or part-time employee of a university or research institute (such as an adjunct professor) in the past 5 years and is still working on a research theme he or she worked on during employment with the Companies, etc. must disclose not only the name of the university or research institute, but also the name of the Companies, etc. when presenting the research findings at JCA Annual Meetings, etc. or submits a paper in *Cancer Science*, etc.

Chapter 4. Matters to Be Avoided

Article 8 (Matters to Be Avoided by All Covered Individuals)

The execution of research and publication of research findings should be based on purely scientific grounds and judgment or the public interest. All covered individuals to whom the Policy applies must not be influenced by the arbitrary judgment of a company or entity providing funding for research in decisions on whether to present research findings at conferences or in research papers or the publication content, namely the research findings or their interpretation, and, except as otherwise specified in the Policy, must not enter into any contracts under which such influence cannot be avoided.

Article 9 (Matters to Be Avoided by All Researchers Involved in Researcher-led Clinical Research)

- 1) If an industry-academic collaborative intervention study on humans is executed by researchers themselves, all the researchers should avoid the following.
 - (1) Obtaining non-contractual incentives for acting as intermediaries for or introducing prospective participants to the clinical research
 - (2) Obtaining non-contractual incentives for accumulating cases over a certain span of time
 - (3) Receiving travel and accommodation expenses from a fund provider or company for participation in academic conferences not related to the research

- (4) Obtaining non-contractual performance-based rewards for certain research findings
- 2) A responsible researcher or representative researcher (representative for multi-institutional joint research) who is authorized to make decisions concerning the planning and execution of researcher-led clinical research must ensure the proper disclosure of financial relationships with the fund provider involved in the research, and should use the utmost care to avoid the following matters.
 - (1) Receiving cash, gifts, etc. for the time and labor spent on the research, except for just compensation
 - (2) Behaving improperly, such as withholding the name of a company from execution plans or research findings from presentations when a researcher, part-time lecturer, adult graduate student, or other person affiliated with the company who has been dispatched to the research institute participates in the research
 - (3) Holding shares in an individual or corporate fund provider of the research or accepting a position as its officer etc. (except for a scientific consultant, advisor, etc. serving at no charge)
 - (4) Obtaining patents and patent royalties in connection with the research subject, such as drugs, treatment techniques, and test methods
 - (5) Becoming involved in situations that allow an individual or corporate fund provider to influence data aggregation, storage, statistical analysis, interpretation, and conclusion of the research
 - (6) Concluding agreements that allow the fund provider or an interested company to influence decisions concerning the presentation of the research findings at academic conferences or in the form of a paper
- 3) Researchers who fall under items (3) to (4) of the preceding paragraph are nonetheless permitted to serve as responsible or representative researchers for clinical research so long as they are essential to the planning and execution of the clinical research, which is considered extremely significant from a social perspective as well, and the impartiality, fairness and transparency of their judgments and actions are clearly secured. Also, if agreements that fall under (5) to (6) are accepted, detailed information about the role and involvement of the fund provider must be disclosed when the research findings must be published.

Chapter 5. Procedures for Declaration and Disclosure

Article 10 (Declaration and Disclosure of Conflicts of Interest by Association Officers, the editors of *Cancer Science*, Members of the Ethics Committee and the Conflict of Interest Committee)

- 1) Officers of JCA, the editors of Cancer Science, members of the Ethics Committee, and members of the Conflict of Interest Committee (hereinafter "Officers, etc.") must declare whether they had any conflicts of interest in the past 3 years in accordance with the standards set forth in Article 6 of the Policy. Similarly, a declaration must be made for any conflict of interest that fulfils the standards and involves the Relatives, etc. of the declarer. Conflicts of interest that need to be declared shall be limited to those pertaining to the Companies, etc. related to JCA's business.
- 2) Declarations shall be made by submitting the Self-Declaration of Conflict of Interest by Association Officers (Form 1) to JCA President before taking up the position and annually thereafter. Persons newly running for directorship must declare their conflicts of interest in Form 1 when they nominate themselves. In addition, if a new conflict of interest arises during the period of office, it must be declared in Form 1 within 8 weeks.

Article 11 (Declaration and Disclosure of Conflicts of Interest by the Meeting President, etc.)

- 1) The JCA Meeting President, etc. must declare whether they had conflicts of interest in the past 3 years in accordance with the standards set forth in Article 6 of the Policy. Similarly, a declaration must be made for any conflict of interest that fulfils the standards and involves the Relatives, etc. of the declarer. Conflicts of interest that need to be declared shall be limited to those pertaining to the Companies, etc. related to JCA's business.
- 2) The Meeting President, etc. must declare the matters set forth in Form 1 to JCA President in writing before appointment. If they have already declared information as JCA Officers, etc., it shall suffice if they declare only those matters that do not duplicate the already declared information. If any changes occur in the conflicts of interest of the Meeting President, etc. during their periods of office, the details of the said changes must be promptly declared to JCA President. In addition, if a new conflict of interest arises during the period of office, it must be declared in Form 1 within 8 weeks.

Article 12 (Declaration and Disclosure of Conflicts of Interest by Lead Presenters and Responsible Researchers Making Presentations at Annual Meetings, etc.)

- 1) Lead presenters and responsible researchers who make presentations or give lectures at Annual Meetings, etc. sponsored or co-sponsored by JCA must declare whether they had any conflicts of interest with the Companies, etc. related to the presentation subjects in the past 3 years from the time of subject registration, and give detailed information about the conflicts, in accordance with the standards set forth in Article 6 of the Policy, regardless of whether or not they are JCA members. Similarly, a declaration must be made for any conflict of interest that fulfils the standards and involves the Relatives, etc. of the declarer.
- 2) Declarations shall be made in advance using Form 2 and shall be disclosed at the time of the presentation.

Article 13 (Declaration and Disclosure of Conflicts of Interest in Cancer Science, etc.)

The authors of a paper appearing in *Cancer Science* must declare whether any of the authors had conflicts of interest with the Companies, etc. related to the paper in the past 3 years from the time of posting, and give detailed information about the conflicts, in accordance with the standards set forth in Article 6 of the Policy and pursuant to the *Cancer Science* Conflict of Interest Policy, regardless of whether or not they are JCA members. Similarly, a declaration must be made for any conflict of interest that fulfils the standards and involves the Relatives, etc. of the declarer. The details stated in the Disclosure Form shall be published with the paper. If there is no state of conflict of interest that fulfils the standards, the wording "The authors have no conflict of interest" shall be published in the same place. The same shall apply to presentations in JCA publications other than *Cancer Science*.

Chapter 6. Jurisdiction over Conflict of Interest Management

Article 14 (Conflict of Interest Committee)

The Conflict of Interest Committee shall be composed of a small number of Directors nominated by the Board of Directors, a small number of Councilors, and at least 1 external member. JCA President shall nominate the committee chairperson. In accordance with the Policy, the Conflict of Interest Committee shall be in charge of judgment, management, advice and guidance for preventing members' conflicts of interest from becoming serious, and deal with Policy violations in cooperation with the Board of Directors, the Editorial Committee of JCA's Official Journal, and the Ethics Committee in order to promote proper cancer research through industry-academic collaboration. The committee shall also respond to questions and requests about conflicts of interest, raise conflict-of-interest awareness among the members, gather information for use in Policy review, and draft Policy revisions.

Article 15 (Roles of Officers, etc. and Meeting President, etc.)

- 1) If there arises a serious conflict of interest during the course of the execution of JCA business by any of the Officers, etc. or Meeting President, etc., or if there arises any doubt about a self-declaration of conflict of interest made by any Individual Required to Make a Declaration, the Board of Directors may refer the matter to the Conflict of Interest Committee and, if necessary, the Ethics Committee (hereinafter the "Committee with Jurisdiction"; the Committee with Jurisdiction shall always include the Conflict of Interest Committee) and prescribe remedial measures based on their advice.
- 2) If research findings are presented at JCA Annual Meetings, etc., the Meeting President, the editorial manager, and the Conflict of Interest Committee shall make sure that conflicts of interest related to the research, if any, have been declared and disclosed properly. They may stop any subject inconsistent with the Policy from being presented. In such cases, they promptly notify the individuals planning the presentation to that effect and provide reasons.
- 3) If research findings are published in *Cancer Science*, editor and associate editor of *Cancer Science* shall make sure that conflicts of interest related to the research, if any, have been declared and disclosed properly. They may stop any article inconsistent with the Policy from being published. In such cases, they promptly notify the individuals planning the presentations to that effect and provide reasons. If any violation of the Policy is discovered after the publication, it may be announced in the publication media etc. in the name of the Editor-in-Chief. These measures are discussed by the Committee with Jurisdiction and implemented following approval of the Board of Directors on the basis of the findings.
- 4) Other committee chairpersons and members shall promptly consider remedial measures for Policy violations as they occur in connection with JCA undertakings in which they are involved. These measures are discussed by the Committee with Jurisdiction and implemented following approval of the Board of Directors on the basis of the findings.

Article 16 (Confidential Obligations of the Parties Concerned)

Members of the Committee with Jurisdiction and other parties concerned who access the declared information on conflicts of interest (such as JCA's clerical staff in charge, editors, associate editors and editorial office members of *Cancer Science*, companies providing management services for Annual Meetings, etc.) shall have confidentiality obligations for such information permanently, except as otherwise specified in Articles 18 and 19 and except as otherwise justified by laws and regulations.

Chapter 7. Handling of Conflicts of Interest

Article 17 (Storage, Management, Deletion, and Disposal of Conflict of Interest Information)

Conflict of interest information submitted to JCA shall be stored and managed strictly as personal information at JCA Secretariat with JCA President as the officer responsible for its management. Conflict of interest information concerning people who have completed a term of office as the Officers, etc. and people whose withdrawal from membership of a committee has been confirmed shall be deleted/disposed of under the supervision of the officer responsible for its management when 2 years have passed since the final date of completion of the said term of office. However, if the Board of Directors has deemed that deletion or disposal is inappropriate, JCA may suspend the deletion or disposal of the conflict of interest information of the declarer concerned. Conflict of interest information concerning the Meeting President, etc. shall be handled in the same way as that of the Officers, etc.

Article 18 (Use of Conflict of Interest Information)

Conflict of interest information may be used as needed by JCA Officers, etc. in accordance with the Policy in order to determine the existence and extent of any conflict of interest between the individual concerned and JCA's activities and to process such matters in accordance with JCA's judgment. On occasions of such use, use must not exceed the limits required by the purpose of use, and the conflict of interest information must not be disclosed to parties other than those to whom disclosure is required in light of the above-mentioned purpose of use.

Article 19 (Disclosure and Publication of Conflict of Interest Information)

Conflict of interest information shall not, as a matter of principle, be made public. Conflict of interest information may be disclosed or published within and outside JCA to the extent necessary after deliberation by the Board of Directors if such disclosure or publication is needed for JCA to fulfill its social or moral accountability for any of its activities, including, but not limited to, the activities of itself, its committees, and its ad hoc committees. However, this shall not prevent JCA President delegating the said issue to a specific director for its handling and allowing the said director to make a decision under the advice of the Conflict of Interest Committee and the Ethics Committee. In such cases, the parties concerned with the conflict of interest information to be disclosed or made public may raise their opinions with the Board of Directors or the Directors to whom the decision has been delegated. However, this shall not apply when there is no time to ask for opinions because of urgency in regard to disclosure or public announcement.

Chapter 8. Measures Against Guideline Violators and Accountability

Article 20 (Measures against Guideline Violators)

The JCA Board of Directors has the authority to deliberate on Policy violations and, if it concludes upon deliberation that the act under review constitutes serious noncompliance with the Policy, the Board may take one or more of the following measures for a fixed period of time in accordance with the seriousness of the noncompliance.

- (1) Prohibition from making presentations at Annual Meetings, etc. held by JCA
- (2) Prohibition from publication of papers and articles in JCA's publications and website, etc.
- (3) Prohibition from serving as the JCA Meeting President
- (4) Prohibition from participation in JCA's boards of directors, committees, or working groups
- (5) Expulsion from JCA's Council or prohibition from becoming a councilor
- (6) Expulsion from JCA or prohibition from becoming a member

Article 21 (Issuance of Disciplinary Orders)

- If a person required to make a declaration under the Policy fails to do so in the designated written form or submits a false declaration, that person may be punished in accordance with the provisions of the Policy.
- 2) If any doubt or social/moral issue occurs with regard to the details of self-declarations of conflict of interest submitted by authors presenting papers in Cancer Science, etc. or parties scheduled to give presentations at JCA Annual Meetings, etc., the Conflict of Interest Committee shall conduct an investigation and review the facts related to the issue and deliver a verdict based on the advice of the Board of Directors in order to fulfill JCA's social accountability. The Board of Directors shall respond to the Ethics Committee based on the verdict received from the Conflict of Interest Committee and provide advice on the details of action to be taken. If there is a serious conflict of interest situation and the responsibility to explain is not fulfilled, JCA may take action such as suspending a conference presentation by the relevant party scheduled to make a presentation or the publication of a paper, etc. If any doubt or other issue arises after a paper is presented, JCA shall investigate the related facts and, if any Policy violation is found, shall consider disciplinary action such as retracting the published article. In addition, if public trust in JCA is seriously undermined, JCA may take appropriate disciplinary action in accordance with its bylaws and disciplinary regulations, such as expulsion from JCA, suspension from JCA activities, and strong warnings.

3) If the Conflict of Interest Committee points out any problem with regard to the conflict of interest matters declared by the JCA Officers, etc. or the Meeting President, etc., or its candidates prior to or after installation, then the Chairperson of the Conflict of Interest Committee shall report it to JCA President in writing and JCA President may, upon receiving the report, take appropriate action in cooperation with the Ethics Committee, including the withdrawal of delegated responsibility to the officers or committee members, or the disqualification of candidate officers or committee members.

Article 22 (Filing of Objections Against Actions)

A person who has an objection to an action taken under Article 20 or 21 of the Policy may request a review by submitting a written request to JCA President through JCA Secretariat within 7 days of receiving notice of the action. Parties raising objections shall state concisely their specific counter arguments or dissenting opinions to the reasons for the retraction of responsibility, etc., that JCA President has indicated in writing. In such cases, in addition to the information disclosed to JCA President, parties raising objections may also present related information in document form that supports the reason for their objections.

Article 23 (Handling of an Objection)

- 1) If a request for review is made, JCA President must promptly establish a Conflict of Interest Issue Appeal Committee (hereinafter referred to as the "Review Committee"). The Review Committee shall be composed of a small number of Directors, a small number of Councilors and at least 1 external member nominated by JCA President, and the committee chairperson shall be nominated by JCA President. Members of the Conflict of Interest Committee or the Ethics Committee may not serve concurrently as members of the Review Committee. The Review Committee shall meet and review the request within 30 days of receiving the review request.
- 2) The Review Committee shall directly hear the opinions of the chairperson and the requester with regard to the review request. However, this shall not apply if the said parties do not appear on the date determined for the hearing of opinions.
- 3) Unless there are special circumstances, the Review Committee shall summarize and submit the review results to JCA President within 30 days of the first committee meeting on the case. JCA President shall take the Review Committee's decisions as final.

Article 24 (Accountability to Society)

When JCA has judged there has been a serious violation of compliance with the Policy in research findings presented at a venue in which JCA is involved, JCA will discharge its

accountability to society following discussion by the Committee with Jurisdiction and Board of Directors.

Chapter 9. Policy Revision

Article 25 (Policy Revision)

It may be necessary to revise part of the Policy considering individual cases in order to accommodate social factors, or keep abreast with the amendments and establishment of laws concerning industry-academic collaborations, and changes surrounding cancer research. Therefore, the Conflict of Interest Committee may conduct deliberations on possible Policy revisions and revise the Policy with the resolutions of the Board of Directors and the Board of Councilors every few years, in principle.

Supplementary Regulations

Article 1 (Date of effect)

The Policy comes into effect on September 28, 2014.

The Policy comes into effect on October 9, 2016.

The Policy comes into effect on September 30, 2018.