

Policy Description and Purpose

Title: Financial conflict of interest (FCOI) policy in federally sponsored research

Date: May 1, 2021

Purpose: To promote objectivity in research by establishing standards that preserve the integrity of research, and prevent bias in the design, conduct and reporting of research funded under PHS grants, contracts or cooperative agreements that may result from any financial conflict of interest by investigators or key personnel

Training Policy

- The Training Policy establishes a process to inform each investigator/key personnel of the:
 - Institution’s policy
 - Disclosure responsibilities
 - Federal regulation
- The Training Policy requires each PHS-supported investigator to complete financial conflict of interest (FCOI) training:
 - Prior to engaging in research related to any PHS-funded grant
 - At least every 4 years
 - Immediately, if:
 - Institution revises its FCOI policy that affects requirements of investigators
 - An investigator is new to an Institution
 - An investigator is not in compliance with the policy or management plan

[42 CFR 50.604\(b\)](#)

[42 CFR 50.604\(b\)](#)

Training Policy

Prior to receiving a Notice of Award for an NIH-funded research grant or contract, the Principal Investigator will provide the Scientific Operations Manager the names of the investigators/key personnel* involved in the research grant/contract. The Scientific Operations Manager will determine whether each investigator has a certificate for completion of FCOI training on file and, if so, the date of the training certification. Investigators who have no certificate on file with the Company (Symberix, Inc.) or who have a certificate that is more than four years old will be required to complete FCOI training using an on-line

tutorial designed by NIH. FCOI training is also mandatory for those key personnel who are not in compliance with the FCOI policy or management plan.

The URL for the tutorial is: https://grants.nih.gov/grants/policy/coi/tutorial2018/story_html5.html.

The Principal Investigator is responsible for identifying all investigators who have a significant financial interest (SFI) requiring disclosure under the FCOI policy and to provide key personnel a copy of the Company's FCOI policy, disclosure responsibility, and regulatory requirements relating to FCOI.

*Investigator and key personnel are used interchangeably in this Policy

Disclosure, Review and Monitoring Policy

The Disclosure, Review and Monitoring Policy requires each investigator (as well as investigator's spouse and dependent children) to disclose SFI's related to the investigator's institutional responsibilities:

- No later than at the time of application for PHS-funded research
- At least annually during the period of the award
- Within 30 days of discovering or acquiring a new SFI

[42 CFR 50.603](#)

[42 CFR](#)

[50.604\(e\)\(1\)-\(3\)](#)

Disclosure, Review and Monitoring Policy (Part 1)

It is the responsibility of the Principal investigator of a Research project to identify all key personnel who have a significant financial interest (SFI) requiring disclosure under this policy and to ensure that a SFI disclosure form is prepared and submitted. In addition, the Principal Investigator shall be responsible for ensuring that annual updates and disclosures of new or increased financial interests are disclosed. To assist Principal Investigators with this responsibility, the Scientific Operations Manager will send out reporting reminders, SFI disclosure forms, and receive completed SFI disclosure forms and provide to the Scientific Operations Manager for annual review. Principal Investigators are responsible for reporting SFIs that occur between these reporting timelines.

All investigators shall provide SFI disclosure forms annually or more frequently if required by the management plan. Any investigator who acquires a new or increased SFI shall promptly submit a new SFI disclosure form within 30 days of discovering or acquiring the new SFI. It is the Principal investigator's

responsibility to ensure that any newly acquired investigator on a research project submits the required SFI disclosure form to the Scientific Operations Manager. The Scientific Operations Manager must report to NIH any FCOIs within 10 days of notification of new SFIs identified by the Principal Investigator on either notification report, or annual report, and immediately upon review and determination of any bias found with the design, conduct, or reporting of NIH-funded research and to include the requirement to submit a Mitigation Report in accordance with the regulation.

The following items will be included in the FCOI reporting to NIH:

- The name of the investigator with the FCOI
- The name of the entity with which the investigator has an FCOI
- The nature of the SFI
- The value of the financial interest
- Description of how the financial interest relates to the NIH-funded research and why the institution determined that the financial interest conflicts with such research
- Description of the key elements of the Company's management plan, including other required information

<input type="checkbox"/> The Scientific Operations Manager: <ul style="list-style-type: none"> <input type="checkbox"/> Solicits and reviews disclosures of SFIs of the investigator (and those of the investigator's spouse and dependent children) related to an investigator's institutional responsibilities. <input type="checkbox"/> This Policy describes the process of determining whether an investigator's SFI is related to PHS-funded research and, if so, whether the SFI is an FCOI. <input type="checkbox"/> This Policy establish a process for the Scientific Operations Manager and Principal Investigator to: <ul style="list-style-type: none"> <input type="checkbox"/> Review all investigator SFI disclosures <input type="checkbox"/> Determine if any SFIs relate to PHS-funded research <input type="checkbox"/> Determine if an FCOI exists (SFI that could directly and significantly affect the design, conduct, or reporting of the NIH-funded research) <input type="checkbox"/> Develop and implement management plans, as needed to manage FCOIs <input type="checkbox"/> This policy describes the process for determining whether a SFI qualifies as a FCO and implement a management plan when required for an investigator who is new to participating in the research project or for an existing investigator who discloses a new SFI.	42 CFR 50.604(d) 42 CFR 50.604(f) 42 CFR 50.605(a)(1) 42 CFR 50.605(a)(3) and (i) - (iii)
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<input type="checkbox"/> This policy establishes a process to review disclosures of SFIs, make determination of FCOIs, and implement a management plan within sixty days whenever an Institution identifies an SFI that was not disclosed timely by an investigator or not previously reviewed by the Institution.	42 CFR 50.605(a)(2)
<input type="checkbox"/> This policy establishes a process to take such actions as necessary to manage FCOIs, including any financial conflicts of a subrecipient investigator, if applicable, and monitor investigator compliance with management plans until completion of the project.	42 CFR 50.604 (g) 42 CFR 50.605(a)(4)
<p><i>Disclosure, Review and Monitoring Policy (Part 2)</i></p> <p>Every individual having a SFI requiring disclosure under this policy shall prepare a fully completed SFI disclosure form that shall be submitted to the Scientific Operations Manager. An initial review of the SFI Disclosure Form will be conducted by the Scientific Operations Manager to determine whether a potential for conflict of interest exists. The Scientific Operations Manager will coordinate with the Principal Investigator (in consultation with the CEO) to determine if potential financial conflict of interest exists by comparing the focus, contractual involvements, and research goals of the research project against the SFI disclosure form provided by the researcher. If it is determined that there is a potential conflict of interest, then steps will be taken to determine what measures are needed to address the SFI identified in the SFI disclosure form. A management plan may be required to outline the terms, conditions, and restrictions, if any, to ensure compliance with this policy. The management plan may require one or more of the following actions (but not limited to these actions) to be taken in order to manage, reduce or eliminate any actual or potential conflict of interest:</p> <ul style="list-style-type: none"> • Public disclosure of SFIs. • Review of research protocols by independent reviewers. • Monitoring of research by independent reviewers. • Modification of research plan. • Disqualification from participation in all or a portion of the research funded. • Divesture of SFIs. • Severance of relationships that create actual or potential conflicts. <p>All management plans are required to be signed by the investigator and the Scientific Operations Manager (in consultation with the CEO). Compliance of the management plan shall be monitored by the Scientific Operations Manager and implemented within 60 days of identified FCO</p>	

NIH Reporting Policy

<p><input type="checkbox"/> This policy establishes a process to send initial, annual (i.e., ongoing) and revised FCOI reports, including all reporting elements required by the regulation, to the NIH for the Institution and its subrecipients, if applicable, as required by the regulation:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Prior to the expenditure of funds <input type="checkbox"/> Within 60 days of identification for an investigator who is newly participating in the project <input type="checkbox"/> Within 60 days for new, or newly identified, FCOIs for existing investigators <input type="checkbox"/> At least annually (at the same time as when the Institution is required to submit the annual progress report, multi-year progress report, if applicable, or at time of extension) to provide the status of the FCOI and any changes to the management plan, if applicable, until the completion of the project. <input type="checkbox"/> Following a retrospective review to update a previously submitted report, if appropriate. 	<p>42 CFR 50.604(h) 42 CFR 50.605(b)</p>
<p><input type="checkbox"/> This policy establishes the procedures to notify NIH promptly if bias is found with the design, conduct or reporting of NIH-funded research and to include the requirement to submit a Mitigation Report in accordance with the regulation.</p> <ul style="list-style-type: none"> <input type="checkbox"/> The policy and/or procedures includes all reporting elements as required by the regulation. 	<p>42 CFR 50.605(a)(3)(iii)</p>
<p><input type="checkbox"/> This policy establishes the procedures to notify NIH promptly if an investigator fails to comply with the Institution’s FCOI policy or a FCOI management plan appears to have biased the design, conduct, or reporting of the NIH-funded research.</p> <ul style="list-style-type: none"> <input type="checkbox"/> The policy addresses the Institution’s requirement to notify NIH promptly and take corrective action for noncompliance with the Institution’s policy or the management plan. 	<p>42 CFR 50.606(a)</p>

NIH Reporting Policy

All investigators/key personnel shall provide annual SFI Disclosure Forms or more frequently if required by the management plan or acquired interests. Any investigator who acquires a new or increased SFI shall promptly submit a new SFI disclosure form within 30 days of discovering or acquiring the new SFI. It is the Principal Investigator's responsibility to ensure that any newly acquired investigator on a research project submits the required SFI Disclosure Form to the Scientific Operations Manager.

The Scientific Operations Manager must report to NIH any FCOIs within 10 days of notification of new SFIs identified by the Principal Investigator on either notification report, or annual report, and immediately upon review and determination of any bias found with the design, conduct, or reporting of NIH-funded research and to include the requirement to submit a Mitigation Report in accordance with the regulation, and including the following NIH FCOI reporting items:

- The name of the investigator with the FCOI
- The name of the entity with which the investigator has an FCOI
- The nature of the SFI (SFI)
- The value of the financial interest
- Description of how the financial interest relates to the NIH-funded research and why the institution determined that the financial interest conflicts with such research
- Description of the key elements of the Company's management plan, including other required information

Table 1. When to disclose and report

INVESTIGATOR DISCLOSES KNOWN SFI(S) TO SYMBERIX	SYMBERIX REPORTS IDENTIFIED FCOI(S) TO NIH
At time of application	Prior to the expenditure of funds
Within 30 days of acquiring or discovering SFI	Within 60 days of identification
Annually at the time period prescribed by the Institution during the award period	Annually: (<u>for any Financial Conflict of Interest previously reported</u>) At the same time as when the grantee submits the annual progress report or the extension of project.

Table 2. Required reports to be provided to NIH through eRA Commons FCOI Module

REPORT	CONTENT	TIME-FRAME
Initial FCOI Report	Grant Number, Principal Investigator, Name of Entity with FCOI, Value of financial interest (in increments), Description of how FI relates to research, Key Elements of Management Plan.	1) Prior to expenditure of funds 2) Within 60 days of any subsequently identified FCOI
Annual FCOI Report	Status of FCOI and changes to Management Plan.	For any Financial Conflict of Interest previously reported - Due at same time as when submitting annual progress report or at time of extension.
Revised FCOI Report	If applicable, update a previously submitted FCOI report to describe actions that will be taken to manage FCOI going forward.	After completion of retrospective review, if needed.
Mitigation Report	Project Number, Project Title, Contract Principal Investigator/PD, Name of investigator with FCOI, Name of Entity with FCOI, Reason for review, Detail Methodology, Findings and Conclusion.	When bias is found as a result of a retrospective review.

Record Maintenance Policy

- This policy establishes the procedure to maintain all FCOI-related records that meets or exceeds the regulatory requirements:
 - For at least 3 years from the date the final expenditures report is submitted to the PHS (NIH).
 - From other dates specified in 45 CFR 75.361, where applicable.

[42 CFR 50.604\(i\)](#)

Record Maintenance Policy

Records of investigator SFI Disclosure Forms, and of actions taken to manage actual or potential conflicts of interest, shall be retained by the Scientific Operations Manager for three (3) years from the date the

final expenditure report is submitted to the NIH, or as required by 45 CFR 74.53(b) and 92.42(b) for different situations.

Policy for FCOI Enforcement and Remedying Non-Compliance

<input type="checkbox"/> This policy provides adequate enforcement mechanisms and provide for employee sanctions or other administrative actions to ensure investigator compliance.	42 CFR 50.604(j)
<input type="checkbox"/> This policy establishes the requirement to complete and document retrospective reviews within 120 days of the Institution’s determination of noncompliance for SFIs not disclosed timely or previously reviewed or whenever an FCOI is not identified or managed in a timely manner and to document the reviews consistent with the regulation.	42 CFR 50.605(a)(3)
<input type="checkbox"/> The policy establishes the procedures to ensure that in any case in which the Department of Health and Human Services determines that a PHS-funded research project of clinical research whose purpose is to evaluate the safety or effectiveness of a drug, medical device, or treatment has been designed, conducted, or reported by an investigator with an FCOI that was not managed or reported by the Institution as required by the regulation, the Institution shall require the investigator involved to: <ul style="list-style-type: none"> <input type="checkbox"/> Disclose the FCOI in each public presentation of the results of the research, and <input type="checkbox"/> To request an addendum to previously published presentations. 	42 CFR 50.606(c)

Policy for FCOI Enforcement and Remedying Non-Compliance

Investigators are expected to comply fully and promptly with this policy. Whenever a person has violated this policy, including failure to make a required disclosure of financial interests or failure to comply with a requirement of the management plan, the Scientific Operations Manager and Principal investigator shall make recommendations to the CEO regarding the impositions of sanctions or disciplinary proceedings against the violating individual. The Scientific Operations Manager, Principal Investigator and CEO will review together the specific behaviors and consequences that are determined relevant based upon review, and any other administrative actions to assure investigator compliance, including but not limited to supervised research activities. The Company will conduct retrospective reviews within 120 days following determination of noncompliance for SFIs not disclosed in a timely manner or previously reviewed or whenever an FCOI is not identified or managed in a timely manner and to document the reviews consistent with the regulation.

In addition, the Company shall follow Federal regulations regarding the notification of the sponsoring agency in the event an investigator has failed to comply with this policy. The federal agency may take its own action as it deems appropriate, including the suspension of the funding for the investigator until the matter is resolved. In any case in which the Department of Health and Human Services determines that a PHS-funded research project of clinical research whose purpose is to evaluate the safety or effectiveness of a drug, medical device, or treatment has been designed, conducted or reported by an investigator with an FCOI that was not compliantly managed or reported, the investigator involved will be required to: (i) disclose the FCOI in each public presentation of the results of the research, and (ii) request an addendum to previously published presentations of the same. investigator will provide evidence of these disclosures to the Company.

Subrecipient FCOI Policy

<ul style="list-style-type: none"> <input type="checkbox"/> Establish a policy and procedure to address subrecipient requirements. <input type="checkbox"/> Where applicable, establish, via a written agreement, whether the subrecipient will follow the FCOI policy of the awardee Institution or the FCOI policy of the subrecipient. <ul style="list-style-type: none"> <input type="checkbox"/> If applicable, obtain a certification from the subrecipient that its FCOI policy complies with the regulation. <input type="checkbox"/> If applicable, include in the written subrecipient agreement a requirement for the subrecipient to report identified FCOIs for its Investigators in a time frame that allows the awardee Institution to report identified FCOIs to the NIH as required by the regulation. <input type="checkbox"/> Alternatively, if applicable, include in the written agreement a requirement to solicit and review subrecipient Investigator disclosures that enable the awardee Institution to identify, manage and report identified FCOIs to the NIH. 	<p>42 CFR 50.604(c)</p> <p>42 CFR 50.604(c)</p> <p>(1)(i)-(iii)</p>
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Subrecipient Policy

Sub-award recipients must comply with this policy or provide certification that their organization complies with the Federal policy, 2011 Revised Financial Conflict of Interest Regulation, Promoting Objectivity in Research (42 CFR part 50 subpart F) and that their portion of the research project, as detailed in their sub-award agreement, is compliant with their institutional policies. Prior to Notification of Award, Company and sub-award recipient will establish in written agreement which FCOI policy will be followed by which

investigator, and if applicable, certification that the sub-award policy complies with the regulations, requirement to report identified FCOIs in a timeframe that permits Company to report identified FCOIs to NIH as required by regulation, or that Company will solicit and review subrecipient investigator disclosures to enable identification, management and reporting of FCOIs as required by NIH. If an SFI is identified by the sub-award recipient, they are required to notify the Scientific Operations Manager of the existence of the conflicting interest within 30 days of the identification of the interest. In addition, the sub-award recipient must certify and assure that any reported conflicting interest has been managed, reduced, or eliminated in accordance with federal regulations.

Public Accessibility Requirements

- This FCOI policy is publicly accessible on the Company’s Web site
- This policy assures that available information concerning identified FCOIs held by senior/key personnel (as defined by the regulation) will be publicly accessible prior to the expenditure of funds. The information will:
 - Include the minimum elements as provided in the regulation
 - Be posted on the Company’s website or made available within 5 days of a written request
 - Be updated, at least annually (Web site only but any response to a written request should include the updated information)
 - Be updated, within 60 days of a newly identified FCOI (Web site only but any response to a written request should include the updated information)
 - Remain available for three years from the date the information was most recently updated.

[42 CFR 50.604\(a\)](#)

[42 CFR 50.605\(a\)](#)
[\(5\)\(i\)-\(iv\)](#)

Public Accessibility Policy

The Company will provide public access to this policy on publicly accessible page of www.syberix.com. The Scientific Operations Manager will ensure that any updated versions of this policy are provided for updated posting immediately upon implementation. In addition, an FCOI determined to exist for any key personnel will be posted to this same webpage in compliance with regulation, including the date of posting and (i) the minimum elements as provided in the regulation; (ii) posting within 5 days of a written request; (iii) annual updates, unless written requests are made which should continue to be available; (iv) any updates within 60 days of newly identified FCOI; and (v) remain available for three years from the date the information was most recently updated.



APPENDIX A: GLOSSARY

Disclosure of significant financial interests (SFI): An investigator's disclosure of SFIs to the Public Health Division.

Financial conflict of interest (FCOI): A SFI that could directly and significantly affect the design, conduct, or reporting of PHS-funded research.

FCOI report: An institution's report of a financial conflict of interest to an organization unit of the PHS that funds the research.

Financial interest: Anything of monetary value, whether or not the value is readily ascertainable.

Health and Human Services (HHS): The United States Department of Health and Human Services, and any components of the Department to which the authority involved may be delegated.

Institution: Any domestic or foreign, public or private, entity or organization (excluding a Federal agency) applying for or receiving NIH research funding.

Institutional responsibilities: investigator's professional responsibilities on behalf of the Institution which may include for example: activities such as research, research consultation, teaching, professional practice, institutional committee memberships, or service on panels such as Institutional Review Boards or Data and Safety Monitoring Boards.

Investigator: The project director or Principal Investigator and any other person, regardless of title or position who is responsible for the design, conduct or reporting of research funded by the PHS, or proposed for funding. The investigator may include collaborators or consultants. The term investigator includes the investigator's spouse and dependent children.

Key personnel: The investigator and any other person identified as senior or key personnel by the Institution in the grant application, progress report, or any other report submitted to the PHS by the Institution.

Manage: Taking action to address a FCOI, which can include reducing or eliminating the financial conflict of interest, to ensure, to the extent possible, that the design, conduct, and reporting of research will be free from bias.

Principal investigator: Principal investigator of a PHS-funded research project; the Principal Investigator is included in the definitions of senior/key personnel and investigator under this subpart.

PHS Act: Public Health Service act is a statute codified at 42 U.S.C. 201 et seq.



Public Health Service (PHS): The Public Health Service of the U.S. Department of Health and Human Services, and any components of the PHS to which the authority involved may be delegated, including the National Institutes of Health (NIH).

Research: A systematic investigation, study or experiment designed to develop or contribute to generalizable knowledge relating broadly to public health, including behavioral and social-sciences research. The term encompasses basic and applied research (e.g., a published article, book or book chapter) and product development (e.g., a diagnostic test or drug). As used in this subpart, the term includes any such activity for which research funding is available from a PHS Awarding Component through a grant or cooperative agreement, whether authorized under the PHS Act or other statutory authority, such as a research grant, career development award, center grant, individual fellowship award, infrastructure award, institutional training grant, program project, or research resources award.

Senior/key personnel: The principal investigator and any other person identified as senior/key personnel by the Institution in the grant application, progress report, or any other report submitted to the PHS by the Institution under this subpart.

Significant financial interest (SFI): Includes any one or more of the following from any single entity outside the company or institution for activity that is related to the investigator's professional qualifications:

- (1) A financial interest consisting of one or more of the following interests of the investigator (and those of the investigator's spouse and dependent children) that reasonably appears to be related to the investigator's institutional responsibilities:
 - (i) With regard to any publicly traded entity, a SFI exists if the value of any remuneration received from the entity in the twelve months preceding the disclosure and the value of any equity interest in the entity as of the date of disclosure, when aggregated, exceeds \$5,000;
 - (ii) With regard to any non-publicly traded entity, a SFI exists if the value of any remuneration received from the entity in the twelve months preceding the disclosure, when aggregated, exceeds \$5,000, or when the investigator (or the investigator's spouse or dependent children) holds any equity interest (e.g. stock, stock option, or other ownership interest); or
 - (iii) Upon receipt of income related to intellectual property rights and interests (e.g., patents, copyrights).
- (2) Investigators also must disclose the occurrence of any reimbursed or sponsored travel (i.e., that which is paid on behalf of the investigator and not reimbursed to the investigator so that the exact monetary value may not be readily available), related to their institutional responsibilities, provided, however, that this disclosure requirement does not apply to travel that is reimbursed or sponsored by excluded sources provided in regulation. For example, if the Principal Investigator travels to a scientific seminar but does not pay or receive reimbursement by the Company directly (i.e., the travel was paid for by a third



party/sponsor), the Principal Investigator is required to disclose basic information to the Company relating to the trip, such as purpose of the trip, identify of the payer/sponsor, destination, and duration. The Company is required to determine if additional information is required (e.g., monetary value) and whether the travel constitutes a FCI with NIH-funded research.

(3) The term SFI does not include the following types of financial interests:

- (i) salary, royalties, or other remuneration paid by the Institution to the investigator if the investigator is currently employed or otherwise appointed by the Institution.
- (ii) intellectual property rights assigned to the Institution and agreements to share in royalties related to such rights.
- (iii) any ownership interest in the Institution held by the investigator, if the Institution is a commercial or for-profit organization.
- (iv) income from investment vehicles, such as mutual funds and retirement accounts, as long as the investigator does not directly control the investment decisions made in these vehicles.
- (v) income from seminars, lectures, or teaching engagements sponsored by a federal, state or local government agency, an Institution of higher education as defined at 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education.
- (vi) income from service on advisory committees or review panels for a federal, state or local government agency, Institution of higher education as defined at 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education.



APPENDIX B: SIGNIFICANT FINANCIAL INTEREST DISCLOSURE FORM

This form must be completed by all investigators, including all who defined by the regulation, are responsible for the design, conduct or reporting of NIH-funded Phase II SBIR/STTR research. This form needs to be completed and submitted to the Scientific Operations Manager or Principal investigator at the time an application is submitted for external research support, annually and within 30 days of discovering or acquiring (e.g., through purchase, marriage or inheritance) a new SFI.

Grant Number: **To be filled out by Company**

Grant Title: **To be filled out by Company**

Start/End Dates: **To be filled out by Company**

Principal investigator: **To be filled out by Company**

Scientific Operations Manager: **To be filled out by Company**

FCOI Training Certificate on File: **To be filled out by Company**

Date of FCOI Training Certificate: **To be filled out by Company**

Name of investigator: **To be filled out by investigator**

Title/Position: : **To be filled out by investigator**

Role and principal duties: **To be filled out by investigator**

Date of FCOI Training: **To be filled out by investigator**

1. Financial Interest in Publicly Traded Companies

Yes/No

Over the past 12 months, have you received income or obtained other financial interest in excess of \$5,000 from a publicly traded company that is in any way related the **To be filled out by Company** titled **To be filled out by Company** or that might be affected by your proposed research activities? Examples of income include salary and any payment for services not otherwise identified as salary (e.g., consulting fees, honoraria, paid authorship); equity interest includes any stock, stock option, or other ownership interest, as determined through reference to public prices or other reasonable measure of fair market value).



2. Financial Income from Non-publicly Traded Companies

Yes/No

Over the past 12 months, have you received income in excess of \$5,000 from a non-publicly traded company that is in any way related to **To be filled out by Company** or that might be affected by your proposed research activities? Examples of income include salary, honoraria, paid authorship.

3. Equity Income from Non-publicly Traded Companies

Yes/No

Over the past 12 months, have you held any equity interest in a non-publicly traded company that is in any way related to **To be filled out by Company** or that may be affected by your proposed research activities?

4. Intellectual Property

Yes/No

Have you received any income from intellectual property rights and interests (e.g. from patents, copyrights, or royalty agreements) from any companies in any way related to **To be filled out by Company** or that might be affected by your proposed research?

5. SBIR/STTR Phase

Yes/No

Have you held any equity interest in a SBIR/STTR phase II funded company that is in any way related to **To be filled out by Company** or that might be affected by your proposed research activities?

If you have answered "yes" to any of the above questions, please work the Scientific Operations Manager to develop a management plan to eliminate, reduce or manage your FCOI. Please note: you may be asked for more specific information.

6. Paid Travel for Companies

Yes/No

Have you received any travel that has been paid for or reimbursed by any entity other than a Federal, state or local government, an institution of higher education, an academic teaching hospital, a medical center or a research institute associated with an institution of higher education?

If you answered "yes" to Question #6, please provide the following information before forwarding to the Scientific Operations Manager. Please note that you may be asked for more specific information.



Purpose of the trip: To be filled out by investigator

Destination: To be filled out by investigator

Duration: To be filled out by investigator

Who sponsored this travel?: To be filled out by investigator

Investigator Statement:

I have read and understood Syمبرix’s Financial Conflict of Interest Policy and have made all required financial interest disclosures; I will submit a proposal for a Conflict of Interest Management Plan if necessary; and I will comply with any conditions or restrictions imposed by Syمبرix, Inc. to eliminate, reduce, or manage conflicts of interest regarding my research.

Signature: To be filled out by investigator

Printed Name: To be filled out by investigator

Date: To be filled out by investigator