

Financial Conflicts of Interest Policy

SBS 2B Tech LLC

Purpose

The purpose of this policy is to promote objectivity in research by establishing standards that provide a reasonable expectation that the design, conduct, or reporting of funded research, grants, or cooperative agreements will be free from bias resulting from an Investigator's financial conflicts of interest (and/or those of the Investigator's spouse and/or dependent children).

This policy complies with Title 42 Code of Federal Regulations (CFR), Part 50, Subpart F.

Scope

This policy applies to Investigators participating in, or planning to participate in, the design, conduct, reporting, or proposing of research funded by the Public Health Service (PHS) or National Institutes of Health (NIH).

Definitions

Financial Interest: Anything of monetary value held by the Investigator, spouse, and/or dependent children.

Financial Conflict of Interest (FCOI): A Significant Financial Interest (SFI) related to research that could directly and significantly affect the design, conduct, or reporting of research.

Significant Financial Interest (SFI):

- Publicly traded entities: Aggregated remuneration and equity exceeding \$5,000 in the preceding 12 months.
- Non-publicly traded entities: Remuneration exceeding \$5,000 or any equity interest.
- Intellectual property income.
- Reimbursed or sponsored travel (for NIH-funded investigators).

Exclusions include salary paid by 2B Tech and certain government/academic activities.

Policy

Investigators must disclose all relevant SFIs annually and within 30 days of discovering a new SFI. Disclosure is required at proposal submission to NIH even if no financial interests exist.

Review Process

The FCOI Administrator conducts initial review. The Management Advisory Committee (MAC) evaluates potential conflicts and determines appropriate

action.

Management of FCOIs

Possible management actions include:

- Public disclosure
- Disclosure to research subjects
- Independent monitoring
- Research plan modification
- Personnel changes
- Divestiture of financial interests
- Severance of conflicting relationships

Monitoring

MAC monitors compliance with management plans.

Research Involving Humans

Investigators with FCOIs shall not ordinarily participate in human subjects research unless compelling circumstances justify participation and safeguards are implemented.

Appeals

Investigators may appeal MAC decisions within 15 days. Appeals will be reviewed and decided within 60 days.

Confidentiality

Disclosures remain confidential except where federal regulation requires public accessibility.

Enforcement

Non-compliance may result in disciplinary action including reprimand, termination, suspension of research, or sponsor-mandated sanctions.

Additional PHS/NIH Requirements

2B Tech will submit required FCOI reports to PHS/NIH prior to expenditure of funds and annually thereafter. Subrecipient agreements will establish applicable FCOI policies.

Public Accessibility

This policy is posted at 2btech.io.

Information regarding identified FCOIs held by senior/key personnel may be requested by emailing hayden@2btech.io.

Information remains publicly accessible for three years.

Training Requirements

PHS-funded investigators must complete FCOI training prior to engaging in funded research and every four years thereafter, or sooner if required.



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Records

2B Tech will maintain records related to this policy for at least three years after award termination or final resolution.