

FINANCIAL CONFLICTS OF INTEREST POLICY FOR RESEARCH SUPPORTED BY THE NATIONAL INSTITUTES OF HEALTH

Policy Name: Financial Conflicts of Interest Policy
Policy Number: COI-2
Version Number: 1.0
Policy Applies to: Employees
Date of Adoption: December 15, 2025
Date of Last Amendment: N/A
Approved by: President
Visible to: Public

Purpose:

This Financial Conflicts of Interest Policy (this “Policy”) is made in compliance with [42 CFR part 50 subpart F](#): Promoting Objectivity in Research (2011 Revised Financial Conflict of Interest Regulation) to document the requirements and responsibilities of Velakor Biotherapeutics, Inc. (the “Company”) and its employees to identify and address Financial Conflicts of Interest (FCOIs) relating to Funded Research to ensure that the Company’s research is free from bias and the appearance of bias.

As an applicant for, and recipient of, federal U.S. Public Health Service (“PHS”) research funds, the Company is required to establish standards that provide a reasonable expectation ensuring that the design, conduct, and reporting of federally sponsored research is free from bias that could arise due to FCOIs. This requirement includes, without limitation, informing Covered Persons of this Policy, his/her disclosure responsibilities under this Policy, and the federal regulations underpinning this Policy. See the full text of the regulations and the final rule implementing the regulations as published in the Federal Register for more information.

The requirements of this Policy should be read in conjunction with the Company’s Conflict of Interest Policy, which provides general instruction on preventing, recognizing, and mitigating conflicts of interest.

This Policy will address (i) Key Definitions applicable to this Policy; (ii) SFI Disclosure Requirements; (iii) Guidelines for Determining ‘Relatedness’ of SFI to PHS/NIH-Funded Research and a Financial Conflict of Interest; (iv) Management of Significant Financial Interests that Pose Financial Conflict of Interest; (v) Monitoring Investigator Compliance; (vi) Reporting of Identified Financial Conflicts of Interest; (vii) Training Requirements; (viii) Failure to Comply with Company’s Financial Conflict of Interest Policy Applicable to Public Health Service Funded Award; (ix) Clinical Research Requirements; (x) Subrecipient Requirements;

(xi) Maintenance of Records; (xii) Public Accessibility Requirements; (xiii) Violation of this Policy; (xiv) Administration of this Policy; and (xv) Additional FCOI & NIH Resources.

1. Key Definitions Applicable to this Policy:

- **Financial Conflict of Interest (FCOI):** A significant financial interest that could directly and significantly affect the design, conduct, or reporting of PHS-funded research.
- **FCOI Designated Official:** The individual designated by Company to oversee the financial conflicts of interest process, including solicitation and review of disclosures of significant financial interests, identification of FCOIs per the regulatory criteria provided in 42 CFR 50.604(f), and monitoring staff FCOI training requirements. James Peyer, President (james@cambrianbio.com) is the Company's FCOI Designated Official.
- **Financial Interest:** Anything of monetary value, whether or not the value is readily ascertainable.
- **Institution** means any domestic or foreign, public or private, entity or organization (excluding a Federal agency) that is applying for, or that receives, Public Health Service (e.g., NIH) funding.
- **Institutional Responsibilities:** Professional activities an Investigator performs on behalf of Company.
 - Investigator's Institutional Responsibilities shall include, but are not necessarily limited to, planning and conducting Company's research, research publication, product development, consulting (including research consultation), public relations, fundraising, business development, and communications to Company's Board of Directors.
- **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 an award or proposed for funding, which may include collaborators or consultants. Company will consider the individual's role, rather than the title, and the degree of independence with which the individual works when determining who is responsible for the design, conduct, or reporting of the PHS-funded research.
- **Research:** Research means 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 the regulation, the term includes any such activity for which research funding is available from a PHS Awarding Component through a grant, 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.

- **PHS-Funded Research:** Any activity for which research funding is available from a PHS Awarding Component through a grant, cooperative agreement, or contract, whether authorized under the PHS Act or other statutory authority.
- **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).
- **Senior/Key Personnel:** The PD/PI and any other person identified as senior/key personnel by Company in the grant application, progress report, or any other report submitted to the PHS/NIH by Company.
- **Significant Financial Interest (SFI):**
 - 1) A **domestic or foreign** 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 appear to be related to the *Investigator's Institutional Responsibilities* performed on behalf of Company:
 - i. **Publicly Traded Entity:** A significant financial interest 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. Remuneration includes 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 measures of fair market value.
 - ii. **Non-Publicly Traded Entity:** A significant financial interest 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).
 - iii. **Intellectual Property Rights and Interests:** A significant financial interest exists upon receipt of income greater than \$5,000 received over the preceding months that is related to such rights and interests (e.g., patents, copyrights).

Investigators must disclose the occurrence of any **reimbursed or sponsored travel** that exceeds \$5,000 (i.e., 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 the Investigator's Institutional Responsibilities. The initial disclosure of reimbursed or sponsored travel should include income received over the previous twelve months. The details of this disclosure will include, at a minimum, the purpose of the trip, the identity of the sponsor/organizer, the destination, and the duration.

The disclosure requirement does not apply to travel reimbursed or sponsored by the following:

- A federal, state, or local government agency located in the United States;
- A United States Institution of higher education;
- An academic teaching hospital;
- A medical center; or
- A research institute affiliated with a United States Institution of Higher Education.

A Significant Financial Interest does not include (and therefore Investigators are not required to disclose) the following types of financial interests:

- Salary, royalties, or other remuneration paid by Company to the Investigator if the Investigator is currently employed or otherwise appointed by Company, including intellectual property rights assigned to Company and agreements to share in royalties related to such rights.
- Any ownership interest in Company held by the Investigator, as Company is a commercial or for-profit organization and such interest is excluded from the SFI definition per regulation.
- 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.
- Income from seminars, lectures, or teaching engagements sponsored by a federal, state, or local government agency located in the United States, a U.S. Institution of higher education, an academic teaching hospital, a medical center, or a research institute affiliated with a U.S. Institution of higher education.
- Income from service on advisory committees or review panels for a federal, state, or local government agency located in the United States, a U.S. Institution of higher education, an academic teaching hospital, a medical center, or a research institute affiliated with a U.S. Institution of higher education.

Foreign Financial Interests: Investigators must also disclose all foreign financial interests (including income from seminars, lectures, or teaching engagements, income from service on advisory committees or review panels, and reimbursed or sponsored travel) received from any foreign entity, including foreign Institutions of higher education or a foreign government (which includes local, provincial, or equivalent governments of another country) when such income meets the threshold for disclosure (e.g., income in excess of \$5,000).

2. Significant Financial Interest Disclosure Requirements

Investigators and Senior/Key Personnel will disclose their SFIs that are related to their Institutional Responsibilities.

The disclosure will not be limited to an Investigator's research responsibilities or their funded research as this is too narrow in scope and not consistent with the 2011 regulation.

The SFI Disclosures will be retained by the Institution as part of the record maintenance requirements.

Investigators will disclose their SFIs at the following times:

- **At the time of application:** The Principal Investigator and all other individuals who meet the definition of 'Investigator' must disclose their SFIs to Company's FCOI Designated Official. Any new Investigator who, after applying for NIH funding or during the course of the research project, plans to participate in the project must similarly disclose their SFI(s) to the FCOI Designated Official promptly and prior to participation in the project.
- **Annually:** Each Investigator participating in research under an NIH award must submit an updated disclosure of SFI at least annually, during the period of the award. The annual disclosure must include any information not disclosed initially to Company pursuant to this Policy or in a subsequent disclosure of SFI (e.g., any financial conflict of interest identified on an NIH-funded project directly as an NIH Grantee and/or indirectly through a sub-award) that was transferred from another Institution, and must include updated information regarding any previously disclosed SFI (e.g., the updated value of a previously disclosed equity interest).
- **Ad Hoc Basis:** New SFIs During the Award: Each Investigator participating in PHS/NIH-funded research must submit an updated disclosure of SFI within thirty (30) days of discovering or acquiring a new SFI (e.g., through purchase, marriage, or inheritance). Investigators must also submit an updated disclosure of reimbursed or sponsored travel within 30 days of each occurrence.

Review of SFI Disclosures by Company's FCOI Designated Official

The FCOI Designated Official will conduct reviews of SFI disclosures. The FCOI Designated Official will review any SFI identified in a disclosure and compare these interests to each PHS/NIH research application and/or award on which the Investigator is identified as responsible for the design, conduct, or reporting of the research to determine if the SFI is related to the PHS/NIH-funded research and, if so, whether the SFI creates a Financial Conflict of Interest (FCOI) related to that research award as

explained in Section 6.

The SFI disclosures will be reviewed as described below:

- **Prior to Expenditure of Awarded Funds:** The FCOI Designated Official will review the Investigator's SFI(s) prior to the NIH issuing a new award. If an FCOI is identified, Company will submit an FCOI report to the NIH via the eRA Commons FCOI Module prior to the expenditure of funds under the new award.
- **Annual Disclosure:** The annual disclosure will require the Investigator to disclose updated values of any previously disclosed SFIs (e.g., the updated value of a previously disclosed equity interest). The FCOI Designated Official will review the Investigator's annual disclosure and use the updated information to determine if any changes are needed to an existing management plan. Any changes to an existing management plan will be reported to the NIH when the next Annual FCOI report is due, if applicable.
- **Ad Hoc Basis – New SFIs During Award Period:** Whenever, in the course of an ongoing NIH-funded research project, an Investigator who is new to participating in the research project discloses a SFI or an existing Investigator discloses a new SFI, the FCOI Designated Official will, within sixty (60) days: review the disclosure of SFI, determine whether the SFI is related to the NIH-funded research, determine whether an FCOI exists, and, if so, implement, on at least an interim basis, a management plan that shall specify the actions that have been, and will be, taken to manage the FCOI. Company will submit the FCOI report to the NIH within sixty (60) days of identifying the FCOI.

3. Guidelines for Determining 'Relatedness' of SFI to PHS/NIH-Funded Research and a Financial Conflict of Interest

The FCOI Designated Official will determine whether an Investigator's SFI is related to the research under an NIH award and, if so, whether the SFI is a financial conflict of interest.

Relatedness Test: An Investigator's SFI is related to the research when the FCOI Designated Official reasonably determines the SFI:

- a. Could be affected by the PHS/NIH-funded research; or
- b. Is in an entity whose financial interest could be affected by the PHS/NIH- funded research.

Investigator Involvement: The FCOI Designated Official may involve the Investigator in determining whether an SFI is related to the NIH-funded research.

FCOI Determination: A financial conflict of interest exists when the FCOI Designated Official reasonably determines that the SFI could directly and significantly affect the design, conduct, or

reporting of the PHS/NIH-funded research. ‘Significantly’ means that the financial interest would have a material effect on the research.

4. Management of Significant Financial Interests that Pose Financial Conflict of Interest

If a financial conflict of interest exists, the FCOI Designated Official will determine what management conditions and/or strategies will be put in place to manage the FCOI. Examples of conditions that might be imposed to manage a financial conflict of interest include, but are not limited to:

- Public disclosure of financial conflicts of interest (e.g., when presenting or publishing the research, to research personnel working on the study, to the Institution’s Institutional Review Board, Institutional Animal Care and Use Committee, Data Safety and Monitoring Board, etc.);
- For research projects involving human subjects research, disclosure of financial conflicts of interest directly to human participants in the informed consent document;
- Appointment of an independent monitor capable of taking measures to protect the design, conduct, and reporting of the research against bias resulting from the financial conflict of interest;
- Modification of the research plan;
- Change of personnel or personnel responsibilities, or disqualification of personnel from participation in all or a portion of the research;
- Reduction or elimination of the financial interest (e.g., sale of an equity interest);
- Severance of relationships that create financial conflicts.

If the FCOI Designated Official determines that a conflict exists, it will communicate its determination and the means developed for managing the FCOI in writing to the individual.

No expenditures on an NIH award will be permitted until the Investigator has complied with the Disclosure requirements of this Policy and has agreed, in writing, to comply with any plans determined by the FCOI Designated Official necessary to manage the Financial Conflict of Interest. The FCOI Designated Official of Company will submit the FCOI report to NIH via the eRA Commons FCOI Module.

5. Monitoring Investigator Compliance

Company will monitor Investigator compliance with the management plan for the duration of the NIH award or until the FCOI no longer exists. Monitoring of public disclosure requirements will include reviewing publications and presentations to confirm that the Investigator disclosed the FCOI in such communications. To facilitate additional monitoring, Investigators will be required to disclose the FCOI in writing to research personnel in the study and send a copy of the

communication to the FCOI Designated Official which will serve as documentation for compliance with the management plan.

Identified FCOIs held by Senior/Key Personnel: Prior to the expenditure of any funds under an NIH award, Company will ensure public accessibility by providing a written response to any requestor within five business days of a request for information concerning any SFI disclosed that meets the following three criteria:

1. The SFI was disclosed and is still held by the senior/key personnel (PD/PI and any other person identified as senior/key personnel by Company in the award application, progress report, or any other report submitted to the NIH);
2. Company has determined that the SFI is related to the research funded through an award; and
3. Company has determined that the SFI is a financial conflict of interest.

The information made available via the public website or in a written response will include, at a minimum:

1. The Investigator's name;
2. The Investigator's title and role with respect to the research project;
3. The name of the entity in which the Significant Financial Interest is held;
4. The nature of the Significant Financial Interest; and
5. The approximate dollar value of the Significant Financial Interest in the following ranges: \$0-\$4,999; \$5,000-\$9,999; \$10,000-\$19,999; amounts between \$20,000-\$100,000 by increments of \$20,000; amounts above \$100,000 by increments of \$50,000, or a statement that the interest is one whose value cannot be readily determined through reference to public prices or other reasonable measures of fair market value.

The written response will note that the information provided is current as of the date of the correspondence and is subject to updates on at least an annual basis and within sixty (60) days of the Institution's identification of a new FCOI which should be requested subsequently by the requestor.

If the Company uses a publicly accessible website to meet this requirement, the information posted will be updated at least annually and within sixty (60) days of:

- Receiving or identifying an additional SFI of Senior/Key personnel related to the NIH-funded research that was not previously disclosed, or
- A new SFI being disclosed by Senior/Key personnel joining the project and determined by the FCOI Designated Official to be related to the research and an FCOI.

Information on SFIs subject to the public accessibility requirement will remain available for at least three (3) years from the most recent update.

6. Reporting of Identified Financial Conflicts of Interest

Company will assign an institutional official to serve as the FCOI Signing Official (SO) within the eRA Commons FCOI Module. The FCOI Designated Official has the authority to submit FCOI reports to the NIH. FCOI reports are submitted to the NIH only when a grant or cooperative agreement is active and an FCOI is identified (i.e., no award – no FCOI and no FCOI – no FCOI report). The FCOI Module User Guide is available at https://www.era.nih.gov/files/fcoi_user_guide.pdf to assist in submitting reports to the NIH.

INITIAL OR ORIGINAL (Original) FCOI REPORTS:

- **Prior to the Expenditure of Funds:** When an FCOI is identified upon the issuance of a new NIH award, the FCOI Designated Official will submit a NIH “2011 FCOI” Original report prior to the expenditure of any funds under an NIH award. The Original FCOI report will include the information required in the regulation at 42 CFR Part 50.605(b)(3) or as outlined in NIH's FAQ H.5. at <https://grants.nih.gov/faqs#/financial-conflict-of-interest.htm?anchorff52888>.
- **Within sixty (60) days of Identifying a new FCOI During Award Period:** When an FCOI is identified during the period of an NIH-funded award (e.g., a new SFI is identified for an Investigator, or upon the participation of a new Investigator), Company will provide to NIH within sixty (60) days of identifying the FCOI, an Original FCOI report regarding the financial conflict of interest.

ANNUAL FCOI REPORTS: While the award is ongoing (including any extensions with or without funds), Company will provide NIH with an annual FCOI report that addresses the status of the previously reported FCOI (i.e., whether the FCOI is still being managed or if it no longer exists) and any changes in the management plan, if applicable.

The Annual FCOI report will be submitted at the same time as when the Research Performance Progress Report or multi-year progress report is due and at the time of grant extension, if applicable, per the NIH guidance (see NIH's FAQ H.2. at <https://grants.nih.gov/faqs#/financial-conflict-of-interest.htm?anchorff52860>). The NIH will send an annual report email notification to the Institution when an annual report is due.

Annual FCOI reports are not submitted as part of grant closeout.

REVISION (or Mitigation) FCOI REPORTS: Following the completion of a retrospective review, the Institution will provide NIH with a Revision if new information is discovered or a Mitigation Report if bias is found.

The types of FCOI reports and their requirements are summarized below:

REQUIRED FCOI REPORTS TO BE PROVIDED TO NIH THROUGH eRA COMMONS FCOI MODULE		
REPORT	CONTENT	REQUIRED WHEN?
New FCOI Report (Initial submission)	Grant Number, PI, Name of Entity with FCOI, Nature of 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 sixty (60) days of any subsequently identified FCOI
Annual FCOI Report	Status of FCOI (i.e., whether FCOI is still being managed or no longer exists) and Changes to Management Plan, if applicable.	Annual report due at the same time as when the Institution is required to submit annual progress report, multi-year 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 or make changes to originally submitted FCOI report.	Following the completion of a retrospective review when there is noncompliance with the regulation, if needed.
Mitigation Report	Project Number, Project Title, Contact PI/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.

7. Training Requirements:

Each Investigator and Senior/Key Personnel will be informed about this Policy and trained on the Investigator's responsibility to disclose foreign and domestic SFIs per this policy and the FCOI regulation at 42 CFR Part 50 Subpart F. FCOI training will occur prior to an Investigator engaging in PHS/NIH-funded research, at least every four years, and immediately (as defined below) when any of the following circumstances apply:

- Company revises this Policy, or procedures related to this Policy, in any manner that affects the requirements of Investigators and/or Senior/Key Personnel;
- An Investigator and/or Senior/Key Personnel is new to Company's research under an NIH award (training is to be completed prior to his/her participation in the research); or
- Company finds that an Investigator and/or Senior/Key Personnel are not in compliance with this Policy or a Management Plan issued under this Policy (training is to be completed within thirty (30) days in the manner specified by the FCOI Designated Official).

To fulfill the FCOI training requirement, Company requires its Investigators to complete the National Institutes of Health's Financial Conflict of Interest tutorial located at https://grants.nih.gov/grants/policy/coi/tutorial2018/story_html5.html in accordance with the requirements and expectations of this Policy. All Investigators and Senior/Key Personnel must email a certification of completion at the end of training and the FCOI Designated Official will retain it for audit purposes. Additionally, Company requires its Investigators and Senior/Key Personnel to review the NIH Virtual Seminar presentation on developing or refining institutional FCOI policies at <https://www.youtube.com/watch?vffD292Y26BX24>.

8. Failure to Comply with Company's Financial Conflict of Interest Policy Applicable to Public Health Service Funded Award

Whenever the Institution identifies an SFI that was not disclosed, identified, reviewed or managed in a timely manner, the FCOI Designated Official will within sixty (60) days: review the SFI, determine whether the SFI is related to research; determine whether an FCOI exists, and, if so, implement, on at least an interim basis, a management plan that shall specify the actions that have been, and will be, taken to manage such FCOI going forward. The Institution will also submit an FCOI report to the PHS/NIH via the eRA Commons FCOI Module.

In addition, whenever an FCOI is not identified or managed in a timely manner, including:

- Failure by the Investigator to disclose a significant financial interest that is determined by Company to constitute a FCOI;
- Failure by Company to review or manage such an FCOI; or
- Failure by the Investigator to comply with a management plan.

Company will, within one hundred twenty (120) days of determining non-compliance:

- Complete a retrospective review of the Investigator's activities and the PHS/NIH- funded research project to determine whether any NIH-funded research, or portion thereof, conducted during the period of the noncompliance was biased in the design, conduct, or reporting of research;
- Document the retrospective review consistent with the regulation at 42 CFR 50.605(a)(3)(ii)(B) or as described in NIH's FAQ I.2. at <https://grants.nih.gov/faqs#/financial-conflict-of-interest.htm?anchorff52895>.

If bias is found, Company shall notify NIH promptly and submit a mitigation report per the regulation at 42 CFR 50.605(a)(3)(iii) or as described in NIH's FAQ I.3. at <https://grants.nih.gov/faqs#/financial-conflict-of-interest.htm?anchorff52896> to NIH via the eRA Commons FCOI Module that shall address:

- Impact of the bias on the research project, and
- Company's plan of action or actions taken to eliminate or mitigate the effect of the bias.

Thereafter, Company will submit FCOI reports annually to NIH in accordance with the NIH guidance as provided in the summary chart above. Depending on the nature of the FCOI, Company may determine that additional interim measures are necessary with regard to the Investigator's participation in the research project between the date that the Financial Conflict of Interest is identified and the completion of Company's independent retrospective review.

If bias is not found, no further action will be taken unless new information is discovered that needs to be reported to the NIH. If applicable, update existing FCOI report to specify the actions that have been, and will be, taken to manage the FCOI going forward or update previously submitted report information (e.g., increase in value of the SFI or add any newly identified SFIs) following the completion of the retrospective review.

9. Clinical Research Requirements

If the Department of Health and Human Services determines that one of its funded clinical research projects, 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 a Financial Conflict of Interest that was not managed or reported by Company, Company shall require the Investigator involved to disclose the Financial Conflict of Interest in each public presentation of the results of the research and to request an addendum to previously published presentations.

10. Subrecipient Requirements:

If and as applicable, Company shall address FCOI subrecipient requirements (See FAQ K.1) including compliance with NIH subaward/consortium written agreement requirements provided in the NIH Grants Policy Statement Section 15.2.1.

Company shall also establish, via a written agreement:

- Whether the subrecipient will follow the FCOI policy of the awardee Company or the FCOI policy of the subrecipient.
- Obtain a certification from the subrecipient that its FCOI policy complies with the regulation.
- 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 Company to report identified FCOIs to the NIH as required by the regulation.

- Alternatively, include in the written agreement a requirement to solicit and review subrecipient Investigator disclosures that enable the awardee Company to identify, manage and report identified FCOIs to the NIH.

11. Maintenance of Records

Company shall keep all records of all Investigator disclosures of financial interests and Company's review of, or response to, such disclosures (whether or not a disclosure resulted in the determination of a Financial Conflict of Interest), and all actions under this policy or retrospective review, if applicable. Records of financial disclosures and any resulting action will be maintained for at least three years from the date of submission of the final expenditures report or, where applicable, from other dates specified in 45 C.F.R. 75.361 for different situations. Company will retain records for each competitive segment as provided in the regulation.

Management plans will be retained as part of the Company's records.

In addition, the Institution will make information available, promptly upon request, to the HHS relating to any Investigator disclosure of financial interests and the Institution's review of, and response to such disclosure whether or not the disclosure resulted in the Institution's determination of an FCOI per the regulation 42 CFR 50.606(b).

12. Public Accessibility Requirements:

As required by the applicable regulation, this Policy will be made publicly accessible on the Company's public website (<https://cbtemplate-final-43d0ef3e-e2fbc55be1f96.webflow.io/privacy#Financial-Conflict>)

Additionally, A copy of this Policy will be posted on the NIH's public website per the NIH requirements in the NIH Grants Policy Statement Section [4.1.10 Financial Conflict of Interest](https://grants.nih.gov/grants/policy/nihgps/HTML5/section_4/4.1.10_financial_conflict_of_interest.htm) at https://grants.nih.gov/grants/policy/nihgps/HTML5/section_4/4.1.10_financial_conflict_of_interest.htm.

13. Violation of this Policy:

Failure to fully comply with this policy (including non-disclosure, whether intentional or not; willfully providing materially incomplete or inaccurate disclosures, and failure to adhere to conflict management plans), and/or failure to provide disclosure in a timely manner can result in disciplinary action up to, and including, immediate termination.

14. Administration of this Policy:

The Company expressly reserves the right to change, modify, or delete the provisions of this Policy without notice, but at a minimum in accordance with NIH guidance and standards.

The President is responsible for the administration of this Policy. All employees are responsible for consulting and complying with the most current version of this Policy. If you have any questions regarding this Policy that are not addressed herein, please contact the FCOI Designated Official, (james@CambrianBio.com).

15. Additional FCOI & NIH Resources

- NIH's email address to send FCOI-related inquiries: FCOICompliance@mail.nih.gov
- FCOI Regulation 42 CFR Part 50 Subpart F: <https://www.ecfr.gov/current/title-42/chapter-I/subchapter-D/part-50/subpart-F>
- Financial Conflict of Interest: <https://grants.nih.gov/policy-and-compliance/policy-topics/fcoi>
- FCOI Training: <https://grants.nih.gov/policy-and-compliance/policy-topics/fcoi/fcoi-training>
- FCOI Frequently Asked Questions (FAQs): <https://grants.nih.gov/faqs#/financial-conflict-of-interest.htm?anchorff3875>
- Information for Foreign Grants: <https://grants.nih.gov/new-to-nih/information-for/foreign-grants>
- NIH's Welcome Wagon Letter: <https://grants.nih.gov/policy-and-compliance/welcome-wagon>
- NIH Grants Policy Statement: <https://grants.nih.gov/policy/nihgps/index.htm>
- NIH Guide for Grants and Contracts: <https://grants.nih.gov/funding/guide.htm>
- NIH Extramural Nexus:
<https://public.govdelivery.com/accounts/USNIHOER/subscriber/new?qsppffCODERED>

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