



Financial and Grant SOP	Version: 1.0
Conflict of Interest Policy	

PURPOSE:

GNP Research is committed to ensuring that all research conducted under sponsored funding, including NIH-funded subawards, is objective, transparent, and free from bias resulting from financial conflicts of interest.

This policy establishes procedures to identify and disclose significant financial interests, evaluate potential conflicts, manage or eliminate financial conflicts of interest (FCOIs), and comply with NIH and federal regulations. This policy applies to all Investigators involved in federally funded research.

REGULATORY BASIS

This policy complies with 42 CFR Part 50 Subpart F (PHS FCOI Regulations), 45 CFR Part 94, the NIH Grants Policy Statement, and 2 CFR Part 200 (Uniform Guidance). If required by a prime awardee under a subaward agreement, GNP Research will comply with additional FCOI terms specified in that agreement.

COVERED INDIVIDUALS

This policy applies to any individual responsible for the design, conduct, or reporting of NIH-funded research, including Principal Investigators, Co-Investigators, senior/key personnel, and consultants who make research decisions. These individuals are referred to as Investigators.

SIGNIFICANT FINANCIAL INTEREST (SFI)

Significant Financial Interest includes:

- Payments exceeding \$5,000 from a publicly traded entity in the past 12 months.
- Equity interests exceeding \$5,000 in a publicly traded entity.
- Any equity interest in a privately held company.
- Intellectual property income (patents, royalties).
- Sponsored or reimbursed travel related to institutional responsibilities.

Exclusions include salary paid by GNP Research, diversified investment funds (e.g., mutual funds), and payments from government agencies or accredited academic institutions.

DISCLOSURE REQUIREMENTS

Investigators must disclose SFIs at proposal submission, prior to expenditure of NIH funds, annually during the award period, and within 30 days of acquiring a new SFI.

REVIEW PROCESS

GNP Research will designate a Conflict-of-Interest Officer to review disclosures, determine whether an SFI constitutes an FCOI, document findings, and develop management plans if necessary. An FCOI exists if the SFI could directly and significantly affect the design, conduct, or reporting of NIH-funded research.



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MANAGEMENT OF CONFLICTS

If an FCOI is identified, GNP Research will implement a written management plan. Management strategies may include public disclosure, disclosure in publications, disclosure to human subjects (if applicable), independent data review, modification of research responsibilities, or divestiture of financial interests.

NIH SUBAWARD COMPLIANCE

As a subrecipient under NIH funding, GNP Research will provide required FCOI disclosures to the prime awardee institution in a timely manner to allow reporting to NIH prior to expenditure of funds. If a conflict was not disclosed or managed timely, GNP will conduct a retrospective review and implement corrective actions if needed.

HUMAN SUBJECTS RESEARCH

If research involves human participants, conflicts must be disclosed to the IRB and may require disclosure in consent documents. Additional safeguards may be implemented as necessary to protect participant's safety and research integrity.

TRAINING

Investigators participating in NIH-funded research must complete FCOI training before engaging in funded research, at least every four years, and immediately if noncompliance occurs or the policy is updated.

RECORD RETENTION

GNP Research will retain disclosure forms, review determinations, management plans, and retrospective review documentation for at least three years from the date of final expenditure reporting.

NONCOMPLIANCE

Failure to disclose financial interests or comply with management plans may result in removal from the project, internal disciplinary action, notification to the prime awardee, and required mitigation reporting to NIH if applicable.

CERTIFICATION

All Investigators must certify that they have read this policy, understand their obligations, and agree to comply with disclosure and management requirements.



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