	Financial Conflict of Interest Policy	
Document No.	Version No.	Effective Date
POL-CGR-0007	01	Upon final approval

1. Purpose

HDT Bio Corp. (“HDT Bio”) receives federal grants, contracts and/or cooperative agreements for research. This policy is aimed at ensuring that the design, conduct, or reporting of research funded under grants and cooperative agreements will not be biased by any conflicting financial interest of the investigators responsible for the research.

HDT Bio, which is covered under the regulation, promotes objectivity in research by establishing this Financial Conflict of Interest (FCOI) Policy to ensure there is no reasonable expectation that the design, conduct, or reporting of federally funded research will be biased by any conflicting financial interest of an Investigator.

2. Scope

This policy applies to all HDT personnel listed as principal investigator or key personnel on a grant.

3. Related Documents

- HDT Procurement Policy
- FCOI Disclosure Form

4. Roles and Responsibilities

Principal Investigator/Key Personnel

- When required by policy, submit a timely and accurate FCOI disclosure.
- Adhere to any Significant Financial Interest (SFI) mitigation plans, per the Risk Management Committee.

Risk Management Committee


- Review submitted FCOI reports and enact any needed SFI mitigation plans when SFI is determined to exist.
- Communicate any deviations from the SFI mitigation plans to Grants Management Team.

Human Resources

Solicits FCOI disclosures from new hires, and at a cadence of at least annually for key personnel on grants.

Grants Management Team

- Ensure this policy is posted publicly.
- Provide a list of key personnel on grants to HR for annual FCOI reporting needs.
- Provide initial and ongoing FCOI reports to the PHS as required pursuant to CFR § 50.605(b).
- Ensure subrecipients have FCOI policies that meet the requirements of 42 CFR Part 50, Subpart F. If such policies do not exist, the subrecipient must comply with HDT’s policy.

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5. Definitions and Acronyms

Federal Funding/Federal Funds: funding received for research grants, contracts, or cooperative agreements from the federal government.

Covered Individual: Person required to submit a financial conflict of interest disclosure, due to their role as it pertains to a grant.

Financial Conflict of Interest (FCOI): a significant financial interest that could directly and significantly influence the design, conduct and reporting of research.

Key Personnel: any other person who is responsible for the design, conduct or reporting of research from Federal Funding.


Principal Investigator (PI): the lead researcher responsible for the design, conduct, and administration of a research project, ensuring compliance with ethical and regulatory standards.

Public Health Service (PHS): a key component of the United States Department of Health and Human Services that oversees various agencies focused on public health.

Research: a systematic investigation designed to develop or contribute to generalizable knowledge relating broadly to public health. The term encompasses basic and applied research and product development and includes any such activity for which Federal Funding is available through a grant, contract, or cooperative agreement.

Significant Financial Interest (SFI): anything of monetary value, including, but not limited to, salary or other payments for services (e.g., consulting fees or honoraria); equity interests (e.g., stocks, stock options or other ownership interests); and intellectual property rights (e.g., patents, copyrights and royalties from such rights). The term does not include:

- a. Salary, royalties, equity interest, including stock, stop options, or other equity interest or other remuneration from HDT Bio.
- b. Income from seminars, lectures, or teaching engagements sponsored by public or nonprofit entities
- c. Income from service on advisory committees or review panels for public or nonprofit entities
- d. An equity interest that when aggregated for the covered individual and the covered individual's spouse and dependent children, meets both of the following tests: 1) Does not exceed \$5,000 in value as determined through reference to public prices or other reasonable measures of fair market value, and 2) does not represent more than a five percent (5%) ownership interest in any single entity; or
- e. Salary, royalties, or other payments that when aggregated for the covered individual and the covered individual's spouse and dependent children over the next 12 months are not expected to exceed \$5,000.

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6. Procedure

6.1. Disclosure Requirements

Investigators must disclose all SFIs:

- At time of hire.
- Prior to the submission of a PHS-funded proposal if a disclosure is not on file within the prior 12 months.
- At least annually during the period of the award.
- Within 30 days of discovering or acquiring a new SFI.

Disclosures must include interests of the Investigator, their spouse/domestic partner, dependent children, and unmarried adults residing in the same household who are financially interdependent with the investigator (e.g., sharing a joint bank account, mortgage, or investments)

6.2. Disclosure Process

At time of hire, all HDT personnel including directors, officers, and employees must complete a financial conflict of interest disclosure. This process is completed via the Significant Financial Interest Disclosure Form, submitted in HDT's Human Resources Information System (HRIS).

For any individuals listed as senior/key personnel on grants, an annual disclosure must be completed each January, following the process above. This process is initiated by HR, upon receiving a list of senior/key personnel from the Grants Management Team.

In addition, if an investigator discovers or acquires a new SFI outside of the reporting events above, the individual must submit another disclosure to HR via the process above. This disclosure must be completed within 30 days of discovery or acquisition of the new SFI.

For new investigators without a disclosure on file in the past 12 months, an SFI disclosure must be submitted to HR at either the time of application or the time at which the individual is added as senior/key personnel on an existing grant.

6.3. Review and Management


FCOI disclosures will be reviewed by HDT's Risk Management Committee during the next applicable meeting following submission of an SFI Disclosure Form by any personnel. The committee will review all disclosures to determine if an FCOI exists. If an FCOI is identified, a management plan will be developed, which may include:

- Disclosure of the conflict to PHS.
- Monitoring of the research by independent reviewers.
- Modification of the research plan.
- Disqualification from participation in the conflicted portion of the research, including abstaining from procurement processes where SFI exists.

6.4. Reporting to PHS

When financial conflict is noted, the Grants Management Team will submit an FCOI report to the PHS awarding component:

- Prior to engaging in PHS-funded research.

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- Within 60 days of identifying an FCOI during the award period.
- Annually for ongoing FCOIs.

The contents of the report must comply with the requirements found in 42 CFR Part 50.

6.5. Training

All Investigators must complete FCOI training:

- Prior to engaging in PHS-funded research.
- At least every four years.
- Within 30 days if the business revises its FCOI policy or an Investigator is found noncompliant.

6.6. Record Retention

All FCOI-related records will be retained for at least three years from the date of final payment or as required by federal regulations.

6.7. Enforcement and Noncompliance

Failure to comply may result in disciplinary action up to and including termination as determined by the Risk Management Committee, and reporting to the PHS agency.


Retrospective reviews will be conducted if an FCOI was not disclosed in a timely manner.





7. Revision History

Version No	Change	Justification	Effective date
01	New Document	Updating HDT's FCOI policy to conform to current practice.	Upon final approval

8. Approvals

Author: Alyssa Camp Director, Grants Management	Signed by:   Signer Name: Alyssa Camp Signing Reason: I approve this document Signing Time: 11/12/2025 1:30:22 PM PST 293DE50E59274A9F94116DF3075317D9
Reviewer: Malcolm Duthie SVP Research Operations	Signed by:   Signer Name: Malcolm Duthie Signing Reason: I approve this document Signing Time: 11/18/2025 9:57:01 AM PST 4948BDDCCAB44A7D847F6D93BA681630

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Reviewer: Curt Malloy SVP, Strategic Operations	Signed by:   Signer Name: Curt Malloy Signing Reason: I approve this document Signing Time: 11/17/2025 8:54:35 AM PST 0C6BD69B4E1749CBB8C4D9F39834C1F0
Reviewer: Barbara Purmort Director, Human Resources	Signed by:   Signer Name: Barbara Purmort Signing Reason: I approve this document Signing Time: 11/12/2025 1:57:43 PM PST E7859BA96CB84D48BFB61D7A25D10FFF