ReNeuroGen LLC (DBA: rngen)
Financial Conflict of Interest (FCOI) Policy
Effective Date: [April 18th, 2017]

1. **Purpose**

ReNeuroGen LLC (DBA: rngen) is committed to maintaining the highest ethical standards in conducting research and ensuring transparency in NIH-funded projects. This Financial Conflict of Interest (FCOI) Policy is established in compliance with 42 CFR Part 50 Subpart F and applies to all employees, investigators, consultants, and contractors participating in NIH-funded research at ReNeuroGen LLC.

2. **Scope**

This policy applies to all individuals responsible for designing, conducting, or reporting research funded by the National Institutes of Health (NIH), including SBIR/STTR grants. Investigators must disclose any significant financial interests (SFI) that may present an actual or potential financial conflict of interest.

3. **Definition of Financial Conflict of Interest (FCOI)**

A Financial Conflict of Interest (FCOI) exists when a significant financial interest (SFI) could directly and significantly affect the design, conduct, or reporting of NIH-funded research.

A Significant Financial Interest (SFI) includes, but is not limited to:

- Equity interests (e.g., stock, stock options) in a publicly traded entity valued at $5,000 or more.
- Ownership interests in a privately held entity.

- Payments (e.g., consulting fees, honoraria, royalties) exceeding $5,000 in the past 12 months.
- Intellectual property rights (e.g., patents, licensing revenue).
- Reimbursed or sponsored travel exceeding $5,000 annually.

4. **Disclosure Requirements**

- Investigators must disclose any SFI prior to engaging in NIH-funded research and annuallythereafter.
- Any new SFIs acquired during the research project must be disclosed within 30 days.
- Disclosures must be reviewed by ReNeuroGen LLC's designated FCOI Official to determine if a FCOI exists.

5. **Management of Financial Conflicts of Interest**

If an FCOI is identified, ReNeuroGen LLC will take appropriate steps to mitigate the conflict, which may include:

- Public disclosure of the conflict in research presentations/publications.
- Modification of research plans to minimize bias.
- Divestiture of financial interests.
- Severance of relationships that create conflicts.
- Independent monitoring of research activities.

6. **Reporting to NIH**

ReNeuroGen LLC will report any identified FCOIs to NIH prior to the expenditure of funds and within 60 days of discovering a new FCOI. These reports will include the investigator's name, the nature of the conflict, and actions taken to manage it.

7. **Public Accessibility**

ReNeuroGen LLC will make this FCOI Policy publicly accessible on its website. In compliance with

NIH regulations, information concerning identified FCOIs related to NIH-funded research will be provided within five business days of a request.

To request FCOI-related information, please contact:

Email: snaylor@rngen.com

Phone: 414-420-0977

Address: ReNeuroGen LLC, 2160 San Fernando Drive, Elm Grove, WI 53122.

8. **Training Requirements**

All Investigators must complete NIH-compliant FCOI training prior to engaging in NIH-funded research and at least every four years thereafter. Training is also required when policy revisions occur or when an investigator is found non-compliant.

9. **Non-Compliance and Enforcement**

Failure to comply with this policy may result in disciplinary action, including removal from NIH-funded projects. ReNeuroGen LLC will notify NIH of non-compliance and corrective actions taken.

10. **Policy Review**

This policy will be reviewed annually and revised as needed to ensure compliance with NIH regulations

Approved by:

Stephen Naylor PhD

Chief Executive Officer

ReNeuroGen LLC

[March 1st 2025]