

# **Conflict of Interest (COI) Policy**

**Forager Station, Inc.**

Effective: August 22, 2025

## **Purpose**

Forager Station, Inc. is committed to conducting research and business activities with integrity and transparency. This policy ensures that the design, conduct, and reporting of research funded by external sponsors will be free from bias resulting from financial conflicts of interest.

## **Who It Covers**

This policy applies to all investigators and key personnel who are responsible for the design, conduct, or reporting of sponsored research, including employees, consultants, and collaborators.

## **Disclosure of Financial Interests**

- All investigators must disclose any significant financial interests (e.g., salary, consulting fees, equity, intellectual property rights, or sponsored travel) that could reasonably appear to be related to their responsibilities at Forager Station, Inc..
- Disclosures must be made before submitting a sponsored research proposal, updated annually, and within 30 days of any new significant financial interest.

## **Conflict of Interest Review**

- Disclosures will be reviewed by the designated compliance officer (currently the CTO) to determine if a financial conflict of interest (FCOI) exists.
- If an FCOI is identified, Forager Station, Inc. will implement a management plan, which may include public disclosure, modification of duties, independent monitoring, or reduction/elimination of the financial interest.

## **Prohibited Activities**

- Participation in any foreign talent recruitment program prohibited by U.S. law or federal research agencies.

## **Conflict of Interest Plan and Procedures**

This policy shall apply to research grant and cooperative agreement projects sponsored by various federal agencies.

### **1) Meet Federal Disclosure Requirements**

This policy implements federal requirements pertaining to the DOE Interim COI Policy and 2 CFR 200.112. This policy also implements federal requirements contained in the National Science Foundation's "Investigator Financial Disclosure Policy" and other policies as may be promulgated by federal funding agencies. These federal requirements are applicable to all proposals for extramural awards submitted to these federal agencies. This policy implements the regulatory requirements provided in the grant and cooperative agreement regulation 42 CFR Part 50 Subpart F.

Updated disclosures must be completed by the investigator before any new proposals are submitted.

### **2) Read Conflict of Interest Policy**

Investigators must read the conflict of interest policy prior to engaging in sponsored research and at least every four years thereafter, or sooner if the policy is revised or noncompliance is found. The goal of the policy is to:

Inform the Investigator about the Company's FCOI policy

Establish the Investigator's responsibility to disclose SFIs per this policy and the relevant regulations

### **3) Public Accessibility**

In compliance with federal regulations, information on identified financial conflicts of interest for senior/key personnel will be made publicly available by Forager Station, Inc. within five business days of a written request and will remain available for at least three years.

### **4) Compliance**

Failure to disclose financial interests or comply with management plans may result in disciplinary action and could affect eligibility for participation in sponsored projects.

## **5) Review**

Based on information provided in the disclosure, the designated compliance officer may determine that there is no reasonable basis on which to conclude that a project could affect the financial interest and/or that the financial interest is not likely to directly and significantly affect the design, conduct, or reporting of the project. In this case, a record should be made of the designated compliance officer's action and the project can proceed without further review.

If the designated compliance officer reasonably concludes that a project could have an impact on financial interest and that the financial interest could affect directly and significantly the design, conduct or reporting of the project, the basis for the finding will be documented and the designated compliance officer in conjunction with inputs from company employees may determine the actions that are necessary to manage the FCOI.

Corrective action may include: Public disclosure, Disclosure of financial interests to co-investigators and research personnel working on the project, compliance with third party review of project research design or plan, modification of research or project plan, or reassignment of investigators to other duties.