



Financial Conflicts of Interest Policy – Summary

CND Life Sciences, Inc. (CND) is committed to ensuring that any research it participates in is scientifically sound and trustworthy. As part of this commitment, CND has implemented a Financial Conflict of Interest Policy that is designed to detect and eliminate biases, or undue influences, arising from a research participant’s financial interests that may affect, or be affected by, the research. The purpose of the Policy is to promote proactive disclosure and management of conflicting financial interests held by CND employees and contractors who participate in the design, conduct, or reporting of research, including research performed under the auspices of the Public Health Service (PHS).

In accordance with the Policy, and as required by law, CND will report all of its investigators disclosed financial conflicts of interests (FCOI), and certify the implementation of a management plan for each such interest, before the expenditure of any research-related PHS funds (or within 60 days of identifying a new FCOI or adding an investigator to a research team). For as long as the research continues, on at least an annual basis, CND will update its reports to provide the status of any disclosed FCOIs and material changes made to any management plans.

CND will require its investigators to undergo training with regard to their obligations under the Policy, before they engage in research and at least every four years thereafter. Additional trainings will be required any time CND makes changes to the Policy or determines that any investigator has not complied with the Policy.

CND’s FCOI reports, updates, and (if necessary) results of any retrospective reviews will be submitted within the timeframes prescribed by law to the National Institutes of Health (NIH). CND will make publicly available information concerning FCOIs held by its senior or key research personnel, within five business days of a written request for such information.