Individual and Institutional Conflicts of Interests Policy, 10282

Policy/Procedure

PURPOSE:

To assure the highest standards of ethical behavior, scientific integrity, compliance with fiduciary duties, and responsibility to the community.

POLICY:

Seattle Children's will identify and manage any actual, potential or perceived conflicts of interest that may affect or appear to affect decisions made on behalf of Seattle Children's or its related or controlled organizations, or as part of its clinical, research, educational or advocacy activities.

PROCEDURE:

I. Covered Persons. This Policy applies to the following individuals, who are called "Covered Persons" in this Policy:

   A. Trustees, officers, and members of any Board committees of the following entities:
      1. Seattle Children's Healthcare System (SCHS)
      2. Seattle Children's Hospital (SCH)
      3. Seattle Children's Hospital Foundation
      4. Seattle Children's Hospital Guild Association
      5. Any other entity that is part of the Seattle Children's Healthcare System, as determined by the SCHS Board of Trustees;

   B. Any employee of any entity listed in Section I.A above:
      1. holding a position of "Director" or higher (or the functional equivalent if such title is not used);
      2. holding a position in the Sourcing department who approves or recommends vendors;
      3. holding a position in the Intellectual property Core (IPC);
      4. holding a position in the Office of Research Compliance (ORC);
C. Members of the SCH Medical Staff who hold an appointment as Department Director or Division Chief (or the functional equivalent if such title is not used); all SCH Medical Staff who are employed or engaged to furnish medical direction services to SCH; and all members of the Medical Staff Medical Executive Committee;

D. Members and staff of any SCH Institutional Review Board or equivalent organization;

E. Any employee of SCH or faculty member of another institution who is engaged in research at facilities owned, leased or operated by SCH and who is involved in the design, conduct or reporting of research;

F. Any individual, including any SCRI researcher, receiving discretionary funding for operating or capital expenses of $1,000,000 or more in the aggregate from any entity listed in Section I.A above in conjunction with a recruitment or retention offer, and who shall, for the purposes of this Policy only, be subject to all requirements applicable to an employee holding the position of "Vice President" or higher (or the functional equivalent if such title is not used) with any entity listed in Section I.A above;

G. Members of the SCH Pharmacy and Therapeutics Committee;

H. Solely for the purposes of Section II.B (Duty of Loyalty), any individual defined in Section II.B as a Covered Person; and

I. Any other person as determined by Seattle Children's Chief Executive Officer.

J. In addition, the officers of any Guild required to file IRS Form 990 will provide information necessary to complete the Form 990, but are not otherwise subject to this Policy.

II. Duties of Covered Persons.

A. Duty of Care. Every Covered Person shall discharge her or his duties in good faith and with the degree of care that an ordinarily prudent person in a like position would exercise under similar circumstances.

B. Duty of Loyalty. For the purposes of this Section II.B, all workforce members (all employees of an entity listed in Section I.A and all members of the research staff and the SCH Active Medical Staff) are considered "Covered Persons." Unless such persons separately meet the definition of Covered Person in Sections I.A through I.I above, they are not otherwise subject to this Policy. Every Covered Person must act with loyalty to Seattle Children's. No Covered Person may use his or her corporate position to make personal profit or gain other personal advantage. Covered Persons may not engage in transactions with Seattle Children's that confer unfair gains or secret profits. Any business relationship with a Covered Person shall be subject to approval without any participation by the affected Covered Person or Persons. Covered Persons may not personally take advantage of a business opportunity that is offered to Seattle Children's, or to the Covered Person by virtue of his or her position with Seattle Children's, unless the Board (in cases where the Covered Person is a trustee) or management (in cases where the Covered Person is not a trustee) determines (after a disinterested and informed evaluation) not to pursue that opportunity.

1. No Ownership or Investment Interest in Seattle Children's Spin Out Entities. Covered Persons and their immediate family members are prohibited from having an ownership or investment interest, whether through equity, debt or other means, directly in a Seattle Children's Spin Out, absent exceptional circumstances. Any proposed ownership or investment interest described in this Section must be reviewed, evaluated, and pre-approved by the Research Conflict of Interest Committee (RCoIC) (as defined in the Office of Research Compliance Financial Conflicts of Interest Policy (ORC-003) or the Institutional Conflict of Interest
Committee (ICOIC) (defined in Section VIII.A below) and by the SCHS Audit and Compliance Committee, as applicable.

2. **Immediate Family Member.** For purposes of this Section II.B, a Covered Person's immediate family means a spouse or domestic partner, and dependent children.

3. **Seattle Children's Spin Out Entity.** For purposes of this Policy, a Seattle Children's "Spin Out" means any entity founded or controlled by any entity listed in Section I.A., or whose business is driven largely by intellectual property owned by or licensed from any entity listed in Section I.A. The determination whether an entity is a Seattle Children's Spin Out Entity shall be made by the Chief Legal Officer.

C. **Confidentiality.** No Covered Person shall disclose any non-public information related to Seattle Children's business to any person or entity unless disclosure is related to the legitimate business of Seattle Children's. Each Covered Person will annually sign a Nondisclosure and Confidentiality Statement in a form approved by the Chief Legal Officer.

D. **Conflicts of Commitment.** Conflicts of commitment arise when outside activities and interests or interfere with the performance of a Covered Person's duties to Seattle Children's.

1. **No Seattle Children's Resources Used in Outside Activities.** Seattle Children's resources, including personnel, facilities, equipment and supplies are to be used in furtherance of Seattle Children's business interests and not used by Covered Persons for their own personal, outside interests and activities. Generally, Covered Persons who are employed by an entity described in Section I.A above should not engage in outside business activities during their working time at Seattle Children's. For purposes of this Section, outside business activities do not include those undertaken at Seattle Children's request or as required by a Covered Person's role with Seattle Children's.

2. **Board Service.** Any Covered Person who holds a position of "Vice President" or higher (or the functional equivalent if such title is not used) with any entity listed in Section I.A above is **strongly discouraged** from serving on the governing body of any entity that is not organized as a nonprofit, tax-exempt organization (excluding any wholly owned subsidiary that is part of SCHS). Such Covered Person may participate on such governing body only if the activity is pre-approved by (a) the Covered Person's supervisor; (b) the ICOIC as described in Section VIII.A; and (c) the SCHS Audit and Compliance Committee.

E. **Individual Conflicts of Interest.** Covered Persons may not engage in transactions or undertake positions with other organizations that involve a Financial Interest or an Outside Interest (as defined in Section IV this Policy) without prior disclosure to Seattle Children's and approval by disinterested and informed members of the Board (in cases where the Covered Person is a trustee) or management (in cases where the Covered Person is not a trustee). The process for evaluating and managing individual conflicts of interest is described in detail below.

F. **Limited Prohibition on Gifts.**

1. No Covered Person shall accept any gift, entertainment, or other favor where such acceptance might create the appearance of influence on the Covered Person in the performance of his or her duties. No Covered Person shall receive, accept, take, seek, or solicit, directly or indirectly, anything of economic value as a gift, gratuity, or favor from a person if it could reasonably be expected that the gift, gratuity, or favor would influence, or would appear to influence, the vote, action, or judgment of the Covered Person, or be considered as part of a reward for action or inaction.
2. The acceptance of any gift, entertainment, or other favor from an entity selling goods or services to Seattle Children's presents the appearance of influencing a Covered Person. No Covered Person involved in the acquisition of goods or services shall accept any gift, irrespective of value, from any person or entity providing goods or services within the Covered Person's scope of responsibility.

3. No Covered Person may accept any gift of cash or a cash equivalent (such as a gift card) from any person where such acceptance might create the appearance of influence on the Covered Person in the performance of his or her duties.

4. A Covered Person may accept:
   a. Gifts from patients of no more than nominal value (though acceptance of such gifts is discouraged);
   b. Unsolicited advertising or promotional items of nominal value, such as pens and note pads (though acceptance of such gifts is discouraged);
   c. Unsolicited tokens or awards of appreciation in the form of a plaque, trophy, desk item, wall memento, or similar items;
   d. Informational material, publications, or subscriptions related to the recipient's performance of official duties; and
   e. Food and/or beverages provided by a third party selling goods or services to Seattle Children's or purchasing goods or services from Seattle Children's in conjunction with a bona fide education or business presentation or discussion provided the food and/or beverage are provided on an occasional and infrequent basis, and are modest in value.

III. Financial Interest. A financial interest (for purposes of this Policy, a "Financial Interest") exists whenever:

   A. A Covered Person has, directly or indirectly, through business, investment or family:

      1. An ownership or investment interest in any entity with which Seattle Children's has a business relationship, including any entity in which Seattle Children's owns equity. For purposes of this Policy, an "ownership or investment interest" in an entity may be through equity, debt, or other means;

      2. A relationship where the Covered Person receives any remuneration from any other entity in which Seattle Children's has a business relationship, including any entity in which Seattle Children's owns equity. For purposes of this Policy a "business relationship" with an entity shall include, but not be limited to, a contractual research relationship or an intellectual property arrangement;

         a. Remuneration includes stock ownership, stock options, equity interests, stock warrants, royalties, consulting fees, salary or benefits, loans, sponsored travel, and speaker fees;

         b. In the case of a Covered Person listed in Sections 1.C through 1.I above, remuneration does not include any salary or benefits amounts received from the University of Washington, Children's University Medical Group, Seattle Cancer Care Alliance, or Fred Hutchison Cancer Research Center;

      3. A potential ownership or investment interest in, or compensation arrangement with, or relationship involving receipt of any remuneration from, any entity or individual with which Seattle Children's is negotiating a business relationship, including any entity in which Seattle Children's is negotiating an equity interest;
4. **Authority or influence** with respect to any such entity's business relationship with Seattle Children's; or

5. An **ownership interest in any entity competing with Seattle Children's** having a value in excess of 10% of the net worth of such entity or a position with any competing entity that confers decision-making authority influence with respect to such entity;  
   6.1 For purposes of Section III.A, owning less than 10% of the securities (or of securities representing less than 10% of the net worth) of a publicly traded entity does **not** present a conflict of interest so long as the fair market value of the interest is less than (i) 10% of the Covered Person's net worth at year end, or (ii) the Covered Person's annual income.  

For the purpose of this Section III, an entity in which Seattle Children's owns equity does not include holdings in Seattle Children's investment portfolio comprised of the operating fund portfolio and the long-term endowment portfolio.

B. A Covered Person has **accepted any gift, entertainment, or other favor** in violation of this Policy.

IV. **Outside Interest.** An outside interest (for purposes of this Policy, an Outside Interest) exists whenever:

A. A Covered Person serves as a member of the governing body of an entity or holds a position of authority or responsibility to act in the best interest of that entity, including as a director, trustee, partner, officer or manager, subject to the limitations set forth in Section II.D above;

B. A Covered Person provides services (whether or not compensated) to another entity that does or seeks to do business with Seattle Children's or engages in any other activity that may give the appearance of impairing independence of judgment in the exercise of the Covered Person's responsibilities to Seattle Children's.

V. **Institutional Conflicts.** An institutional conflict of interest (ICOI) involves a situation where the Institutional Interests (defined in Section V.A) of any entity described in Section I.A above or the Financial or Outside Interest of a Key Covered Person (defined in Section V.B) may result in inappropriate influence or the perception of such influence over the activities of the entity, including affecting or reasonably appearing to affect the institutional processes for the design, conduct, reporting, review, or oversight of human subjects research. Seattle Children's is committed to ensuring that its relationships with industry do not result in inappropriate influence or the perception of inappropriate influence.

A. **Institutional Interests.** An Institutional Interest for the purposes of this Policy means: (1) equity interests (stocks, stock options, warrants or other investment interest) held by any entity described in Section I.A above; (2) the receipt by any entity described in Section I.A above of royalties, fees, milestone payments or any other one-time or periodic payment or the right to receive any such payment in the future (other than payments for the performance of services); (3) the appointment of a Key Covered Person to serve as an officer or director of an entity in a business relationship with, sponsoring or funding human subjects research at, or whose products or services are being tested in such research at any entity described in Section I.A above; and (4) such other external relationships or Financial Interests that could directly and significantly affect human subjects research at Seattle Children's.

B. **Key Covered Persons.** Key Covered Persons for the purposes of this Policy means all individuals holding a title of Vice President or higher (or the functional equivalent if such title is not used) with any entity described in Section I.A.

C. **Initial Evaluation.** ICOIs shall be initially evaluated by the Office of the Chief Legal Officer and referred as appropriate to the ICOIC for additional review as set forth in Section VIII.A below.

D. **ICOIs involving Human Subjects Research.** With regard to ICOIs involving human subjects
research at Seattle Children's, there is a rebuttable presumption that Seattle Children's will not participate in human subjects research under circumstances in which the Seattle Children's entity at which the research is conducted has an ICOI, except in compelling circumstances. The ICOIC, in consultation with the RCOIC, shall make an initial determination whether the presence of compelling circumstances exist. The compelling circumstances analysis will generally evaluate the nature of the science, the nature of the ICOI, how closely the ICOI is related to the research, the degree of risk that the research poses to human subjects and the degree to which the ICOI may be affected by the research, and whether the Seattle Children's entity is uniquely qualified to conduct the research and safeguard the welfare of human subjects. The ICOIC, in consultation with the RCOIC, shall also make an initial determination whether the conflict may be effectively managed. The SCHS Audit and Compliance Committee shall have final decision-making authority.

E. **Use of Clinical Products, Devices or Services.** With regard to the use of products, devices or services at Seattle Children's not in the context of a research study in which an ICOI exists, the ICOIC shall oversee a process to ensure that objective standards are established for the clinical use of such product, device or service by Seattle Children's healthcare providers and that such providers follow objective standards for clinical use. The ICOIC will use the following framework to accomplish this oversight. No person with an ICOI may participate in the process outlined below without approval and monitoring by the ICOIC.

1. **Establishment of Clinical Standards.** The Chief Medical Officer (provided s/he has no personal conflict of interest) in consultation with the Chief Legal Officer shall make a recommendation to the ICOIC with respect to the identification of a qualified, disinterested group of clinical professionals (e.g., Seattle Children's Clinical Effectiveness program) who can establish standards for appropriate clinical use of the product, device or services in which an ICOI exists. Depending on the nature of the ICOI, this group may include clinicians wholly independent of Seattle Children's. Development of these clinical standards should include an opportunity for clinicians to comment on the standards developed. If the Chief Medical Officer has a personal conflict of interest, the Associate Chief Medical Officer shall replace the Chief Medical Officer in this process.

2. **Education.** The Chief Medical Officer shall assure appropriate education about the clinical standards developed under Section E.1 above.

3. **Audit of Actual Practice.** The Chief Medical Officer in consultation with the Chief Legal Officer will establish a mechanism for a periodic audit of clinical care to determine whether clinicians are following the established standards, and if not, why not.

4. **Transparency to Patients.** Seattle Children's will be transparent to the patient or the patient's legal decision-maker about the ICOI, including making an appropriate written disclosure. For the purpose of this Section V, an entity in which Seattle Children's owns equity does not include holdings in Seattle Children's investment portfolio comprised of the operating fund portfolio and the long-term endowment portfolio.

VI. **Disclosure.**

A. A Covered Person shall disclose to Seattle Children's (as described below):

   1. Any Financial Interest; and
   2. Any Outside Interest.

B. When engaged in teaching, research or publication activities, a Covered Person shall disclose to the audience any Financial Interest or Outside Interest related to the activity, and also any gifts, grants,
or other financial support received in connection with the activity. Disclosure may be through written materials, oral statements, or informational slides. Additional requirements pertaining to research activities are set forth in applicable Office of Research Compliance (ORC) policies.

C. With respect to ICOIs, in addition to disclosures from Key Covered Persons as required by this Policy, information on Institutional Interests shall be reported by the Intellectual Property Core (IPC) to the Office of Research Compliance and the Chief Legal Officer for appropriate evaluation. In addition, senior leaders shall periodically report to the Chief Legal Officer information pertinent to the identification of Institutional Interests.

D. Covered Persons are strongly encouraged to disclose at any time a matter that may raise a potential conflict of interest and seek guidance or review from the Compliance Program or the Chief Legal Officer.

VII. Process for Disclosure.

A. Each Covered Person shall disclose any Financial Interest and any Outside Interest and any other interest described in Section VI existing at the time an individual becomes a Covered Person, immediately upon becoming a Covered Person;

B. disclose any Financial Interest and any Outside Interest and any other interest described in Section VI arising while a Covered Person, immediately upon the existence of the Financial Interest, Outside Interest or other interest described in Section VI;

C. annually complete and submit to the Chief Legal Officer a survey on Financial Interests, Outside Interests and other interests described in Section VI, in such form as the Chief Legal Officer determines is necessary and appropriate to accomplish the purposes of this Policy and any other requirements of applicable law or regulation, and which survey may be in electronic or print format, as appropriate.

The Intellectual Property Core (IPC) shall provide notice to the Office of Research Compliance and the Chief Legal Officer upon execution of commercial transactions involving Seattle Children's acquisition of equity and/or right to receive milestone payments, licensing fees, or royalties in consideration for licensing intellectual property. In addition, the Investment Director shall notify the Chief Legal Officer when Seattle Children's acquires or divests of an Institutional Interest.

VIII. Evaluation and Management of Disclosures. The Chief Legal Officer shall generally oversee the review of all disclosures to determine if a management plan for the interest disclosed is necessary or advisable to meet the purposes of this Policy or if the disclosure requires further review by the RCOIC or ICOIC in accordance with the Office of Research Compliance Financial Conflicts of Interest Policy (ORC-003) and this Policy, as applicable. The Chief Legal Officer works closely with the Office of Research Compliance with regard to conflicts of interest involving research. The Office of Research Compliance generally takes the lead with regard to evaluating and referring such matters to the RCOIC, as applicable, except in the case of ICOIs involving research, in which case, the Chief Legal Officer takes the lead and refers such matters to the ICOIC for evaluation and management.

A. Institutional Conflict of Interest Committee (ICOIC). Matters involving actual or potential ICOIs, investments, or Financial Interests in Seattle Children's Spin Outs and leaders' board service as described in Section II.D.2 will be disclosed, reviewed, and resolved by the ICOIC in accordance with this Policy. The Committee shall be composed of:

1. One SCHS Trustees who serves on the SCHS Audit and Compliance Committee to be appointed by the SCHS Board Chair;
2. The Senior Vice President and Chief Clinical Officer
3. The Senior Vice President and Chief People Officer

4. The Vice President and Chief Compliance Officer

5. The Senior Vice President and Chief Legal Officer.
   The Board Chair, in consultation with the CEO, shall appoint one member of the ICOIC as chair.
   The ICOIC shall develop a charter subject to periodic review by the SCHS Audit and Compliance Committee.
   For all matters referred to it, the ICOIC will make findings as to whether an actual, potential, or perceived conflict exits and how it might be resolved. The ICOIC's recommendations will be forwarded to the SCHS Audit and Compliance Committee for a final determination. The ICOIC will share relevant information and determinations with the RCOIC to assure appropriate coordination of the work of each such committee.

B. Covered Person is Trustee, Officer, or Member of Committee: Except for matters addressed by Section VIII.A, where the Covered Person is a person described in Section I.A of this Policy, the Chief Legal Officer will inform the Chair of the Board of Trustees of the existence of the Financial Interest or Outside Interest, as applicable, and shall create a management plan requiring the affected person not to participate in any discussion of or decision regarding the Financial Interest or Outside Interest. Where the Covered Person is the Chair of the Board of Trustees, the Chief Legal Officer will similarly inform the Chair of the Audit and Compliance Committee. If the Chair of the Board, or the Chair of the Audit and Compliance Committee, as the case may be, determines that additional steps are necessary in the circumstances to meet the purposes of this Policy, she or he shall refer the matter to the Audit and Compliance Committee for review and action. The Committee shall have the authority to take additional action to meet the purposes of this Policy, and shall report any such action taken to the full Board.

C. Covered Person is not a Trustee: Except for matters addressed by Section VIII.A, where the Covered Person is not a person described in Section I.A of this Policy, the Chief Legal Officer shall create a management plan requiring the Covered Person not to participate in any discussion of or decision regarding the Financial Interest or Outside Interest disclosed, and shall inform the appropriate Seattle Children's official of the existence of the Financial Interest or Outside Interest and the terms of the management plan. The appropriate Seattle Children's official is:

1. for employees of Seattle Children's, the Covered Person's supervisor (except that if the Covered Person is the Chief Executive Officer, the appropriate Seattle Children's official is the Chair of the Board of Trustees),

2. for a Covered Person engaged in research at Seattle Children's, the President of the Research Institute, and

3. for a member of the Medical Staff holding an appointment making her or him a Covered Person, the Chief Medical Officer or other Seattle Children's executive with oversight responsibility for medical direction services.

   The appropriate Seattle Children's official may determine that additional safeguards are required to meet the purposes of this Policy, and if so shall work with the Chief Legal Officer to develop and implement such safeguards. For any Covered Person engaged in research at Seattle Children's, the Chief Legal Officer shall work in cooperation with the Research Integrity Officer to review and take action on any annual survey on Financial Interests submitted by any such person.

D. Avoiding Transactions or Events Involving Conflicts. In all cases, in addition to requiring a
Covered Person with a Financial Interest or Outside Interest not to participate in any discussion of or decision regarding the disclosed Financial Interest or Outside Interest, the Chair of the Board, the Chair of the Audit and Compliance Committee, or the appropriate Seattle Children's official, as the case may be, will review the facts and circumstances of the specific case, and consider all relevant factors in determining whether additional actions are necessary to meet the purposes of this Policy. Such additional actions may include, without limit:

1. Alternatives to any proposed transaction or business relationship that do not involve a Financial Interest or Outside Interest of a Covered Person;

2. The possibility of competitive bidding;

3. The possibility of requiring divestiture of the Financial Interest or cessation of the Outside Interest;

4. The benefit, if any, to the Covered Person, and the needs of Seattle Children's, regarding the disclosed Financial Interest or Outside Interest.

E. **Report to Audit and Compliance Committee.** The Audit and Compliance Committee will oversee the implementation of this Policy. The Chief Legal Officer shall report annually to the Committee in general the disclosures made under this Policy and the actions taken with respect to them. If the Audit and Compliance Committee determines that additional steps are necessary in the circumstances, the Committee shall have the authority to take additional action to meet the purposes of this Policy. Specific actions by the Audit and Compliance Committee regarding any management plan, and the disclosures making it necessary, shall be recorded in the minutes of the Committee.

F. **Actions by Audit and Compliance Committee.** Whenever under this Policy the Audit and Compliance Committee takes action to implement, modify or enforce a management plan, only those members of the Committee who are disinterested in the matter under review shall act. In addition, if a transaction (including a proposed transaction) involves a conflict of interest involving a member of the Board or the Chief Executive Officer, the disinterested members of the Committee, being informed of the facts, shall determine whether the transaction or event is fair to Seattle Children's. No interested person may participate in the Committee's decision or be present at the Committee's meeting when the Committee's evaluation and decision are made, but interested persons may respond to questions about the matter. If the Committee determines that the transaction or event is unfair to Seattle Children's or jeopardizes the Covered Person's observance of the duty of loyalty, the Committee shall disapprove the transaction or event (if pending), may declare any existing pertinent contract or transaction void, or take such other action as the Committee deems appropriate. In addition, if the Committee believes a Covered Person has failed to disclose a Financial Interest or Outside Interest, the Committee shall inform the Covered Person of the basis for such a belief, and afford the Covered Person an opportunity to explain the failure to disclose. If the Committee determines that the Covered Person has in fact failed to disclose a Financial Interest as required by this Policy, it shall take appropriate disciplinary and corrective action.

G. **Corrective Measures.** Any Covered Person who engages in a violation of this Policy or pursues a transaction or event following disapproval by the Audit and Compliance Committee or the appropriate Seattle Children's official (in other cases) may, in the discretion of the Committee or appropriate Seattle Children's official, in accordance with their respective authority, be removed immediately from her or his duties with Seattle Children's, including duties as a trustee, terminated in her or his employment, or both.

H. **Committee Records.** The minutes of the ICOIC and the SCHS Audit and Compliance Committee
will contain:

1. the names of the persons who disclosed or otherwise were found to have a Financial Interest or Outside Interest in connection with an actual or possible conflict of interest, the nature of the Financial Interest or Outside Interest or any ICOI, any action taken to determine whether a conflict of interest was present, and the committee's decision as to whether a conflict of interest in fact existed;

2. the names of the persons who were present for discussions and votes relating to the transaction or arrangement, the content of the discussion, including any alternatives to the proposed transaction or arrangement, and a record of any votes taken in connection with it.

3. in the case of the Audit and Compliance Committee, information about specific actions by the Committee regarding any management plan, and the disclosures making it necessary, which shall be available to and provided on request of any Trustee.

See also:

Administrative Policies and Procedures:

- Policy 11685, Gift Acceptance
- Policy 11791, Institutional Ownership and Management of Equity Obtained in Research and Intellectual Property Transactions

Corporate Compliance Policies and Procedures:

- Policy 12265, Conflict of Interest

Research Forms and Policies:

- Policy IPC-100, Intellectual Property Policy
- Policy ORC-003, Financial Conflicts of Interest Policy

APPROVED BY:

- Jeff Sperring, MD, Chief Executive Officer, August 21st, 2019
- Board of Trustees, May 22nd, 2019

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Attachments: No Attachments

Approval Signatures

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<td>Lisa Hayward: Senior Vice President &amp; Chief Legal Officer</td>
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