

ADDGENE, INC.
REVIEW & ASSESSMENT OF FINANCIAL INTERESTS DISCLOSURE FORM
THIS FORM MUST BE COMPLETED PRIOR TO EXPENDITURE OF SPONSOR FUNDS

To be completed by the Investigator's or Senior / Key Personnel's administrative head (Executive Director, Chief Financial Officer), or, if unavailable, other personnel or groups with sufficient authority within Addgene. ***This form cannot be completed by those persons managing or directing the publicly funded research or other senior / key personnel named on the applicable grant.***

Submitted Financial Interest Disclosure (attached hereto)

Tracking No.	Submitter:
Submitter Organization:	
Research Title / Description:	

Reviewer Information and Assessment for Significant Financial Interests (SFI)

Name:	Job Title:
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Tick **one** box below as applicable:

	No SFI. I have reviewed the SFI form. I agree and acknowledge that the submitter has no significant financial interests related to their Addgene responsibilities.
	No financial conflicts of interests after consultation. I have reviewed the SFI form, and in consultation with the submitter, have determined that the submitter has no potential financial conflicts of interests.
	Actual or apparent conflicts. I have reviewed the SFI form, and in consultation with the submitter, have determined that actual or apparent financial conflicts of interest exist that may directly and significantly affect the design, conduct, or reporting of publicly funded research. This matter has been referred to the applicable financial conflicts team for final review and management.

By signing below, I certify that I have read and understood Addgene's Financial Conflicts of Interest Policy.

Reviewer Signature: _____

Date: _____

Director Signature: _____

Date: _____

Comments:

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GUIDELINES

1. What constitutes a “Significant Financial Interest”?

- A significant financial interest consisting of one or more of the following interests of the Addgene employee (and those of the Addgene employee’s spouse and dependent children) that reasonably appears to be related to the Addgene employee’s responsibilities:
 - With regard to any publicly traded entity, any income received from the entity in 12 months preceding disclosure and value of any equity interests in entity as of date of disclosure exceeding \$5,000 when aggregated for an Addgene employee, Addgene employee’s spouse, and dependent children from a single Entity (Business, Public or Nonprofit) including salary, consultant payments, honoraria, royalty payments, dividend, loan, or any other payments or consideration with value during the prior 12 months. Equity interest includes any stock, stock option, or other ownership interest, as determined through reference to public prices or other reasonable measures of fair market value,
 - With regard to any non-publicly traded entity, any remuneration received from the entity in 12 months preceding disclosure, when aggregated, exceeds \$5,000; or when the Addgene employee holds any equity interest (e.g., stock, stock option, or other ownership interest). Excludes income from seminars, lectures, or teaching engagements sponsored by a Federal, state, or local government agency, an institution of higher education as defined at 20 U.S.C. 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education,
 - Intellectual property interest held by the Addgene employee, or Addgene employee’s spouse or dependent children on a patent, patent application, or a copyright of software assigned or to be assigned to a party other than Addgene upon receipt of income related to such rights and interests that exceed \$5,000 in 12 months preceding disclosure, or
 - Any reimbursed or sponsored travel (i.e., that which is paid on behalf of the Addgene employee and not reimbursed to the employee so that the exact monetary value may not be readily available), related to Addgene responsibilities. Excludes travel reimbursed or sponsored by Federal, state, or local government agency, an Institution of higher education as defined by 20 U.S.C. 1001(A), an academic teaching hospital, a medical center, or a research institute affiliated with an institution of higher education.

2. What is not a “Significant Financial Interest”?

- payments made by Addgene (salary, royalties, honoraria, expense reimbursement or any other remuneration),
- income from seminars, lectures, or teaching engagements sponsored by a federal, state, or local government agency, an institution of higher education as defined at 20 U.S.C. § 1001(a), an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education, and
- an investment by a mutual fund, pension fund or other investment fund over which the Addgene employee or their immediate family member does not exercise management of fund investment

3. When does a potential conflict arise? What should I be considering?

- You are determining whether the *significant* financial interest (SFI) could impact the funded research, or if the third party entity is one whose financial interests could be affected by the research); and
- You are checking if the interest constitutes a financial conflict of interest (e.g., the financial interest may directly and significantly affect the design, conduct or reporting of Addgene and federally-funded research)
- Note: a “financial interest” can be anything of monetary value, whether or not the value is readily ascertainable
- Examples:
 - Entity is a collaborator on or provider of materials, products, data or trainee support for the PHS-funded research or is a licensee with improvement rights to technology likely to arise out of the PHS-funded research.
 - Investigator or Entity has financial interests that could reasonably be considered to have a potential influence on the design, conduct or reporting of the PHS funded research
 - Entity has a reasonable possibility of being financially affected by the PHS funded research
 - Entity sponsors research at Addgene in which the Investigator is directly involved
 - Entity makes gifts to Addgene that benefit Investigator’s research / scholarship (including equipment, gifts or loans)
 - Entity sponsors or makes a product that is under study in research in which Investigator is involved

- Entity sponsors or makes a product that is under study in human subjects in which Investigator is directly or indirectly involved
- Entity licenses Addgene intellectual property in which Investigator has a financial interest
- Entity owns intellectual property, materials, or data that may be used in research at Addgene
- Entity has a Materials Transfer Agreement or Data Transfer and Use Agreement to provide materials or data used in Investigator's research or for materials provided by Investigator to the company/organization
- Entity is the sole-source provider of materials or services or of procurements required for the Investigator to carry out research
- Entity provides financial support for the faculty member's trainees (including graduate students and postdoctoral fellows)

4. What additional information should I get from the submitter if there's a potential FCOI?

- Review the submitted disclosure for the applicable organization; get any payments' dates, amounts and reasons
- If a potential FCOI is tied to equity, get the related stock information and the current monetary value
- If an Addgene's travel has been sponsored or reimbursed, get the purpose of the trip, the identity of the sponsor/organizer, the destination, and the duration