

Anti-Bribery and Anti-Corruption Policy

Nested Knowledge will not tolerate bribery and corruption.

I. Scope

This policy applies to Nested Knowledge employees, sub-contractors, and business partners.

Customer Personal and Financial Interests

Nested Knowledge delivers software services to companies engaged in biomedical research, which may include pharmaceutical companies, contract research organizations, academic institutions, and non-profit organizations.

The research conducted by our customers may influence the following:

- payer reimbursement for drugs, devices, and digital therapeutics.
- regulatory approval of drugs and devices by the FDA
- regulatory approval of drugs and devices by governing bodies outside of the United States.
- bids awarded to contract research organizations
- publication success in medical journals
- grants awarded to research investigators

II. Anti-Corruption Policy

Research in the software is conducted by our customers. Nested Knowledge staff provide training to customers, such as teaching customers how to adopt our technology for their active research projects. In such roles, Nested Knowledge has a duty to avoid influencing the research integrity, data, and outcomes, and to protect the confidentiality of the research projects underway.

> Manipulating Data

If a customer explicitly grants a Nested Knowledge staff member access to their nests, there is a risk the staff may manipulate collected data for their personal or financial gain. This includes changing the value of a data points and excluding studies. Such behavior will result in instant termination, and if applicable, legal action will be initiated.

> Violating Confidentiality and Gathering Intelligence

A Nested Knowledge staff member may maliciously obtain access to user-log data or user research projects, i.e. "nests". In doing so, the staff member could view protocols, view early research results, download user-uploaded documents, and view membership of an organization.

All Nested Knowledge staff sign Non-Disclosure Agreements; violation of NDAs will result in disciplinary action.

> **Compromising Research Integrity**

Nested Knowledge prohibits staff from advising customers on collecting data in a misleading or biased manner, such as:

- manipulate the search strategy to exclude particular articles
- obtain access to the collected data and modify values.
- encourage a biased sample selection
- encourage a biased selection of endpoints

III. Policy Enforcement and Review

These policies will be updated on an annual basis. The next update will be done by Spring 2024. Employees will be required to review the policy annually.

These policies will be distributed to all Nested Knowledge employees and contractors. Staff members found in policy violation may be subject to disciplinary action, up to and including termination.

Revision History

Author	Date of Revision/Review	Comments
K. Cowie	03/21/2023	Initial draft completed

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