

# Anti-Bribery and Ethical Misconduct Policy

## I. Scope

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

## II. Anti-Bribery Policy

**Risk of receiving bribes:** Health Care Professionals (HCPs) may benefit financially from research demonstrating favorable outcomes for drugs, devices, or other interventions, in which the HCP has financial stakes.

Government officials may have stakes in the results of research studies. For example, literature reviews may influence government agency funding, the commercial success of a drug entering market, and drafting of new legislation.

**Risk of offering bribery:** Additionally, obtaining government contracts may financially benefit software companies, such as Nested Knowledge and the employees within. As such, we strictly prohibit bribery to officials and require all employees to disclose their conflicts of interests, including family members and friends in government agencies.

## III. Ethical Misconduct Policy

Employees who suspect ethical misconduct may report it anonymously through a form. The reports will be receipted by at least three Nested Knowledge staff members.

A report of misconduct, via any mode of communication, will launch an investigation into the affected individuals. We retain the right to audit activity in the software, through [activity logs](#). We also may investigate emails and launch a financial audit.



Report ethical misconduct in the anonymous [report form](#).

## Policy Enforcement and Review

This policy will be updated on an annual basis. This policy will be distributed to all Nested Knowledge employees and contractors, who must review the policy annually. 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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