

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 other interventions.
- 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

Risk of Corruption: 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 staff may learn of customer research, gain access to projects, and influence the research direction.

Nested Knowledge has a duty to prevent staff from modifying data, to avoid harming the research integrity, and to protect the confidentiality of the research projects underway. We examine these risks below:

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 research projects “nests” or user log data. 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 and received training on [Data Protection](#) and GDPR compliance. Violation of NDAs or security policies 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 encouraging customers to:

- manipulate the search strategy to exclude particular articles
- create overly-selective exclusion criteria
- recommend a meta-analysis of inappropriate study types
- skip the selection of certain endpoints
- compare certain therapies, leaving other comparators that would be appropriate.
- convey numerical difference as statistical difference
- select subgroups inappropriately

III. 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	Drafted
K. Kallmes	03/21/2023	Approved

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