

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. They also may benefit from receiving authorship on publications.

Code of Conduct

All Nested Knowledge staff are prohibited from offering or accepting bribes. Receiving or offering bribes will result in termination, and may result in legal action. Bribes are not limited to cash offerings. We require executives to disclose their conflicts of interests, including family members in government agencies or healthcare organizations.

III. Ethical Misconduct Policy

Employees who suspect ethical misconduct may report it through an anonymous form. The reports will be received by 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 [anonymousreport 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	Drafted
K. Kallmes	03/21/2023	Approved

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