



# CIRCULAR PLANET INSTITUTE LLC

www.circularplanetinstitute.com

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## Financial Conflict of Interest (FCOI) Policy

### 1. Purpose

The purpose of this Financial Conflict of Interest (FCOI) Policy is to promote objectivity in research by establishing standards that ensure that the design, conduct, and reporting of research funded by the U.S. Public Health Service (PHS), including the National Institutes of Health (NIH), are free from bias resulting from financial conflicts of interest.

This policy is established in accordance with **42 CFR Part 50, Subpart F – Promoting Objectivity in Research**.

### 2. Applicability

This policy applies to **all Investigators** at Circular Planet Institute (CPI) who are responsible for the design, conduct, or reporting of PHS-funded research, including but not limited to:

- Principal Investigators
- Senior/key personnel
- Any individual who materially contributes to PHS-funded research

### 3. Definitions

#### Investigator

An Investigator is any individual, regardless of title or position, who is responsible for the design, conduct, or reporting of PHS-funded research.

#### Significant Financial Interest (SFI)

A Significant Financial Interest is a financial interest that reasonably appears to be related to the Investigator's institutional responsibilities and includes:

- Remuneration from a publicly traded entity in excess of **\$5,000** in the preceding 12 months
- Equity interests in a publicly traded entity exceeding **\$5,000**
- Any equity interest in a non-publicly traded entity
- Intellectual property rights and interests (e.g., patents, royalties)
- Excluded from SFI:
  - Salary or royalties paid by CPI
  - Income from government agencies, academic institutions, or nonprofit research institutes

## 4. Disclosure of Financial Interests

Each Investigator must disclose all Significant Financial Interests:

- **At the time of proposal submission**
- **Annually**
- **Within 30 days** of discovering or acquiring a new SFI

Disclosures must be made in writing to CPI's designated institutional official.

## 5. Review of Disclosures

The CPI Institutional Official is responsible for:

- Reviewing all disclosed SFIs
- Determining whether an SFI is related to PHS-funded research
- Determining whether a Financial Conflict of Interest (FCOI) exists

## 6. Management of Financial Conflicts of Interest

If an FCOI is identified, CPI will develop and implement a **management plan**, which may include:

- Public disclosure of the conflict
- Modification of the research plan
- Monitoring of the research by independent reviewers
- Recusal from conflicted activities
- Divestiture of financial interests, if required

All management plans will be documented and enforced.

## 7. Reporting to NIH

CPI will report identified FCOIs to NIH:

- **Prior to the expenditure of funds**
- **Within 60 days** of identifying a new FCOI
- Annually, as required

CPI will also provide retrospective reviews and mitigation reports when applicable.

## 8. Investigator Training

Each Investigator must complete FCOI training:

- Prior to engaging in PHS-funded research
- At least **every four years**
- Immediately if this policy is revised or noncompliance occurs

Training may be satisfied using NIH-approved training materials.

## 9. Enforcement and Sanctions

Failure to comply with this policy may result in disciplinary action, including but not limited to:

- Suspension of research activities
- Removal from the project
- Other corrective actions deemed appropriate by CPI

## **10. Record Retention**

CPI will retain FCOI records for at least **three years** following submission of the final expenditure report or as otherwise required by applicable regulations.

## **11. Public Accessibility**

In accordance with NIH requirements, this Financial Conflict of Interest Policy is publicly accessible on the Circular Planet Institute website.

### **Approved by:**

Circular Planet Institute  
Isaac Mpanga, Founder  
May 8, 2026