



Conflict of Interest Policy

I. Purpose

Target ALS was founded to foster collaboration between academic and for-profit laboratories with the goal of stimulating successful drug development programs. With the involvement of multiple institutions and laboratories whose scientific and other interests may overlap, those affiliated with or funded by Target ALS may be expected to have conflicts of interest (COI) of several types and at different levels of organization. As a matter of scientific and fiduciary responsibility to our donors and to ALS patients and their families, it is important that Target ALS identify and manage any COI that may arise. The aim of our policy is to ensure that board members, advisors, employees, investigators, and external reviewers act impartially and confidentially where appropriate, and in a manner consistent with the aims of Target ALS. The institutions with which Target ALS investigators and reviewers are associated also have COI policies to which their staff and faculty must adhere. The COI policy of Target ALS is meant to complement and not to replace the COI policies of these institutions.

II. Defining Conflicts of Interest

Conflicts of interest can be of two types:

1. A personal conflict involving financial gain or interest.
2. A professional scientific conflict involving issues of institutional or third-party affiliation and overlapping scientific interests.

An apparent, potential or actual conflict of interest may arise if a board member, advisor, employee or external reviewer or an immediate family member:

1. Has an apparent, potential or actual financial or other interest that could cause an independent observer to question whether a decision on a grant, contract or other award made by Target ALS had been influenced by personal, business or familial financial gain.

Examples:

A member of the Independent Review Committee (IRC), Board of Directors, an advisor, or an employee may influence the grant review process to benefit their company or university.

An employee may hire or contract with a company in which they or a family member may have a financial interest.

2. Has a scientific or professional conflict of interest that could directly affect a decision on a grant or contract, or other award made by Target ALS or that results in a violation of confidentiality.

Examples:

A member of the IRC, Board of Directors, an advisor, or an employee may influence the grant review process to benefit their own scientific program or that of a collaborator or former student.

A member of the IRC, Board of Directors, an advisor, or an employee may convey confidential or proprietary information from an application to other scientists, giving them an unfair competitive advantage.

For the purposes of the grant application reviews, as detailed in the Target ALS Grant Application Review Policy, Conflict of Interest is defined more narrowly for members of the IRC and advisors participating in grant application reviews. In line with NIH Policy for external reviewers, a conflict of interest occurs when:

- The Principal Investigator (PI) or others on the application with a major role are from the reviewer's institution or institutional component (e.g., department).
- Within the past three years, the reviewer has been a collaborator, been involved in the preparation of a grant application or contract proposal, or has had any other professional relationship (e.g., served as a mentor), with any person on the application who has a major role.
- The application includes a letter of support or reference letter from the reviewer.
- The reviewer serves as a member of the advisory board for the project under review.
- The reviewer has a direct or an indirect financial interest from the applicant institution or PI of over \$10,000 in honoraria, stocks, and fees during the course of the last year or during the project period.

III. Disclosing Conflicts of Interest

Based on the criteria outlined above, all members of the IRC, Board of Directors, advisors, and employees must agree to abide by this policy and disclose any conflicts of interest they may have. This includes identifying biomedical companies in which they have a financial interest. Such financial interest can include, but is not limited to, the following examples:

- Any company with which they have a relationship as a consultant, board member, advisor, or an employee.

- Any publicly-traded company in which they hold directly more than \$10,000 in stock.
- Any non-publicly traded company in which they hold any amount of stock.

Members of the IRC and any advisors who participate in the review of grant applications will disclose their conflicts of interest every time they are asked to participate in reviewing grant applications, based specifically on the investigators and institutions in the pool of applicants.

Members of the Board of Directors, advisors, and employees will submit an annual conflict of interest disclosure form. This form includes an attestation that they have not participated in any decisions in which they have a conflict of interest in the prior year.

IV. Conflict of Interest Committee

The COI Committee, which reports to the Board of Directors, is charged with formulating the COI policy for Target ALS and for overseeing its implementation. The Chair of the COI Committee is appointed by the Board Chair from among Board members. The COI Committee will make an annual report to the Board concerning COI issues.

Identification and management of COI issues is vital to the success of Target ALS. Anyone associated with Target ALS who has concerns about conflicts of interest or about the COI Policy should direct them to the COI Committee, which will investigate them and recommend remedies, if appropriate.

The Chair of the IRC will make an annual report on the implementation of the Grant Application Review Policy to the COI Committee, including any conflicts that have arisen during the year.

The COI Committee welcomes any questions or suggestions regarding the terms and application of the COI policy.

Attestation

I have reviewed the Target ALS Conflict of Interest Policy and will abide by its disclosure requirements.

Signature

Name:

Date: