



## 2022 Financial Conflict of Interest (FCOI) Disclosure Form

Name of person completing the form: \_\_\_\_\_

Title: \_\_\_\_\_

Mailing Address: \_\_\_\_\_

Email address: \_\_\_\_\_

Phone: \_\_\_\_\_

A “**Significant Financial Interest**” (SFI) is defined as receipt of a foreign or domestic financial interest by you, your spouse or partner, or your dependent child(ren), which reasonably appears to be related to your professional responsibilities at Adecto Pharmaceuticals, Inc. (**Adecto**), consisting of one or more of the following:

- Income that exceeds \$5,000 from any outside entity received within the previous 12 months.
- Acquisition of equity in a publicly-traded entity that exceeds \$5,000 in value.
- Aggregated income and equity interest from a publicly-traded entity that exceeds \$5,000, as measured on a rolling 12-month basis.
- Any equity interest in a non-publicly traded entity.
- Income from intellectual property rights in excess of \$5,000 over the previous 12 months.
- Reimbursed or sponsored travel, income from seminars, lectures, or teaching engagements, and income from service on advisory committees or review panels, exceeding \$5,000 per entity, as measured on a rolling 12-month basis (see below for U.S.-based exclusions).
- Financial interests received from any foreign entity, including foreign institutions of higher education, academic teaching hospitals, or medical centers, and foreign governments (which includes local, provincial, or equivalent governments of another country) when each such interest exceeds \$5,000 in the previous twelve months.
- Any negotiations, plans to participate or participation in a Foreign Talent Program. A “**Foreign Talent Program**” is defined as any program sponsored by, or benefit offered (whether in the form of remuneration or in-kind support) by a foreign researcher, foreign government (at any level), foreign entity, or foreign government-controlled entity for the purpose of facilitating the transfer or acquisition of expertise, technical know-how, research results/data/designs, or technology.

Excluded from this definition of SFI are:

- Salary, royalties, travel or other remuneration paid to you by Adecto, if you are currently employed or otherwise appointed by Adecto.
- Intellectual property rights assigned to Adecto and agreements to share in royalties related to such rights.
- Any ownership interest in Adecto.
- Income from investment vehicles, such as mutual funds and retirement accounts, as long as you do not directly control the investment decisions made in these vehicles.
- Reimbursed or sponsored travel, income from seminars, lectures, or teaching engagements, and income from service on advisory committees or review panels from a U.S. federal, state, or local government agency, a U.S. institution of higher education as defined at 20 U.S.C. 1001(a), a U.S. academic teaching hospital, a U.S. medical center, or a research institute that is affiliated with a U.S. Institution of higher education.

**Do you have any SFI related to your professional responsibilities at Adecto?**

Yes, I have a SFI to report. (Please provide information about your SFI below)

No, I have no SFI to report.

By submitting this form, you confirm that you have read and will abide by Adecto's FCOI Policy. You understand your obligation to disclose any change(s) within 30 days of acquiring a new or increased SFI that may arise after submission of this form.

**Signature:** \_\_\_\_\_

**Date:** \_\_\_\_\_

**The information provided below will be treated as Confidential.**

<b>Interest/Activity Type</b>	<b>Entity Name</b>	<b>Interest/ compensation/ reimbursement amount</b>	<b>Describe interest/activity (person holding interest, work performed...)</b>
Equity/Ownership (stock, stock options...)			
Remuneration (consulting fees, speaker's bureau, honoraria...)			
Associations, Memberships, Positions (board of directors, offices...)			
Intellectual Property rights/ Royalty Income			
Travel			Destination/Duration/Purpose:

**Additional Comments:**