

TISSUE TESTING TECHNOLOGIES LLC (T3LLC)

Financial Conflict of Interest Related to Research Policy

Effective Date: June 13, 2020

1.0 Purpose and Background

T3LLC has formulated a Financial Conflict of Interest Related to Research Policy (FCOI) to identify and address real and apparent financial conflicts of interest in research with the goal of preventing personal interests and activities from adversely influencing research operations. This policy is intended to increase awareness of research personnel to the potential for conflicts of interest and to establish procedures whereby such conflicts may be avoided or properly managed. Principles and procedures, outlined in this policy, assure that research personnel will report external commitments and financial interests in a timely manner and real and apparent conflicts will be identified and responsibly managed. Conflicts of interest, therefore, may arise from ordinary and appropriate activities as a part of assigned employment duties so the existence of a conflict should not imply wrongdoing. When conflicts of interest do arise, however, they must be recognized and disclosed, then eliminated or appropriately managed.

2.0 Applicability

This policy applies to all T3LLC research personnel. This includes all full-time, part-time, regular FTE, temporary, and contract research personnel and others acting on behalf of the Company in the performance of Company-related research.

3.0 Government Rules and Regulations

This policy promotes compliance with all applicable federal and state laws, regulations, and policies regarding conflicts of interest. Nothing in this policy shall be construed to permit, even with disclosure, any activity that is prohibited by law.

Public Health Service (PHS)/National Institutes of Health (NIH) Funded Research: Company research personnel who seek to conduct federally-funded research (including PHS/NIH funding) or are funded by a federal agency are subject to the federal policy governing that agency's FCOI policy in addition to the Company Financial Conflict of Interest (FCOI) Related to Research Policy. Any conflict of interest subject to the Financial Conflict of Interest Related to Research Policy shall be reviewed and managed pursuant to the requirements of the applicable federal agency's policy.

Uniform Administrative Requirements, Cost Principles and Audit Requirements for Federal Awards: This policy is intended to comply with the requirements of 2 CFR 200.318 as applicable to T3LLC.

Conflicts of Interest in Human Subjects Research: Conflicts of interest related to research involving human subjects pose special concerns. The Company and its researchers have ethical obligations to honor the rights and protect the safety of persons who participate in research. Financial interests held by those conducting the research may compromise the fulfillment of those ethical obligations and the well-being of the research subjects, as well as the integrity of the related research. Accordingly, any person with an unmanaged COI is prohibited from participating in the conduct of such research. In addition, research involving human subjects where there is a financial

conflict of interest may only go forward if the design and circumstances of the human subjects research are such that they serve to protect both the human subjects and the objectivity of the data obtained.

4.0 Principles

Objectivity and integrity in decision-making: T3LLC's research personnel are obligated to make decisions that are in the best interest of the institution, free from any conflict that might place personal interests ahead of the public interest.

Transparency in relationships with external communities: Activities with outside enterprises and other economic activities of the Company should be conducted so as to maintain public confidence in the Company as an institution committed to the pursuit of truth and advancement of knowledge.

Commitment to oversight and management: The Company's leadership and administration must be aware of and deal appropriately with potential conflict of interest situations, both real and perceived, which may arise in connection with outside professional activities. All T3LLC personnel are obligated to disclose any interests that may be determined to be potential conflicts and the Company is then responsible for providing a conflict of interest management process that protects the interests of our personnel, the Company and the public.

5.0 Policy

All personnel are required to disclose upon hiring, as the situation arises, and at least on an annual basis, professional and relevant personal activities and relationships that create a conflict of interest or that have the appearance of creating a conflict of interest. For all positive disclosures, a plan to manage, mitigate or eliminate the conflict will be developed and approved.

6.0 Responsibilities

The Chief Executive Officer is responsible for overseeing the implementation of this Policy. Day-to-day responsibility for such implementation is delegated through the Vice President, Research Operations, to manage policy issues and maintain relevant records.

Disclosure

All personnel are required to complete conflict of interest disclosure as a new T3LLC employee and as part of the required annual disclosure process.

Reporting Suspected Conflicts of Others

Members of the Company who become aware of any undocumented conflict of interest subject to this policy, not just their own, should report it to the Chief Executive Officer or Vice President, Research Operations.

Conflict of Interest Committee

The Chief Executive Officer, an independent (outside) Human Resources Consultant, and the Vice

President, Research Operations, constitute the Company Conflict of Interest Committee (COIC). The COIC serves as the appeals body for conflict of interest situations that are not able to be resolved.

7.0 Sanctions for Non-Compliance

Research personnel who violate this policy are subject to disciplinary action, up to and including termination.

8.0 Approval Signatures

This policy has been approved by:

A handwritten signature in black ink that reads "Kelvin G. M. Brockbank". The signature is written in a cursive, flowing style.

Kelvin G. M. Brockbank, Chief Executive Officer
Tissue Testing Technologies LLC

Revision: February 1st, 2021