Longevity Metrics, Inc. Financial Conflict of Interest Policy for PHS-Funded Research

1. Purpose and scope

Longevity Metrics, Inc. ("Longevity Metrics") adopts this policy to comply with 42 CFR Part 50, Subpart F, Promoting Objectivity in Research (the "FCOI regulation"). Its purpose is to provide a reasonable expectation that the design, conduct, and reporting of research funded by the Public Health Service (PHS) will be free from bias resulting from Investigator financial conflicts of interest.

This policy applies to every Investigator who is planning to participate in, or is participating in, research for which Longevity Metrics seeks or receives PHS funding through a grant or cooperative agreement, including funding from the National Institutes of Health (NIH). Where the FCOI regulation imposes a requirement this policy does not address, the regulation applies. Where this policy is stricter than the regulation, this policy applies.

2. Definitions

Terms in this policy have the meanings given in 42 CFR 50.603. The key terms are summarized below.

- **Investigator:** the principal investigator and any other person, regardless of title or position, who is responsible for the design, conduct, or reporting of PHS-funded research or research proposed for PHS funding. This may include collaborators and consultants.
- **Institutional responsibilities:** an Investigator's professional responsibilities on behalf of Longevity Metrics, including research, research consultation, clinical and professional practice, teaching, and service on Longevity Metrics committees, including the Longevity Metrics IRB.
- **Significant financial interest (SFI):** a financial interest of the Investigator, or of the Investigator's spouse and dependent children, that reasonably appears to be related to the Investigator's institutional responsibilities, consisting of:
    - for a publicly traded entity, remuneration received in the prior 12 months plus equity held on the date of disclosure that together exceed $5,000;
    - for a non-publicly traded entity, remuneration received in the prior 12 months that exceeds $5,000, or any equity interest of any value;
    - intellectual property rights and interests, upon receipt of income related to them.
- **SFI exclusions:** an SFI does not include salary, royalties, or other remuneration paid by Longevity Metrics to an Investigator it employs or appoints, including intellectual property rights assigned to Longevity Metrics; any ownership interest in Longevity Metrics, because it is a for-profit organization; income from investment vehicles such as mutual funds and retirement accounts that the Investigator does not directly control; and income from seminars, lectures, teaching, advisory committees, or review panels for a government agency, an institution of higher education, an academic teaching hospital, a medical center, or a research institute affiliated with an institution of higher education.
- **Financial conflict of interest (FCOI):** an SFI that could directly and significantly affect the design, conduct, or reporting of PHS-funded research.

- **Manage:** taking action to address an FCOI, including reducing or eliminating it, to ensure, to the extent possible, that the research will be free from bias.
- **Designated Official:** the person named in Section 3 to carry out this policy for Longevity Metrics.

Source: 42 CFR 50.603.

3. Designated Official

The Designated Official is Brittany Bonser, Chair of the Longevity Metrics IRB. The Designated Official may not hold an ownership interest in Longevity Metrics and may not review their own disclosures. If the Designated Official has a financial or personal interest in a disclosure, another Longevity Metrics IRB member with no ownership interest in Longevity Metrics reviews it.

The Designated Official solicits and reviews SFI disclosures, determines whether an SFI is related to PHS-funded research and whether it is an FCOI, approves and monitors management plans, and prepares FCOI reports. The Chief Executive Officer, as Signing Official, submits FCOI reports to NIH and this policy to the eRA Commons Institution Profile. If the Designated Official changes, Longevity Metrics will update this section.

4. Training

Each Investigator will be informed of this policy, of the Investigator's disclosure responsibilities, and of the FCOI regulation. Each Investigator must complete FCOI training before engaging in PHS-funded research and at least every four years. Training is also required immediately when:

- Longevity Metrics revises this policy in a way that affects Investigator requirements;
- an Investigator is new to Longevity Metrics; or
- Longevity Metrics finds that an Investigator is not in compliance with this policy or a management plan.

The NIH FCOI online tutorial satisfies this requirement. The Designated Official keeps a record of each completion date.

Source: 42 CFR 50.604(b).

5. Disclosure

Each Investigator discloses SFIs, including those of the Investigator's spouse and dependent children, to the Designated Official on the form in Appendix A:

1. no later than the date Longevity Metrics submits an application for PHS-funded research, or, for an Investigator who joins an ongoing project, before beginning work on it;
2. at least annually during the award, by the anniversary of the award start date, including any new information and any changes to SFIs previously disclosed; and
3. within 30 days of discovering or acquiring a new SFI, for example through purchase, marriage, or inheritance.

Travel. Each Investigator discloses any reimbursed or sponsored travel related to their institutional responsibilities with the initial disclosure and each annual update, stating the purpose, the sponsor or

organizer, the destination, and the duration. Travel paid by a federal, state, or local government agency, an institution of higher education, an academic teaching hospital, a medical center, or a research institute affiliated with an institution of higher education need not be disclosed. The Designated Official decides whether more information, including monetary value, is needed to determine whether the travel is an FCOI.

Source: 42 CFR 50.603 and 50.604(e).

6. Review and management

Before Longevity Metrics spends any PHS funds, the Designated Official reviews each disclosure and determines whether each SFI is related to the PHS-funded research and, if so, whether it is an FCOI.

- **Related:** an SFI is related to PHS-funded research when it could be affected by the research, or is in an entity whose financial interest could be affected by the research. The Investigator may be asked to help with this determination.
- **FCOI:** a related SFI is an FCOI when it could directly and significantly affect the design, conduct, or reporting of the research.

For each FCOI, the Designated Official sets a written management plan that the Investigator signs. Conditions may include public disclosure of the FCOI, disclosure to research participants, an independent monitor, changes to the research plan, changes to or removal of personnel from the research, reduction or elimination of the financial interest, or ending the relationship that creates the conflict.

When a new Investigator joins an ongoing project, or an Investigator discloses a new SFI, the Designated Official completes the review within 60 days of the disclosure and puts at least an interim management plan in place for any FCOI. The Designated Official monitors compliance with each management plan until the project ends.

Source: 42 CFR 50.604(f)-(g) and 50.605(a).

7. Reporting to NIH

Longevity Metrics reports FCOIs to the PHS awarding component through the eRA Commons FCOI module:

1. **Initial report:** before spending any funds under a new award, for each FCOI, confirming that a management plan is in place. No report is needed if the FCOI is eliminated before funds are spent.
2. **New FCOI:** within 60 days of identifying an FCOI during an ongoing project.
3. **Annual report:** for each reported FCOI, every year for the project period and any extension, stating whether the FCOI is still being managed or why it no longer exists, and any changes to the management plan.

Each report includes the project number, the PD/PI, the Investigator, the entity, the nature and approximate value of the interest, how the interest relates to the research and why it was found to be an FCOI, and the key elements of the management plan.

Source: 42 CFR 50.605(b).

8. Public access

This policy is posted at longevitymetrics.org, linked from the footer of every page. Longevity Metrics also submits it to NIH through the eRA Commons Institution Profile.

Before spending PHS funds, Longevity Metrics makes information available, by written response within five business days of a request, about any SFI that is still held by senior/key personnel, that is related to the PHS-funded research, and that Longevity Metrics has determined is an FCOI. The response gives the Investigator's name, title, and role in the research; the name of the entity; the nature of the interest; and its approximate dollar value in these ranges: $0 to $4,999; $5,000 to $9,999; $10,000 to $19,999; $20,000 to $100,000 in $20,000 increments; or above $100,000 in $50,000 increments, or a statement that the value cannot be readily determined. Each response states that the information is current as of the date of the response and is subject to updates. The information stays available for at least three years after its most recent update.

Source: 42 CFR 50.604(a) and 50.605(a)(5).

9. Noncompliance and enforcement

If an SFI was not disclosed on time, was not reviewed, or an FCOI was not managed, the Designated Official reviews it within 60 days of identifying it and puts in place at least an interim management plan for any FCOI. If an FCOI was not identified or managed in time, the Designated Official completes, within 120 days of determining the noncompliance, a retrospective review of whether the research was biased during the period of noncompliance. The review records the project number and title, the PD/PI, the Investigator, the entity, the reasons for the review, the methods, the findings, and the conclusions.

Longevity Metrics updates the FCOI report. If bias is found, it promptly notifies the PHS awarding component and submits a mitigation report describing the effect of the bias and the corrective actions.

Investigators who do not comply with this policy or a management plan may face sanctions up to and including removal from the research or termination of their employment or contract. Longevity Metrics will comply with any HHS enforcement action under 42 CFR 50.606.

Source: 42 CFR 50.604(j) and 50.605(a)(3).

10. Subrecipients and consultants

When PHS-funded research is carried out through a subrecipient, a written agreement states whether this policy or the subrecipient's FCOI policy applies to the subrecipient's Investigators. If the subrecipient's policy applies, the subrecipient certifies that its policy complies with the FCOI regulation; if it cannot, this policy applies. The agreement sets deadlines for the subrecipient to report SFIs or FCOIs early enough for Longevity Metrics to review them and report to NIH on time.

Consultants and collaborators who meet the definition of Investigator and who are not covered by a subrecipient agreement follow this policy.

Source: 42 CFR 50.604(c).

11. Records, approval, and effective date

Longevity Metrics keeps all disclosures, the Designated Official's reviews and determinations, management plans, training records, and retrospective reviews for at least three years after the final expenditure report for the award is submitted to PHS, or longer where 2 CFR 200.334 requires.

This policy was approved by William Brandenburg, MD, Chief Executive Officer, and takes effect on November 26, 2026. It will be updated whenever the FCOI regulation changes.

Source: 42 CFR 50.604(i).

Appendix A. Significant Financial Interest Disclosure Form

Submit to the Designated Official. Include interests of your spouse and dependent children. Do not list excluded interests (Section 2), including your salary from or ownership of Longevity Metrics.

Investigator: ____ **Role on project:** ____ **Project title or application:** ____

Reason for disclosure: [ ] Application [ ] Joining a project [ ] Annual update [ ] New SFI (within 30 days)

[ ] I have no significant financial interests to disclose.

Entity	Interest type (remuneration, equity, IP income)	Approximate value	Held by (self, spouse, child)	Related to my institutional responsibilities?

Reimbursed or sponsored travel

Sponsor or organizer	Purpose	Destination	Dates and duration

FCOI training last completed on: ____

I certify that this disclosure is complete and accurate, and that I will update it within 30 days of any new SFI.

Signature: ____ Date: ____

For the Designated Official: [ ] No SFI [ ] SFI not related [ ] SFI related, not an FCOI [ ] FCOI, management plan attached

Reviewed by: ____ Date: ____