

1 January 2025

Radiasoftware LLC Financial Conflict of Interest (COI) Policy

Radiasoftware LLC is committed to maintaining the highest standards of integrity and transparency in all research activities funded by the Department of Energy (DOE), the Department of Defense (DOD) and for all other federal, academic and private customers.

Definitions:

- Financial conflict of interest (COI) means a situation in which an Investigator or the Investigator's spouse or dependent children has a significant financial interest or financial relationship that could directly and significantly affect the design, conduct, reporting, or funding of a project.
- Significant financial interest means:
 - (1) A financial interest consisting of one or more of the following interests of the Investigator (and those of the Investigator's spouse and dependent children) that reasonably appears to be related to the Investigator's responsibilities:
 - (i) With regard to any foreign or domestic publicly traded entity, a significant financial interest exists if the value of any remuneration received from the entity in the twelve months preceding the disclosure and the value of any equity interest in the entity as of the date of disclosure, when aggregated, exceeds \$5,000. Remuneration includes salary and any payment for services (e.g., consulting fees, honoraria, paid authorship); equity interest includes stock, stock options, or other ownership interest;
 - (ii) With regard to any foreign or domestic non-publicly traded entity, a significant financial interest exists if the value of any remuneration received from the entity in the twelve months preceding the disclosure, when aggregated, exceeds \$5,000, or when the Investigator (or Investigator's spouse or dependent children) holds any equity interest;
 - (iii) Intellectual property rights and interests (e.g., patents, copyrights), upon receipt of income related to such rights and interests.
 - (2) Investigators must also disclose reimbursed or sponsored travel related to their responsibilities, excluding travel sponsored by federal, state, or local government agencies, institutions of higher education, or affiliated research institutes.
- Investigator means the principal investigator (PI) and any other person, regardless of title or position, responsible for the purpose, design, conduct, or reporting of a project funded or proposed for funding by DOE.

In compliance with the DOE Interim Conflict of Interest (COI) Policy, RadiaSoft shall:

1. Maintain an up to date, written, and enforced policy on financial conflicts of interest (i.e. this document) that complies fully with the DOE Interim COI Policy, and make this policy publicly accessible via the company website
2. Inform all Investigators of this policy and provide regular training on financial conflicts of interest, their responsibilities regarding disclosure of Significant Financial Interests (SFI). Training will occur at least every four years, or immediately if:
 - The policy or procedures are revised in any manner that affects Investigators,
 - An Investigator is new to RadiaSoft LLC,
 - An Investigator is found non-compliant with this policy.
3. Require all RadiaSoft employees who are responsible for the purpose, design, conduct, or reporting of DOE-funded research projects to disclose their Significant Financial Interests:
 - At the time of application for DOE funding,
 - Annually during the period of the award,
 - Within 30 days of discovering or acquiring a new SFI.
4. RadiaSoft president Jonathan Edelen has been designated to solicit and review disclosures of SFIs from Investigators participating in DOE-funded research projects and to determine if these SFIs constitute a COI.
5. Provide initial and ongoing COI reports to DOE prior to expenditure of DOE funds and within 60 days of subsequently identified COIs.
6. Maintain records relating to all employee disclosures and management actions taken for at least three years from the date of submission of the final expenditures report.
7. Flow down all applicable requirements of this policy to subrecipient non-Federal entities.

Regulatory Authority

This policy implements the requirements of [42 CFR 50 Subpart F and 45 CFR 94](#); where there are substantive differences between this policy and the requirements, the requirements shall take precedence.