Oculogenex

OCULOGENEX, INC.

Financial Conflict of Interest (FCOI) Policy

Version 1.1 • Effective Date: June 2026

1. Introduction

The purpose of this policy is to ensure that research funded by the National Institutes of Health (NIH) and other Public Health Service (PHS) agencies is designed, conducted, and reported objectively and without bias resulting from Investigator financial conflicts of interest (FCOI). This policy implements the regulatory requirements of **42 CFR Part 50 Subpart F** and **45 CFR Part 94**, which set requirements for promoting objectivity in PHS-funded research for grants, cooperative agreements, and research contracts, respectively. Note that these regulations do not apply to Phase I SBIR or STTR applications or awards.

Oculogenex, Inc. (**"Oculogenex"**) adopts this policy for all Investigators (as defined below) engaged in PHS/NIH-funded research. It establishes processes to identify, disclose, and manage Investigator financial conflicts of interest to protect research integrity, ensure the safety of human subjects, and maintain public trust in PHS/NIH-supported research.

Oculogenex recognizes that relationships with commercial entities, intellectual property interests, equity ownership, consulting arrangements, sponsored research, and other financial interests may create actual, potential, or perceived conflicts of interest. Such relationships are not inherently inappropriate; however, they must be identified, reviewed, and managed to ensure the integrity of research and compliance with applicable federal requirements.

Oculogenex requires all Investigators participating in PHS-funded research to disclose Significant Financial Interests related to their Institutional Responsibilities. Oculogenex shall review such disclosures, determine whether Financial Conflicts of Interest exist, implement management plans when necessary, provide required training, conduct retrospective reviews when applicable, and submit required reports to NIH.

2. Scope

This policy applies to all Investigators who are responsible for the design, conduct, or reporting of PHS/NIH-funded research at Oculogenex, including research supported by the National Institutes of Health (NIH). It also applies to Investigators who participate as employees, subcontractors, or collaborators on NIH-funded projects.

3. Definitions

For the purposes of this policy, the following definitions apply:

3.1 Designated Official (DO)

The individual appointed by Oculogenex to solicit and review disclosures of Significant Financial Interests, determine FCOIs in accordance with 42 CFR 50.604(f) and this policy, and develop and oversee management plans for identified FCOIs. The Designated Official for Oculogenex is identified in Section 4.

3.2 Financial Conflict of Interest (FCOI)

A Significant Financial Interest that is related to the PHS/NIH-funded research (i.e., the SFI could be affected by the research, or the SFI is in an entity whose financial interests could be affected by the research) and could directly and significantly affect the design, conduct, or reporting of PHS-funded research.

3.3 Financial Interest

Anything of monetary value, whether or not its value is readily ascertainable.

3.4 Institution

Any public or private organization, domestic or foreign (excluding a federal agency) that is applying for or receives PHS/NIH research funding.

3.5 Institutional Responsibilities

The professional activities an Investigator performs on behalf of Oculogenex, including research, product development and testing, publication and communication of research, clinical development, regulatory activities, consulting, operations management, administration, fundraising, and institutional committee memberships or panels.

3.6 Investigator

The Project Director (PD), Principal Investigator (PI), or any individual, regardless of title or position, who is responsible for the design, conduct, or reporting of research funded or proposed for funding by PHS/NIH. This may include collaborators or consultants. Oculogenex determines who is responsible for the design, conduct, or reporting of PHS-funded research based on an individual's role and level of independence, not their title.

3.7 Manage

Taking action to address a Financial Conflict of Interest, which can include reducing or eliminating the financial conflict of interest, to ensure, to the extent possible, that the design, conduct, and reporting of research will be free from bias.

3.8 NIH

The National Institutes of Health, the biomedical research agency within the Public Health Service (PHS) that funds and conducts research to improve health and advance scientific knowledge.

3.9 PHS

The Public Health Service of the U.S. Department of Health and Human Services, and any components of the PHS to which the authority involved may be delegated, including the National Institutes of Health (NIH).

3.10 PHS-Funded Research

Any activity supported by a Public Health Service (PHS) Awarding Component through a grant, cooperative agreement, or contract, whether funded under the PHS Act or other statutory authority.

3.11 Research

A systematic investigation, study, or experiment designed to develop or contribute to general knowledge relating broadly to public health, including biomedical research. This term includes both basic and applied research (e.g., published articles, books, or book chapters) and product development (e.g., diagnostic devices or analytical instruments).

3.12 Senior/Key Personnel

The PD/PI and any other individual identified as senior/key personnel by Oculogenex in a grant application, progress report, or other submission to PHS/NIH. For this policy, this term applies specifically to the public accessibility requirement, which mandates disclosure of financial conflicts of interest held by these individuals, as described in Section 10.

3.13 Significant Financial Interest (SFI)

A domestic or foreign financial interest of the Investigator, the Investigator's spouse, and dependent children that reasonably appears to relate to the Investigator's Institutional Responsibilities on behalf of Oculogenex, and that consists of one or more of the following:

- **Publicly traded entity:** An SFI exists if the total of remuneration received from the entity in the previous 12 months and the value of any equity interest in the entity on the disclosure date, when aggregated, exceeds $5,000. Remuneration includes salary and payments for services (e.g., consulting fees, honoraria, paid authorship). Equity interest includes stock, stock options, or other ownership interests measured by public prices or other reasonable market value.
- **Non-publicly traded entity:** An SFI exists if the aggregated value of remuneration received from the entity in the 12 months preceding the disclosure exceeds $5,000, or if the Investigator (or their spouse or dependent children) holds any equity interest in the entity (e.g., stock, stock options, or other ownership interest), regardless of value.
- **Intellectual property:** An SFI exists if income related to intellectual property rights or interests (e.g., patents, copyrights) exceeds $5,000 during the 12 months preceding the disclosure.
- **Sponsored or reimbursed travel:** Investigators must disclose any reimbursed or sponsored travel related to their Institutional Responsibilities with a value exceeding $5,000. Such travel includes trips paid on behalf of the Investigator rather than reimbursed directly, where the exact cost may not be known. The disclosure must cover the previous 12 months and include, at minimum, the purpose, sponsor or organizer, destination, and duration of each trip. This disclosure requirement does not apply to travel reimbursed or sponsored by: (a) a federal, state, or local government agency located in the United States; (b) a U.S. institution of higher education; (c) an academic teaching hospital; (d) a medical center; or (e) a research institute affiliated with a U.S. institution of higher education.
- **Foreign financial interests:** Investigators must disclose all financial interests originating outside the United States, including income from seminars, lectures, teaching engagements, service on advisory committees or review panels, and reimbursed or sponsored travel, received from any foreign entity, including foreign institutions of higher education and foreign governments. Disclosure is required when the aggregated amount of such income exceeds $5,000.

The term "Significant Financial Interest" does not include, and Investigators are not required to disclose, the following:

- Salary, royalties, or other remuneration paid by Oculogenex to the Investigator, including intellectual property rights assigned to Oculogenex and any agreements to share royalties related to those rights.
- Any ownership interest in Oculogenex held by the Investigator, given that Oculogenex is a for-profit commercial organization.

- Income from investment vehicles such as mutual funds and retirement accounts, provided the Investigator does not directly control the investment decisions for those vehicles.
- Income from seminars, lectures, or teaching engagements sponsored by a U.S. federal, state, or local government agency, a U.S. institution of higher education, an academic teaching hospital, a medical center, or a research institute affiliated with a U.S. institution of higher education.
- Income from service on advisory committees or review panels for a U.S. federal, state, or local government agency, a U.S. institution of higher education, an academic teaching hospital, a medical center, or a research institute affiliated with a U.S. institution of higher education.

4. Designated Official (DO)

The Designated Financial Conflict of Interest Official for Oculogenex is:

Ramaswamy L. Ramkumar, PhD
Chief Operating Officer
Oculogenex, Inc.

The DO is organizationally independent from the Principal Investigator's research responsibilities and is responsible for:

- Soliciting and reviewing Investigator SFI disclosures.
- Determining whether Significant Financial Interests exist and are related to PHS-funded research.
- Determining whether Significant Financial Interests constitute Financial Conflicts of Interest.
- Developing, communicating, and overseeing FCOI management plans.
- Monitoring Investigator compliance with management plans for the duration of each NIH award.
- Conducting retrospective reviews and preparing mitigation reports when required.
- Designating or serving as the FCOI Signing Official (FCOI SO) in the NIH eRA Commons FCOI Module.
- Submitting required FCOI reports to NIH via the eRA Commons FCOI Module.
- Maintaining records required under this policy and applicable regulations.

The Principal Investigator shall not serve as the DO for his or her own disclosures. Any disclosures submitted by the Chief Executive Officer, Principal Investigator, founder, or equity holder of Oculogenex shall be reviewed and managed by the DO.

5. Significant Financial Interest (SFI) Disclosure Requirements

Investigators are required to disclose Significant Financial Interests (SFIs) at the following times:

- **At the time of application:** The PI and all other individuals who meet the definition of "Investigator" must disclose their SFIs to the DO. Any new Investigator who joins the project after the NIH application has been submitted or during the course of the research

must also disclose their SFI(s) to the DO promptly and before participating in the project, using the SFI Disclosure Form.

- **Annual disclosure:** Each Investigator participating in research under an NIH award must submit an updated SFI disclosure on or before July 1 of each year during the award period. The annual disclosure must include: (1) any new information not previously disclosed, including SFIs associated with NIH-funded projects transferred from another institution; and (2) updated details for any previously disclosed SFI, such as changes in the value of an equity interest.
- **New SFIs during the award:** Each Investigator must submit an updated SFI disclosure within 30 days of discovering or acquiring a new SFI (e.g., through purchase, marriage, or inheritance). Updated disclosure of reimbursed or sponsored travel must also be submitted within 30 days of each occurrence.

Internal Governance Disclosure Requirement: Notwithstanding the standard regulatory exclusion for equity interests in for-profit institutions, Oculogenex voluntarily requires disclosure of founder shares, stock ownership, stock options, warrants, intellectual property interests, licensing interests, and other ownership interests in Oculogenex. These disclosures shall be reviewed and managed under this policy to ensure research integrity and transparency.

6. Review of SFI Disclosures

The DO is responsible for reviewing all SFI disclosures. Each SFI will be evaluated in relation to every PHS/NIH research application or award on which the Investigator is responsible for the design, conduct, or reporting of research, to determine whether the SFI is related to the funded research and, if so, whether it constitutes a Financial Conflict of Interest (FCOI).

SFI disclosures will be reviewed as follows:

- **Prior to the issuance of a new award:** The DO will review Investigator SFIs before NIH issues a new award. If an FCOI is identified, an FCOI report will be submitted to NIH via the eRA Commons FCOI Module prior to any expenditure of funds.
- **Annual SFI disclosure:** As part of the annual disclosure process, Investigators must provide updated information on any previously disclosed SFIs. The DO will review updates to determine whether changes to an existing management plan are needed. Any modifications will be reflected in the next Annual FCOI report submitted to NIH, if applicable.
- **During the award period:** If a new Investigator joins a project or an existing Investigator acquires or discovers a new SFI during the project, the DO will, within 60 days: (1) review the disclosure; (2) determine whether the SFI is related to the PHS/NIH-funded research; (3) determine whether an FCOI exists; and, if so, (4) implement, on at least an interim basis, a management plan. An FCOI report will be submitted to NIH within 60 days of identifying the FCOI.

7. Relatedness of SFI to PHS/NIH-Funded Research and FCOI Determination

The DO is responsible for assessing the relatedness of SFIs to NIH-funded research and determining when they constitute a FCOI.

7.1 Relatedness Test

The DO determines whether an Investigator's SFI is related to research under an NIH award. An SFI is considered "related" when the DO reasonably determines that:

- The SFI could be affected by the PHS/NIH-funded research, or
- The SFI is in an entity whose financial interests could be affected by the PHS/NIH-funded research.

The DO may consult with the Investigator when assessing whether an SFI is related to the research.

7.2 FCOI Determination

An FCOI exists when the DO reasonably determines that the SFI could directly and significantly affect the design, conduct, or reporting of the PHS/NIH-funded research ("significantly" meaning that the financial interest would have a material effect on the research).

8. Management of Financial Conflicts of Interest

Prior to expenditure of PHS/NIH funds, the DO will determine and implement management strategies to ensure the research is conducted objectively. The DO will communicate the determination and management plan in writing to the Investigator, the PI/PD, and the appropriate supervisor. No expenditures on an NIH award may occur until the Investigator has met all disclosure requirements and agreed in writing to comply with the management plan.

Examples of management conditions include:

1. Public disclosure of the FCOI (e.g., in publications or presentations, to study personnel, to the IRB, or to a Data Safety Monitoring Board). While public posting of FCOIs is required only for Senior/Key Personnel, the DO may require disclosure of any Investigator's FCOI as a condition of a management plan.
2. For human subjects research, disclosure of the FCOI to participants in the informed consent document.
3. Appointment of an independent monitor to protect against bias in the design, conduct, and reporting of the research.
4. Modification of the research plan.
5. Change of personnel roles or removal from portions of the research.
6. Reduction or elimination of the financial interest (e.g., divesting equity).
7. Severance of relationships that create the conflict.
8. Independent review of research data.
9. Recusal from specific decisions related to the research.

9. Monitoring Investigator Compliance

Oculogenex will monitor Investigator compliance with the management plan for the duration of the NIH award or until the FCOI no longer exists. Monitoring includes verifying that required public disclosures of FCOIs are made in publications, presentations, and other communications. Investigators must also disclose the FCOI in writing to study personnel and provide a copy of this disclosure to the DO for recordkeeping.

10. Public Access to the FCOI Policy and Related Information

10.1 FCOI Policy

A copy of this FCOI policy is available on Oculogenex's public website, as required by Section 4.1.10 (Financial Conflict of Interest) of the NIH Grants Policy Statement.

10.2 Identified FCOIs Held by Senior/Key Personnel

Before any funds are spent under an NIH award, Oculogenex will ensure public accessibility of FCOI information—either by posting on a publicly accessible website or by providing a written response within five (5) business days to requests—for any SFI that meets all three of the following criteria:

- The SFI was disclosed and is still held by Senior/Key Personnel (the PD/PI and any other individual identified by Oculogenex as senior/key personnel in the application, progress report, or other NIH submission).
- Oculogenex has determined that the SFI is related to the NIH-funded research.
- Oculogenex has determined that the SFI constitutes an FCOI.

When applicable, Oculogenex will make available at least the following information:

- Investigator's name
- Investigator's title and role with respect to the research project
- Name of the entity in which the SFI is held
- Nature of the SFI
- Approximate dollar value of the SFI in the following ranges: $0–$4,999; $5,000–$9,999; $10,000–$19,999; amounts between $20,000 and $100,000 by increments of $20,000; amounts above $100,000 by increments of $50,000; or a statement that the value cannot be readily determined by public prices or reasonable fair market value measures.

Any written response will note that the information provided is current as of the date of the correspondence and is subject to updates on at least an annual basis and within 60 days of Oculogenex's identification of a new FCOI.

If Oculogenex uses a publicly accessible website to meet this requirement, the information will be updated at least annually and within 60 days of: (a) receiving or identifying an additional SFI of Senior/Key Personnel related to the NIH-funded research that was not previously disclosed; or (b) a new SFI being disclosed by Senior/Key Personnel joining the project and determined by the DO to be related and to constitute an FCOI. Information on SFIs subject to public accessibility will remain available for at least three years from the most recent update.

11. Reporting Financial Conflicts of Interest to NIH

Prior to spending any funds under an NIH-funded award, Oculogenex will submit an FCOI report to NIH via the **eRA Commons FCOI Module** for any Investigator's SFI determined to be an FCOI, and will ensure that the Investigator has agreed to and begun implementing the associated management plan. FCOI reports are submitted only when an award is active and an FCOI has been identified.

Oculogenex will designate the DO (or another institutional official) as the FCOI Signing Official (FCOI SO) in the eRA Commons FCOI Module, authorized to submit FCOI reports to NIH. Instructions for preparing and submitting FCOI reports are available in the NIH eRA Commons FCOI Module User Guide at: https://www.era.nih.gov/files/fcoi_user_guide.pdf.

11.1 Initial (Original) FCOI Reports

- **Prior to the expenditure of funds:** If an FCOI is identified at the time a new NIH award is issued, the FCOI SO will submit an "Original" FCOI report through the eRA Commons FCOI Module before any funds are spent, including all information required under 42 CFR 50.605(b)(3).
- **Within 60 days during the award:** If an FCOI is identified during the award period (e.g., a new SFI is disclosed or a new Investigator joins the project), Oculogenex must submit an Original FCOI report within 60 days of identifying the FCOI.

11.2 Annual FCOI Reports

For the duration of an award, including any extensions with or without funds, Oculogenex must submit an annual FCOI report to NIH. This report will indicate whether each previously reported FCOI is still being managed or no longer exists, and describe any changes to the management plan. The annual report must be submitted at the same time as the Research Performance Progress Report (RPPR), multi-year progress report, or at the time of any grant extension. Annual FCOI reports are not required at grant closeout.

11.3 Revision and Mitigation FCOI Reports

After completing a retrospective review, Oculogenex will submit a Revision report to NIH if new information about the FCOI is discovered, or a Mitigation report if the review finds that bias has occurred.

11.4 Summary of Required FCOI Reports

REPORT TYPE	CONTENT REQUIRED	WHEN REQUIRED
New (Initial) FCOI Report	Grant number; PI name; name of entity with FCOI; nature of FCOI; value of financial interest (in required dollar increments); description of how the financial interest relates to the research; key elements of the management plan.	Prior to expenditure of funds on a new award; within 60 days of identifying any new FCOI during the award period.
Annual FCOI Report	Status of the FCOI (whether still managed or no longer exists) and any changes to the management plan.	Submitted annually at the same time as the annual progress report, multi-year progress report, or at the time of a grant extension.
Revised FCOI Report	Updates to a previously submitted FCOI report describing actions taken or to be taken to manage the FCOI going forward.	Following a retrospective review when noncompliance with the regulation is identified, if applicable.
Mitigation Report	Project number; project title; contact PI/PD; name of Investigator with FCOI; name of entity with FCOI; reason for review; detailed methodology, findings, and conclusions; impact of bias; plan of corrective action.	After a retrospective review when bias is found.

12. Training Requirements

Each Investigator will be informed of Oculogenex's FCOI Policy and trained on their responsibilities to disclose foreign and domestic SFIs under this policy and 42 CFR Part 50 Subpart F. Training must be completed before an Investigator engages in PHS/NIH-funded research, and at least once every four years thereafter. Training must also be completed promptly when any of the following occur:

- Oculogenex revises this policy or related procedures in a way that affects Investigator requirements.
- An Investigator is new to Oculogenex research under an NIH award (training must be completed before participating in the research).
- Oculogenex determines that an Investigator has not complied with this policy or with a management plan issued under it (training must be completed within 30 days as directed by the DO).

To meet the NIH training requirement, Oculogenex requires Investigators to complete the NIH FCOI tutorial at: https://grants.nih.gov/grants/policy/coi/tutorial2018/story_html5.html, and to print and retain the completion certificate for audit purposes.

Investigators are also required to review the NIH Virtual Seminar presentation on FCOI compliance at: https://www.youtube.com/watch?v=D292YZ6BX24.

13. Noncompliance With FCOI Policy and Corrective Actions

If Oculogenex identifies an SFI that was not disclosed, reviewed, or managed in a timely manner, the DO will, within 60 days: review the SFI; determine whether it is related to NIH-funded research; determine whether it constitutes an FCOI; and, if so, implement an interim management plan describing actions that have been and will be taken to manage the FCOI going forward. Oculogenex will also submit an FCOI report to NIH via the eRA Commons FCOI Module.

In cases of noncompliance, including:

- Failure by the Investigator to disclose an SFI that is later determined to constitute an FCOI;
- Failure by Oculogenex to review or manage an FCOI; or
- Failure by the Investigator to comply with an established management plan,

Oculogenex will, within 120 days of identifying noncompliance:

- Conduct a retrospective review of the Investigator's activities and the NIH-funded research to determine whether the research, or any part of it, was biased in the design, conduct, or reporting. The retrospective review shall document: project number; project title; Principal Investigator; name of the Investigator with the FCOI; name of the entity involved; reason for the review; methodology used; findings; and conclusions.
- Document the retrospective review in accordance with 42 CFR 50.605(a)(3)(ii)(B).

If bias is found, Oculogenex will promptly notify NIH and submit a mitigation report as required by 42 CFR 50.605(a)(3)(iii). The report will include: (a) the impact of the bias on the research project; and (b) the plan of action or corrective steps taken to eliminate or mitigate the effect of the bias. Oculogenex will thereafter submit FCOI reports annually to NIH as required. See also NIH FAQs at: https://grants.nih.gov/faqs#/financial-conflict-of-interest.htm.

Depending on the circumstances, Oculogenex may implement additional interim measures regarding the Investigator's participation in the research until the retrospective review is complete. If no bias is found, no further action is required.

14. Clinical Research Requirements

Oculogenex recognizes that clinical research involving human subjects requires heightened scrutiny of financial interests. For clinical studies, the DO shall evaluate whether any Significant Financial Interest could directly and significantly affect subject safety, informed consent, recruitment, study oversight, data analysis, interpretation of results, or reporting of findings.

If HHS determines that a PHS-funded clinical research project evaluating the safety or effectiveness of a drug, medical device, or treatment was designed, conducted, or reported by an Investigator with an unmanaged or unreported FCOI, Oculogenex will require the Investigator to disclose the conflict in every public presentation of the research results and to request an addendum to previously published presentations.

Management measures for clinical research may include:

- Disclosure of the FCOI to research participants through informed consent documents, when appropriate.
- Disclosure to Institutional Review Boards (IRBs), Data Safety Monitoring Boards (DSMBs), sponsors, and regulatory authorities.
- Independent medical monitoring of the study.
- Independent review of study data.
- Additional oversight measures deemed necessary by the DO.

15. Subrecipient Requirements

A subrecipient relationship exists when federal funds flow from or through Oculogenex to another individual or entity that will carry out a substantive portion of a PHS-funded research project and is accountable to Oculogenex for programmatic outcomes and compliance. Subrecipients (e.g., collaborators, consortium members, consultants, contractors, subcontractors, and sub-awardees) are subject to Oculogenex's terms and conditions. Oculogenex will take reasonable steps to ensure that all subrecipient Investigators comply with the federal FCOI regulations at 42 CFR Part 50 Subpart F.

Oculogenex will include in each written agreement with a subrecipient terms specifying whether Oculogenex's FCOI Policy or the subrecipient's own FCOI policy will apply to subrecipient Investigators.

- **If the subrecipient's FCOI policy applies:** The subrecipient institution must certify in the agreement that its policy complies with federal FCOI regulations. The agreement will specify the timeframe for the subrecipient to report identified FCOIs to Oculogenex in time for Oculogenex to meet NIH reporting deadlines (i.e., before funds are spent and within 60 days of the subrecipient identifying an FCOI). Typically, this means requiring subrecipients to report FCOIs to Oculogenex within 50–55 days of identification. Oculogenex's DO will then submit the subrecipient FCOI report to NIH through the eRA Commons FCOI Module.
- **If the subrecipient cannot certify compliance:** The agreement will specify that Oculogenex's FCOI Policy applies. In this case, subrecipient Investigators must disclose their SFIs directly to Oculogenex, including SFIs directly related to the subrecipient's

work. The agreement will allow sufficient time for Oculogenex to review, manage, and report any resulting FCOIs. When an FCOI is identified, Oculogenex will implement a management plan, monitor compliance by the subrecipient Investigator, and submit the required FCOI report to NIH via the eRA Commons FCOI Module.

16. Maintenance of Records

Oculogenex will maintain records of all Investigator financial interest disclosures, Oculogenex's review and response to those disclosures (whether or not they resulted in a determination of an FCOI), and any actions taken under this policy or through retrospective review. These records will be retained for at least three (3) years from the date of submission of the final expenditures report, or for longer periods as specified in 45 CFR 75.361 for specific situations. Oculogenex will retain these records for each competitive segment as required by regulation.

17. Enforcement Actions for Investigator Noncompliance

Compliance with this policy is a condition of employment and/or participation for all applicable Investigators. Investigators who fail to comply may be subject to disciplinary action, which can include:

- Termination of employment or contract;
- Formal warning letter or official notice of disciplinary action;
- Restrictions on the use of research funds;
- Suspension or removal from research activities or project responsibilities; and/or
- Disqualification from further participation in any PHS/NIH-funded research, as deemed appropriate.

18. Useful FCOI and NIH Resources

Resource	Link
NIH FCOI-related inquiries (email)	fcoicompliance@mail.nih.gov
FCOI Regulation — 42 CFR Part 50 Subpart F	https://www.ecfr.gov/current/title-42/chapter-I/subchapter-D/part-50/subpart-F
NIH Financial Conflict of Interest Policy	https://grants.nih.gov/policy-and-compliance/policy-topics/fcoi
NIH FCOI Training Tutorial	https://grants.nih.gov/grants/policy/coi/tutorial2018/story_html5.html
NIH FCOI Frequently Asked Questions (FAQs)	https://grants.nih.gov/faqs#/financial-conflict-of-interest.htm

NIH eRA Commons FCOI Module User Guide	https://www.era.nih.gov/files/fcoi_user_guide.pdf
Information for Foreign Grants	https://grants.nih.gov/new-to-nih/information-for/foreigngrants
NIH Welcome Wagon Letter for New Recipients	https://grants.nih.gov/policy-and-compliance/welcomewagon

19. Point of Contact

For questions related to this FCOI Policy or to disclose a financial interest, contact:

Designated Official (DO)
Ramaswamy L. Ramkumar, PhD
Chief Operating Officer
Oculogenex, Inc.