

## **Hydropore Technologies LLC Conflict of Interest (COI) Policy, (October 23, 2024)**

### **1. Purpose**

The purpose of this policy is to ensure that all Hydropore personnel and staff engage in business activities free from conflicts that could compromise the integrity of the company's mission and operations.

### **2. Scope**

This policy applies to all Hydropore employees, consultants, advisors, and collaborators (collectively, "personnel") who contribute to the company's work. It includes senior/key personnel, subrecipients, and partners, such as universities.

### **3. Definitions**

- **Conflict of Interest (COI):** Situations where personal, financial, or organizational interests may bias professional decision-making or activities at Hydropore.
- **Financial Interest:** Anything of monetary value, including ownership, salary, or intellectual property interests.

### **4. Disclosure Requirements**

All Hydropore personnel must:

- Disclose **any financial or personal interests** that might create a COI.
- Submit disclosures before starting work on projects, annually, or when new conflicts arise.

Disclosures should include, but are not limited to, equity holdings, consulting fees, ownership interests, or relationships with external partners.

### **5. Conflict Management**

Once a COI is disclosed, Hydropore will evaluate it. Potential management strategies may include:

- Public disclosure of the conflict.
- Adjusting roles or responsibilities.
- Divesting financial interests or severing relationships.

Hydropore will ensure that all personnel comply with the determined management plan.

### **6. Enforcement and Compliance**

Failure to comply with this policy will result in disciplinary actions, which could include project removal or termination of employment. Compliance will be monitored continuously to ensure transparency and adherence to ethical standards.

### **7. Organizational Conflicts of Interest**

Hydropore will actively avoid and mitigate organizational conflicts by maintaining impartiality in its business relationships, particularly when engaging with affiliates, universities, or other partners. Staff must disclose any business or procurement decisions that might involve related entities, and these relationships will be reviewed to avoid bias.

### **8. Collaboration with the University of Pennsylvania**

As a Penn UPstart company, Hydropore collaborates closely with the University of Pennsylvania (Penn) for research and materials characterization. While leveraging Penn's resources, such as renting lab space at the Pennovation Center, Hydropore commits to ensuring that any potential conflicts of interest related to this partnership are disclosed and managed appropriately. Any personnel with ties to Penn or using its facilities must disclose any relationships that could pose a conflict, ensuring transparency and compliance with Hydropore's policies and DOE regulations.