MCM6 Therapeutics, Inc.

Financial Conflict of Interest (FCOI) Policy
for Public Health Service (PHS)/NIH-Funded Research

Company	MCM6 Therapeutics, Inc.
State of Incorporation	Delaware
Address	15 Fiske Road, Lexington, MA 02420
Effective Date	June 2, 2026
Approval Authority	Board of Directors
FCOI Officer / Institutional Official	Matthew Stremlau
Backup Reviewer	Kelvin Lam
FCOI Contact	info@mcm6.com

This policy is intended for submission to NIH through the eRA Commons Institution Profile (IPF) Module and for public availability as required by the PHS FCOI regulation. This document should be reviewed by MCM6 Therapeutics, Inc. and legal counsel before final approval and implementation.

Approved by Board of Directors:	Date: June 2, 2026
Printed Name / Title:	Matthew Stremlau, CEO
Signature:	
Effective Date:	June 2, 2026

1. Purpose

MCM6 Therapeutics, Inc. (“MCM6” or the “Company”) is committed to promoting objectivity in research and ensuring that the design, conduct, and reporting of research funded by the Public Health Service (“PHS”), including the National Institutes of Health (“NIH”), are free from bias resulting from Investigator financial conflicts of interest (“FCOIs”).

This policy establishes standards and procedures for disclosure, review, management, reporting, training, record retention, and enforcement of financial interests related to PHS/NIH-funded research. It is designed to comply with 42 CFR Part 50 Subpart F and applicable NIH Grants Policy Statement requirements.

2. Scope

This policy applies to all PHS/NIH-funded research for which MCM6 is the applicant, recipient, or awardee, including Phase II STTR awards. It applies to each Investigator who is planning to participate in, or is participating in, PHS/NIH-funded research under MCM6’s institutional responsibilities, regardless of title or position.

For purposes of this policy, “Investigator” includes the PD/PI and any other person, regardless of title or position, who is responsible for the design, conduct, or reporting of PHS/NIH-funded research. This may include employees, officers, founders, consultants, collaborators, subrecipient personnel, scientific advisors, and others when their role gives them responsibility for the design, conduct, or reporting of the research.

MCM6’s current PHS/NIH-funded project includes NIH/NIA Phase II STTR award/application 2R42AG087802-02, “Targeting Brain Lipid Dysregulation in APOE4 Alzheimer’s Disease with ACC Antisense Oligonucleotides,” with Kelvin Lam as PD/PI. This project reference is included for implementation context; the policy applies institution-wide to PHS/NIH-funded research at MCM6.

3. Regulatory References

- 42 CFR Part 50 Subpart F, Promoting Objectivity in Research.
- NIH Grants Policy Statement, Section 4.1.10, Financial Conflict of Interest.
- NIH Guide Notice NOT-OD-21-002, Required Submission of Financial Conflict of Interest Policy into the eRA Commons Institution Profile (IPF) Module.
- Any award-specific terms and conditions included in the NIH Notice of Award.

4. Definitions

Company or Institution: MCM6 Therapeutics, Inc.

Designated Official(s) / FCOI Officer: MCM6 will designate one or more officials to solicit and review Investigator disclosures of Significant Financial Interests, determine whether an SFI is related to PHS/NIH-funded research, determine whether an FCOI exists, implement or oversee management plans when needed, and submit required FCOI reports to NIH. The MCM6 FCOI Officer is Matthew Stremlau. The backup reviewer is Kelvin Lam, except where Kelvin Lam has a conflict; in such cases, the Board of Directors will designate a disinterested Board member or outside counsel to conduct or assist with the review.

Financial Conflict of Interest (FCOI): A Significant Financial Interest that is related to PHS/NIH-funded research and that MCM6 reasonably determines could directly and significantly affect the design, conduct, or reporting of PHS/NIH-funded research.

Financial Interest: Anything of monetary value, whether or not the value is readily ascertainable.

Institutional Responsibilities: An Investigator’s professional responsibilities performed on behalf of MCM6, including research, research consultation, product development, grant preparation, scientific advisory work, committee service, fundraising activities, project leadership, protocol development, data analysis, reporting, publication, regulatory activities, and any other professional activity performed on behalf of MCM6.

Investigator: The PD/PI and any other person, regardless of title or position, who is responsible for the design, conduct, or reporting of PHS/NIH-funded research, including collaborators and consultants when applicable.

PHS/NIH-funded Research: Research funded or proposed for funding by PHS, including NIH grants and cooperative agreements, and any research subject to the PHS FCOI regulation by award terms.

Research: A systematic investigation, study, or experiment designed to develop or contribute to generalizable knowledge relating broadly to public health, including basic research, applied research, and product development.

Senior/Key Personnel: The PD/PI and any other person identified as senior/key personnel in a grant application, progress report, or other report submitted to PHS/NIH.

Significant Financial Interest (SFI): A Financial Interest of the Investigator, or the Investigator's spouse or dependent children, that reasonably appears to be related to the Investigator's Institutional Responsibilities and meets the thresholds or categories described in Section 5.

Subrecipient: A third party that receives a subaward from MCM6 to carry out part of a PHS/NIH-funded research project, including academic partners, research institutions, and other entities.

5. Significant Financial Interests

Each Investigator must disclose all SFIs, including those of the Investigator's spouse and dependent children, that reasonably appear to be related to the Investigator's Institutional Responsibilities. MCM6 will treat the following as SFIs when they meet the applicable regulatory thresholds.

5.1 Publicly Traded Entities

With regard to any publicly traded entity, an SFI exists if the value of any remuneration received from the entity in the twelve months preceding the disclosure, plus the value of any equity interest in the entity as of the date of disclosure, exceeds $5,000. Remuneration includes salary and any payment for services not otherwise identified as salary, including consulting fees, honoraria, and paid authorship. Equity interests include stock, stock options, or other ownership interests, as determined through reference to public prices or other reasonable measures of fair market value.

5.2 Non-Publicly Traded Entities

With regard to any non-publicly traded entity other than MCM6, an SFI exists if the Investigator or the Investigator's spouse or dependent children received remuneration from the entity in the twelve months preceding the disclosure that exceeds $5,000, or holds any equity interest in the entity, including stock, stock options, warrants, membership interests, convertible interests, or other ownership interests.

For avoidance of doubt, because MCM6 is a commercial, for-profit company, ownership interests in MCM6 held by an Investigator are excluded from the SFI definition under this policy. Salary, royalties, or other remuneration paid by MCM6 to an Investigator who is employed or appointed by MCM6 are also excluded from the SFI definition, but MCM6 may document these interests internally where useful for transparency.

5.3 Intellectual Property

Income related to intellectual property rights and interests, such as patents, patent applications, copyrights, royalties, licensing income, or milestone payments, is an SFI upon receipt of income related to such rights and interests, unless excluded under Section 5.5.

5.4 Sponsored or Reimbursed Travel

Investigators must disclose the occurrence of any reimbursed or sponsored travel related to their Institutional Responsibilities, including the purpose of the trip, sponsor or organizer, destination, and duration. MCM6 may request additional information, including monetary value, to determine whether the travel constitutes an FCOI.

5.5 Exclusions from SFI Definition

The following are not considered SFIs under this policy:

- Salary, royalties, or other remuneration paid by MCM6 to an Investigator if the Investigator is currently employed or appointed by MCM6, including intellectual property rights assigned to MCM6 and agreements to share in royalties related to such rights.
- Income from investment vehicles such as mutual funds and retirement accounts, provided the Investigator does not directly control the investment decisions made in those vehicles.

- Income from seminars, lectures, teaching engagements, service on advisory committees, or service on review panels sponsored by a federal, state, or local government agency; a U.S. institution of higher education; a U.S. academic teaching hospital; a U.S. medical center; or a research institute affiliated with a U.S. institution of higher education.
- Travel reimbursed or sponsored by a federal, state, or local government agency; a U.S. institution of higher education; a U.S. academic teaching hospital; a U.S. medical center; or a research institute affiliated with a U.S. institution of higher education.

5.6 Foreign Financial Interests

Investigators must disclose foreign financial interests that meet the SFI definition, including remuneration, equity, intellectual property income, sponsored or reimbursed travel, appointments, advisory roles, consulting relationships, and other financial interests with foreign entities. Exclusions for seminars, lectures, teaching, advisory committees, review panels, and sponsored or reimbursed travel apply only to U.S. entities identified in Section 5.5 and do not automatically exclude foreign financial interests.

6. Investigator Disclosure Requirements

Each Investigator must complete MCM6's SFI Disclosure Form before engaging in PHS/NIH-funded research, at least annually thereafter at the time prescribed by MCM6 during the period of the award, and within thirty (30) days of discovering or acquiring a new SFI, including by purchase, marriage, inheritance, new outside appointment, new consulting relationship, receipt of sponsored travel, or other means.

MCM6 will not permit an Investigator to begin work on PHS/NIH-funded research until the Investigator has completed required FCOI training and submitted a current SFI Disclosure Form. Any new Investigator who joins a project after an NIH application has been submitted or during the course of an award must submit the SFI Disclosure Form promptly and before participating in the project. Completed disclosure forms will be submitted to MCM6's designated official(s) and maintained in MCM6's secure records system. At the effective date of this policy, MCM6 maintains FCOI records in Dropbox with access restricted to authorized personnel.

Investigators have a continuing obligation to disclose SFIs accurately, completely, and promptly. Failure to disclose may result in corrective action under Section 16.

7. Review of Disclosures and FCOI Determinations

MCM6's designated official(s), including the FCOI Officer or a designated alternate when the FCOI Officer has a conflict, will review each Investigator's disclosed SFI to determine whether the SFI is related to PHS/NIH-funded research and whether it constitutes an FCOI. MCM6 may consult with the Investigator when assessing relatedness or the need for management, but MCM6 is responsible for making the final determination.

In making the relatedness determination, MCM6 will determine whether the SFI could be affected by the PHS/NIH-funded research or is in an entity whose financial interest could be affected by the research. MCM6 may involve the Board of Directors, a disinterested Board member, outside counsel, or another qualified independent reviewer in making these determinations, particularly where the SFI involves a founder, officer, Board member, or senior/key person.

An FCOI exists when MCM6 reasonably determines that the SFI could directly and significantly affect the design, conduct, or reporting of the PHS/NIH-funded research. All determinations will be documented in writing, including the disclosed SFI, the relatedness analysis, the FCOI determination, and any management plan or rationale for no management plan.

8. Management of FCOIs

If MCM6 determines that an FCOI exists, MCM6 will develop and implement a written management plan before expenditure of PHS/NIH funds or, for newly identified FCOIs, within the timeframe required by regulation. The Board of Directors has authority to approve, impose, and modify management plans. For conflicts involving founders, officers, or senior/key personnel, MCM6 may use a disinterested Board member, outside counsel, or another independent reviewer to assist with management.

A management plan may include one or more of the following measures, as appropriate to the nature and severity of the FCOI:

- Public disclosure of the FCOI, including in publications and presentations when appropriate.
- Disclosure of the FCOI to research team members, collaborators, subrecipients, consultants, and trainees.
- Independent monitoring of the research, data analysis, or reporting.
- Modification of the research plan, protocol, data analysis plan, or reporting structure.
- Change of personnel or personnel responsibilities, including recusal from certain decisions or activities.
- Disqualification of the Investigator from participation in all or part of the research.
- Reduction, divestiture, or elimination of the financial interest.
- Severance or modification of relationships that create the FCOI.
- Appointment of an independent reviewer or oversight committee.
- Additional measures deemed necessary by the Board of Directors or FCOI Officer to protect objectivity in the research.

Each management plan will identify the Investigator, the SFI and FCOI, the role and principal duties of the conflicted Investigator, the conditions of the management plan, how the plan is designed to safeguard objectivity in the research, confirmation of the Investigator's agreement, how the plan will be monitored, who is responsible for monitoring, and any required reporting or update schedule. MCM6 will communicate the management plan in writing to the Investigator and will monitor compliance for the duration of the NIH-funded project, which may include review of publications, presentations, communications, or other documentation when relevant to the management plan.

9. NIH Reporting

MCM6 will submit required FCOI reports to NIH through eRA Commons as required by 42 CFR Part 50 Subpart F and NIH policy. FCOI reports are required only when an NIH award is active and MCM6 has identified an FCOI, unless NIH requires otherwise. Matthew Stremlau and Kelvin Lam are responsible for ensuring that required FCOI reports are submitted, with Board oversight as appropriate.

MCM6 will submit an initial FCOI report to NIH before expenditure of funds for any SFI that MCM6 determines is an FCOI. For FCOIs identified after the initial report, including for a new Investigator or newly disclosed SFI, MCM6 will review the SFI, determine whether it is an FCOI, implement any required management plan, and submit an FCOI report to NIH within sixty (60) days of identification, as required.

For each previously reported FCOI, MCM6 will submit annual FCOI reports to NIH for the duration of the project period, including extensions with or without funds, at the same time as the annual progress report, multi-year progress report if applicable, or at such other time as NIH requires. Annual reports will address the status of the FCOI and any changes to the management plan.

FCOI reports will include the information required by NIH, such as the project number, PD/PI, name of the Investigator with the FCOI, name of the entity with which the Investigator has an FCOI, nature of the financial interest, value or value range where applicable, description of how the financial interest relates to the NIH-funded research, and key elements of the management plan.

10. Public Accessibility of Policy and FCOI Information

MCM6 will maintain this policy as an up-to-date, written, and enforced FCOI policy. MCM6 will submit a PDF copy of this policy to NIH through the eRA Commons Institution Profile (IPF) Module as required by NIH.

MCM6 has a public website and its FCOI policy is available at: https://mcm6.com/. MCM6 will also make this written policy available to any requestor within five (5) business days of a request sent to info@mcm6.com.

MCM6 will also make information concerning identified FCOIs held by senior/key personnel publicly accessible as required by regulation. This requirement applies to SFIs that are disclosed and still held by senior/key personnel, that MCM6 determines are related to NIH-funded research, and that MCM6 determines constitute an FCOI. MCM6 may satisfy this requirement by posting the required information on a publicly accessible website or by providing a written response within five (5) business days of a written request sent to info@mcm6.com. Matthew Stremlau is responsible for coordinating responses to such requests.

Publicly accessible FCOI information will include, at a minimum, the Investigator's name, title and role with respect to the research project, name of the entity in which the SFI is held, nature of the SFI, and approximate dollar value of the SFI within regulatory ranges or a statement that the value cannot be readily determined through reference to public prices or other reasonable measures of fair market value. Information provided publicly will be updated as required by regulation and will remain available for at least three (3) years from the date the information was most recently updated.

11. Subrecipient Requirements

When MCM6 carries out PHS/NIH-funded research through a subrecipient, MCM6 will take reasonable steps to ensure that each subrecipient Investigator complies with applicable FCOI requirements. MCM6 will incorporate FCOI terms into each written subaward or collaboration agreement as required.

The written agreement will specify whether the subrecipient will follow its own PHS-compliant FCOI policy or MCM6's policy. If the subrecipient follows its own policy, the subrecipient must certify that its policy complies with the PHS FCOI regulation and must report identified FCOIs to MCM6 in sufficient time for MCM6 to meet NIH reporting obligations. If the subrecipient follows MCM6's policy, the agreement will specify the timing for subrecipient Investigator disclosures to MCM6 so that MCM6 can complete required reviews, management, and reports.

For the current Phase II STTR project, the Icahn School of Medicine at Mount Sinai is the academic STTR partner and is expected to maintain and apply its own PHS-compliant FCOI policy. Matthew Stremlau is responsible for collecting subrecipient FCOI certifications and any required subrecipient FCOI reports.

12. Investigator Training

Each Investigator must complete FCOI training before engaging in PHS/NIH-funded research and at least every four (4) years thereafter. Training will address this policy, the Investigator's responsibility to disclose domestic and foreign SFIs, and the PHS/NIH FCOI regulation. Investigators must also complete training immediately when MCM6 revises this policy in a manner that affects Investigator requirements, when an Investigator is new to MCM6 PHS/NIH-funded research, or when MCM6 determines that an Investigator is not in compliance with this policy or a management plan.

MCM6 will use the NIH FCOI training module or another training program that addresses PHS FCOI requirements. Matthew Stremlau is responsible for tracking training completion and maintaining training certificates or attestations in MCM6's secure records system, currently Dropbox.

13. New or Untimely Disclosures; Retrospective Review

If MCM6 identifies an SFI that was not disclosed in a timely manner or was not previously reviewed, including because an Investigator failed to disclose the SFI or MCM6 failed to review or manage it, MCM6 will review the SFI within sixty (60) days to determine whether it is related to PHS/NIH-funded research and whether an FCOI exists. If an FCOI exists, MCM6 will implement, at least on an interim basis, a management plan and submit an FCOI report to NIH as required.

If an FCOI was not identified or managed in a timely manner, MCM6 will complete and document a retrospective review within one hundred twenty (120) days of determining noncompliance to assess whether the PHS/NIH-funded research, or any portion of it, was biased in design, conduct, or reporting. The retrospective review will document the project number, project title, PD/PI, Investigator with the FCOI, entity involved, reason for the retrospective review, methodology used, findings, and conclusions.

If bias is found, MCM6 will promptly notify NIH and submit a mitigation report addressing the impact of the bias and the actions taken or planned to eliminate or mitigate the effect of the bias. MCM6 will thereafter submit FCOI reports as required.

14. Clinical Research

If HHS determines that a PHS-funded project of clinical research whose purpose is to evaluate the safety or effectiveness of a drug, medical device, or treatment was designed, conducted, or reported by an Investigator with an FCOI that was not managed or reported as required, MCM6 will require the Investigator to disclose the

FCOI in each public presentation of the results of the research and to request an addendum to previously published presentations or publications, as required by regulation.

15. Records Retention

MCM6 will maintain records of Investigator disclosures, MCM6's review and response to disclosures, FCOI determinations, management plans, training records, subrecipient certifications and reports, public requests and responses, NIH reports, retrospective reviews, mitigation reports, and related documentation for at least three (3) years from the date the final expenditures report is submitted to NIH, or longer if required by applicable law, award terms, audit, inquiry, investigation, litigation, or other federal record-retention requirements. Upon request, MCM6 will make information available to NIH or HHS regarding Investigator disclosures and MCM6's review of and response to those disclosures, whether or not the disclosure resulted in an FCOI determination.

16. Enforcement and Noncompliance

Investigators must comply with this policy, complete required training, submit accurate and timely disclosures, cooperate with FCOI reviews, and comply with any management plan. Failure to comply may result in corrective action, which may include additional training, written warning, modification of responsibilities, removal from the research project, suspension of research activities, termination of consulting or employment relationship, repayment or disallowance of costs if required, notification to NIH, or other actions deemed appropriate by the Board of Directors.

MCM6 will take corrective action when it identifies noncompliance with this policy, including failure to disclose an SFI, failure to comply with a management plan, or failure to complete required training. MCM6 will notify NIH and submit required retrospective reviews, mitigation reports, revised FCOI reports, and other information as required.

17. Confidentiality

MCM6 will handle SFI disclosures and FCOI review materials as confidential business and personnel records, except to the extent disclosure is required to NIH, HHS, auditors, subrecipients, research partners, the public, or others under applicable law, regulation, award terms, this policy, or a management plan.

18. Policy Review and Updates

The FCOI Officer will review this policy periodically and recommend updates to the Board of Directors as needed to maintain compliance with PHS/NIH requirements. The Board of Directors must approve material revisions. MCM6 will submit updated versions of this policy to NIH through the eRA Commons IPF Module when required and will update public availability information accordingly.

Appendix A. Significant Financial Interest Disclosure Form

Instructions: Complete this form before engaging in PHS/NIH-funded research, at least annually at the time prescribed by MCM6 during the award period, and within 30 days of discovering or acquiring a new SFI. Disclose interests of yourself, your spouse, and your dependent children that reasonably appear to be related to your Institutional Responsibilities. Disclosure is not limited to interests related only to a specific funded project.

Field	Response
Investigator name	
Title / role	
Employer / institution	
Project title or award number	
PD/PI	
Date of disclosure	
Type of disclosure	Initial / Annual / Updated / Travel / Other

A. Role in PHS/NIH-funded research

Question	Response
Are you responsible for the design, conduct, or reporting of PHS/NIH-funded research?	Yes / No. If yes, describe role.
Are you senior/key personnel on the project?	Yes / No
Are you an employee, officer, founder, Board member, consultant, collaborator, SAB member, subcontractor, or other?	Describe.

B. Financial interests. Do you, your spouse, or your dependent children have any Significant Financial Interests that reasonably appear to be related to your Institutional Responsibilities for MCM6? For each item marked “Yes,” attach details including entity name, nature of interest, approximate value or value range if known, whether the interest is held by you/spouse/dependent child, and relationship to your Institutional Responsibilities.

Financial interest category	**Yes/No**	Details / entity / value range / relationship to Institutional Responsibilities
Publicly traded entity: remuneration in prior 12 months plus equity value exceeds $5,000.		
Non-publicly traded entity other than MCM6: remuneration in prior 12 months exceeds $5,000 or any equity interest is held.		
Outside ownership, compensation, consulting, advisory, board, speaking, or other paid role with any entity that reasonably appears related to your Institutional Responsibilities.		
Intellectual property rights, patent applications, patents, royalties, licensing income, or milestone rights.		
Sponsored or reimbursed travel related to Institutional Responsibilities.		
Foreign financial interests, appointments, advisory roles, equity, sponsored travel, research support, or other relationships.		
Other financial interests that may reasonably appear related to Institutional Responsibilities.		

C. Sponsored or reimbursed travel details, if applicable

Trip purpose	Sponsor / organizer	Destination	Duration / dates	Approximate value if known

D. Certification

I certify that I have read MCM6’s FCOI Policy, completed required FCOI training, and disclosed all Significant Financial Interests of myself, my spouse, and my dependent children that reasonably appear to be related to my Institutional Responsibilities. I agree to update this disclosure within 30 days of discovering or acquiring a new SFI and to comply with any FCOI management plan imposed by MCM6.

Investigator signature	Date
Printed name	

Appendix B. FCOI Review Checklist

To be completed by the FCOI Officer, backup reviewer, Board designee, disinterested Board member, or outside counsel, as appropriate.

Review item	Determination / notes
Investigator name and role	
Date disclosure received	
SFI identified?	Yes / No
SFI category and entity	
Could the SFI be affected by the PHS/NIH-funded research? (MCM6 review determination)	Yes / No / Explain
Is the SFI in an entity whose financial interest could be affected by the research? (MCM6 review determination)	Yes / No / Explain
Is the SFI related to the PHS/NIH-funded research?	Yes / No / Explain
Could the SFI directly and significantly affect the design, conduct, or reporting of the research?	Yes / No / Explain
FCOI exists?	Yes / No
Management plan required?	Yes / No
NIH FCOI report required?	Yes / No
Reviewer name and title	
Reviewer signature and date	

Appendix C. FCOI Management Plan Template

Management plan element	Plan details
Investigator with FCOI	
Project title / award number	
PD/PI	
Entity and nature of SFI	
Description of how SFI relates to the research	
Investigator's role and principal duties on the project	
Management measures imposed	
How measures will safeguard objectivity in the research	
Monitoring plan and frequency	
Person responsible for monitoring	
Public disclosure requirements, if any	
Research team/subrecipient disclosure requirements, if any	
Publication/presentation disclosure requirements, if any	
NIH reporting requirements and dates	
Investigator agreement	
Board/FCOI Officer approval	

Appendix D. FCOI Training Log

Investigator	Training provider/module	Completion date	Next due date	Certificate stored
	NIH FCOI Training Module			Dropbox / Other
	NIH FCOI Training Module			Dropbox / Other
	NIH FCOI Training Module			Dropbox / Other

Appendix E. Current Implementation Notes

These notes are for MCM6's internal implementation and may be removed from the public-facing copy if preferred.

- Current MCM6 Investigators identified for the NIH/NIA Phase II STTR project are Matthew Stremlau and Kelvin Lam.
- Matthew Stremlau and Kelvin Lam have equity and stock options in MCM6 and receive salary from MCM6. Because MCM6 is a commercial, for-profit company, these MCM6 ownership and remuneration interests are excluded from the SFI definition under this policy, but MCM6 may document them internally for transparency.
- No outside ownership interests, compensation, or paid roles with other companies reasonably appearing to be related to MCM6 Institutional Responsibilities were identified in the source information provided for this draft.
- No relevant patents, patent applications, licensing rights, IP royalty streams, sponsored or reimbursed travel, or foreign financial interests were identified in the source information provided for this draft.
- Because this appendix contains grant-specific implementation notes, MCM6 may choose to keep it internal and upload/post only the main policy and blank forms.