



## Omni Healthcare Communications LLC

### Conflict of Interest Policy

#### 1. Scope of Services

Omni Healthcare Communications LLC (Omni-HC) is a medical communications agency focused on providing medical affairs programs and services to the life sciences industry. We do not engage in marketing and sales activities.

(Omni-HC) is committed to maintaining the highest ethical standards in all its medical affairs programs. This conflict-of-interest policy (the "Policy") is designed to identify and mitigate potential conflicts of interest that may arise in the course of our work.

#### 2. Purpose

The purpose of this Policy is to:

- Define conflicts of interest
- Establish procedures for identifying and disclosing potential conflicts of interest.
- Provide guidance for managing and mitigating conflicts of interest.
- Ensure that Omni-HC's clients and the public can rely on the objectivity and integrity of our work.

#### 3. Definitions

- **Conflict of Interest:** A situation in which a financial or other interest could potentially compromise, or appear to compromise, the objectivity of Omni's work for a client.

#### 4. Examples of Conflicts of Interest

The following are some examples of potential conflicts of interest:



- **Financial Interest:** An Omni-HC employee or contractor has a financial interest (e.g., ownership interest, investment) in a company that competes with a client of Omni-HC.
- **Personal Relationship:** An Omni-HC employee or contractor has a close personal relationship with someone employed by a competitor of a client of Omni-HC.
- **Gifts and Hospitality:** An Omni-HC employee or contractor receives gifts or hospitality from a source that could be perceived as influencing their work for a client.
- **Former Employment:** An Omni-HC employee or contractor previously worked for a competitor of a client of Omni-HC and may have access to confidential information.
- **Competing Products:** An Omni-HC employee or contractor is working on projects for two clients who have competing products in the same therapeutic area.
- **Dual Loyalties:** An Omni-HC employee or contractor is simultaneously working on a project for a client's medical affairs team and another project for the same client's commercial team.

## 5. Disclosure of Conflicts

All Omni-HC employees and contractors are required to disclose any potential conflicts of interest to their supervisor immediately. The supervisor will then work with the employee or contractor to determine how to manage the conflict. This may involve recusal from working on a particular project, disclosure of the conflict to the client, or other steps as necessary.

## 6. Management of Conflicts

Omni-HC will take steps to manage conflicts of interest in a way that protects the interests of its clients and the public. These steps may include:

- **Recusal:** An employee or contractor may be recused from working on a particular project if a conflict of interest cannot be adequately managed.



- **Disclosure:** Omni-HC may disclose a potential conflict of interest to a client and obtain the client's consent to proceed with the work.
- **Screening:** Omni-HC may establish procedures to screen employees and contractors for potential conflicts of interest before assigning them to projects.
- **Competing Products:** When an employee or contractor is working on projects for two clients with competing products in the same therapeutic area, Omni will take steps to manage the conflict. These steps may include:
  - **Team Segregation:** Assigning separate teams to work on projects for the competing clients.
  - **Information Barriers:** Establishing information barriers to prevent confidential information from being shared between the teams.
  - **Disclosure and Consent:** Disclosing the potential conflict to both clients and obtaining their written consent to proceed with the work, with clear limitations on information sharing.
- **Dual Loyalties:** Omni-HC will avoid any dual loyalty conflicts and focus only on Medical Affairs projects. In the unlikely event a client requires Omni-HC to work on both a Medical Affairs project and a commercial project, Omni-HC will take steps to manage the conflict by:
  - **Firewall:** Implementing a firewall to prevent the transfer of information between the Medical Affairs and commercial projects.
  - **Separate Staff:** Assigning separate staff members to work on the Medical Affairs and commercial projects.
  - **Restricted Access:** Limiting access to confidential information based on project needs.

## 7. Monitoring and Enforcement



This Policy will be reviewed and updated periodically. Omni-HC will also monitor compliance with this Policy and take appropriate disciplinary action in the event of any violations.

## **8. Reporting Concerns**

Any employee or contractor who has a concern about a potential conflict of interest is encouraged to report it to their supervisor, another member of management, or the company's compliance hotline. All reports will be investigated confidentially.

## **9. Conclusion**

Omni-HC is committed to maintaining the highest ethical standards in all its business dealings. This Policy is an important part of that commitment. By following this Policy, Omni-HC can help to ensure that its work is objective, unbiased, and in the best interests of its clients and the public.