

## **Grant Program Policy on Conflicts of Interest — Reviewers and Other Non-Employees Involved in the Awards Process**

As a reviewer for the Alzheimer's Association, please read the following policies, which are specifically applicable to reviewers and all other non-employees involved in the Award process, on Conflict of Interest and Confidentiality and indicate your acceptance.

The Alzheimer's Association is committed to providing an environment free from harassment and discrimination. The Alzheimer's Association strictly prohibits harassment and discrimination based on race; creed; color; religion; gender; sex; sexual orientation; national origin; ancestry; age; veteran status; citizenship status; marital status; physical or mental disabilities; pregnancy, gender identity or expression (including transgender status); and genetic information any other characteristic protected by federal, state or local law. The Alzheimer's Association has policies that variously apply to its employees, applicants, volunteers (including reviewers), visitors, guests, and vendors that extend this prohibition across the organization, and are intended to protect people from unlawful harassment and discrimination by anyone in connection with the performance of their job or volunteer role for the Association.

### **POLICY ON CONFLICTS OF INTEREST**

The Alzheimer's Association ("ALZ"), acting through its review committees, Medical and Scientific Advisory Group ("MSAG"), and volunteers, evaluates applications for, and makes decisions with respect to, research grants, fellowships, career development awards, contracts and active projects (each an "Award"). ALZ wishes to ensure that its evaluation process is as objective as possible and free from conflicts of interest. ALZ recognizes that individuals involved in the Award evaluation and granting process are involved in a variety of organizations and projects, and may hold financial investments, which might create actual or potential conflicts of interest or the appearance of a conflict.

ALZ is committed to assuring that these important decisions regarding research grants and other Awards are made by those who are free of actual or potential conflicts of interest and the appearance of conflicts (each a "conflict" or "conflict of interest"). To achieve that result, the following policy is adopted:

1. Applicability. This Policy applies to committee members (including lay and scientific members of ALZ's scientific research review committees) and other volunteers, including members of the MSAG and other researchers who have volunteered to evaluate Award proposals (collectively, "Covered Persons"). (Employees of ALZ are subject to the ALZ Employee Conflict of Interest Policy, which is substantially similar to the policy described herein.)
2. Determining the Existence of a Conflict. Each Covered Person bears the personal responsibility for initially determining if a conflict of interest exists with respect to such Covered Person. The guidelines set forth below shall be utilized to determine the existence of a conflict. The guidelines are meant to be illustrative and not exclusive; a conflict may exist even though the situation in question is not included below. If a Covered Person has any questions regarding the existence of a conflict, such Covered Person should promptly contact ALZ staff or the chairperson of the committee on which they serve, as the case may be.
3. Guidelines for Determining Existence of Conflict. There are several instances where conflict may exist. A conflict may exist if the Covered Person, or their spouse, parent, child, or other individual with whom such Covered Person has a close personal, business or professional relationship (including persons with whom such Covered Person is a partner, shareholder in a closely-held corporation, co-author or other close professional co-worker or colleague) with an Applicant. As used herein, "Applicant" means any person, firm, corporation, partnership, trust, incorporated or unincorporated association, joint venture, governmental authority, educational institution or any other entity of any kind, which is under consideration by ALZ for an Award.

Other instances where conflict may exist include if the Covered Person:

- i. published a scientific paper with the Applicant in the past four (4) years, excepting instances of large scientific consortia (e.g., Alzheimer's Disease Neuroimaging Initiative) or resulting workshop publication.
- ii. submitted a grant application or received a grant award from any agency as a "co-investigator" or key personnel with the Applicant in the last four (4) years.
- iii. owns, directly or indirectly, any equity interest in the Applicant if a non-publicly traded company or has ownership of more than 1% of the outstanding shares of publicly traded companies.
- iv. is an officer, director, employee, consultant, trustee of, or has a significant governance or management relationship with the Applicant.
- v. owns, directly or indirectly, in whole or in part, any tangible or intangible property that the Applicant uses in the conduct of its business.

- vi. is owed any amount by the Applicant or owes any amount to the Applicant.
- vii. is a party to any agreement for future employment or other agreements or arrangements with Applicant, including co-investigator for any grant application or award within the previous four (4) years.
- viii. has received any gifts with a value, or payments in excess of \$250 from an Applicant in the last four (4) years.
- ix. has any cause of action against, any dispute with, any long-standing scientific or personal differences with, or any claim whatsoever against, the Applicant.
- x. is or was a student or advisor of the Applicant.
- xi. close personal friend of Applicant or any person in senior management of Applicant.
- xii. has a significant ownership, governance, or management relationship with a direct competitor of an Applicant, such that a conflict of interest could be alleged should the Applicant's grant request be rejected.

In addition to the above activities constituting conflicts, the Covered Person should have no conceptual difference of opinion with the Applicant to prevent their ability to provide a fair and equitable review.

4. Disclosure of Conflict; Recusal. If a Covered Person determines that a conflict exists, then such Covered Person shall notify immediately ALZ. ALZ, in collaboration with MSAG as applicable, shall confirm the existence of a conflict. The decision on conflicts and the basis therefore shall be recorded in ALZ's on-line grant system. Unless otherwise determined by the Review Panel Committee Chairperson or the MSAG Chairperson in individual cases, if a conflict is found to exist, the affected person shall recuse themselves from all discussions, determinations and votes with respect to the Applicant with which the conflict exists, and shall excuse themselves from all meetings at which any discussions regarding the Applicant take place. Following the termination of such discussions or determinations concerning the Applicant, such Covered Person may re-join the meeting.

5. Implementation. Each Covered Person shall execute a written statement provided by ALZ stating that such Covered Person has read this Policy on Conflicts of Interest, understands its terms and agrees to comply with the provisions hereof so long as they are a Covered Person. (As noted above, with respect to employees, each employee shall execute a written statement provided by ALZ stating that such employee has read the Employee Handbook, including, without limitation, its conflict of interest provisions, understands its terms and agrees to comply with the provisions thereof.) Such written statements shall be signed by an individual upon their appointment or other act resulting in them being a Covered Person, and periodically thereafter as ALZ determines appropriate.

## POLICY ON CONFIDENTIALITY

The Alzheimer's Association ("ALZ"), acting through its officers, employees, committees, Medical and Scientific Advisory Group ("MSAG"), volunteers, evaluates applications for, and makes decisions with respect to, research grants, fellowships, career development awards, contracts and active projects (each an "Award").

While reviewing applications for Awards, individuals involved in the Award reviewing process and granting process may receive and be given access to Award Materials (as defined below) submitted by an Applicant. As used herein, "Applicant" means any person, firm, corporation, partnership, trust, incorporated or unincorporated association, joint venture, governmental authority, educational institution or any other entity of any kind, which is under consideration by ALZ for an Award.

To ensure that the confidentiality of the Award Materials will be maintained, the Alzheimer's Association's Policy on Reviewer Confidentiality is adopted and applicable to reviewers and all other non-employees involved in the Award review process. (Employees of ALZ are subject to the ALZ Employee Confidentiality Policy, which is like the policy described herein.)

1. Applicability. This Policy applies to ALZ's committee members, all lay and scientific members of the MSAG and other ALZ scientific research review committees, and other volunteers, including researchers who have volunteered to review Award proposals (collectively, "Covered Persons").

2. Definition of Award Material. "Award Material" means all non-public written business, financial, technical and scientific information relating to the Applicant and submitted by the Applicant to ALZ for consideration of an Award, including but not limited to, samples of materials, solutions, scientific protocols, plans for further developments, marketing strategies and financial projections.

3. Nondisclosure of Award Material. For a period of three (3) years following receipt of any Award Material (unless otherwise determined by ALZ in individual cases), each Covered Person agrees not to disclose to any person outside ALZ or its affiliates (including for these purposes chapters and international affiliates) any Award Material furnished by an Applicant, except as provided below. Each Covered Person agrees that they will utilize the Award Material only for the purpose of evaluating the Applicant's application for a grant from ALZ and for no other purpose. Notwithstanding the foregoing, a Covered Person may disclose the Award Material: (i) to employees, professional advisors, volunteer scientists and other Covered Persons asked to review the Application, consultants and agents of ALZ who have a need to know and who have

been informed of this Policy on Confidentiality, or (ii) to the extent required by a court order or by law. Each Covered Person shall use the same degree of care, but not less than a reasonable degree of care, that they use to protect ALZ's own most highly confidential information to prevent any unauthorized or inadvertent disclosure of Award Material.

Any individual having question(s) concerning this policy or its applicability in each situation(s) should address those questions(s) to the appropriate ALZ staff person.

4. Return of Award Material. Each Covered Person agrees to return to the Review Panel Committee Chairperson or the MSAG Chairperson, as the case may be, all tangible materials incorporating Award Material made available or supplied to such Covered Person and all copies and reproductions thereof upon request of the Review Panel Committee Chairperson or the MSAG Chairperson, as the case may be, or the Applicant.

5. Implementation. Each Covered Person shall execute a written statement provided by ALZ stating that such Covered Person has read this Policy on Confidentiality, understands its terms and agrees to comply with the provisions hereof so long as he/she is a Covered Person. (As noted above, with respect to employees, each employee shall execute a written statement provided by ALZ stating that such employee has read the Employee Handbook, including, without limitation its confidentiality provisions, understands its terms and agrees to comply with the provisions thereof.) Such written statements shall be signed by an individual upon their appointment or other act in their being a Covered Person, and periodically thereafter at such times as ALZ determines appropriate.

#### POLICY AGAINST THE USE OF ARTIFICIAL INTELLIGENCE TOOLS IN THE PEER REVIEW PROCESS

No Covered Persons shall disclose, input, or transmit any Award Material received from ALZ to generative artificial intelligence (AI), large language models (LLMs), and other natural language processing programs, websites, or other applications. Using such AI tools for any purpose related to an Award, including, without limitation, to analyze Award Materials or generate text directly incorporated into a critique of an Award, is strictly prohibited.

#### CERTIFICATION REGARDING CONFLICTS OF INTEREST AND CONFIDENTIALITY OF INFORMATION AND USE OF ARTIFICIAL INTELLIGENCE TOOLS

I have read and understand the above Policy on Conflicts of Interest and agree to abide by the same during all times that I am a Covered Person, as defined in the Policy.

I have read and understand the above Policy on Confidential Information and agree to abide by same, and I fully understand the confidential nature of the application evaluation and review group discussions related and agree (1) to return all Award Materials; (2) not to discuss, at any time, the Award Materials or the review proceedings with any individual except the official(s) in charge of the review; and (3) to refer to all inquiries made of me concerning any aspect of the review proceedings to the official(s) in charge of the review.

I have read and understand the above Policy Against the Use of Artificial Intelligence Tools in the Peer Review Process and agree to abide by same during all times that I am a Covered Person, as defined in the Policy.

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Our Commitment to Transparency: The Alzheimer's Association<sup>®</sup> is dedicated to the transparent sharing of financial information, as well as information about our partnerships with companies, organizations and individuals. Learn more at [alz.org/transparency](https://alz.org/transparency).

This document was last reviewed in Dec. 2025.