



Financial and Organizational Conflict of Interest Policy

I. PURPOSE, SCOPE, AND APPLICATION

This Financial and Organizational Conflict of Interest Policy (this “Policy”) has been issued by Occidental Petroleum Corporation (“Oxy”) in accordance with the Interim Conflict of Interest Policy for Financial Assistance issued by the United States Department of Energy (“DOE”), effective on June 18, 2022, (“DOE Interim COI Policy”). **Please note that DOE is expected at some future date to issue a final policy, which may result in updates and modifications to this Policy.** All Investigators, and in some cases other individuals, are subject to specific requirements regarding the disclosure and management of conflicts of interest with regard to DOE-sponsored research in order to ensure that research will be conducted free of bias resulting from Investigator Financial Conflicts of Interest.

The DOE Interim COI Policy requires Oxy to maintain a written policy on conflict of interest disclosure as a condition for receiving DOE awards. Therefore, Oxy has established this Policy to require disclosure, and identification and management, of financial conflicts of interest for all Investigators supported by DOE research awards. This Policy will also apply when Oxy is a Subrecipient, Subcontractor, or Vendor on a DOE-sponsored award held by another non-federal entity, with the exception of those from the Office of Indian Energy and Phase I SBIR/STTR applications and financial assistance awards.

This Policy only applies to projects that use DOE funding. Specifically, this Policy applies to all DOE Contract, Grant, Cooperative Agreement, or Other Transaction Authority (“OTA”) vehicles awarded on or after June 18, 2022, unless specific written guidance from the Oxy Legal Department provides otherwise.

At its core, this Policy relies upon candid disclosures from individuals involved in DOE-funded research and other programs. As with every United States Government-funded grant, contract, or other program, a range of laws and regulations cover individuals and for-and non-profit entities involved in these programs. Individuals who are required to make disclosures under this Policy will be required to certify that each disclosure and updated disclosure is true, complete, and accurate.

Note that Individual DOE programs may impose different or additional conflict of interest requirements, including, for example, different reporting periods or definitions. Any such program-specific deviation will be added to this Policy on a program-specific addendum.

II. DEFINITIONS

Designated Official means the Oxy Chief Compliance Officer, or his or her designee, who will ensure compliance with this Policy and the DOE Interim COI Policy. The Designated Official will be responsible for soliciting and reviewing disclosures of significant financial interests from

each Investigator who is planning to participate in, or is participating in, the DOE-funded research in addition to significant financial interest disclosures from any other Oxy employee.

Entity Responsibilities means an Investigator's professional responsibilities on behalf of or as an employee of Oxy, which may include, but is not limited to: responsibility for the purpose, design, conduct, or reporting of a project funded by DOE or proposed for funding by DOE research; research; data analytics; or technical research consultation.

Financial Interest means anything of monetary value, regardless of whether or not the value is readily ascertainable.

Financial Conflict of Interest (FCOI) means a situation in which an Investigator or the Investigator's spouse, domestic partner, or dependent children has a Significant Financial Interest or financial relationship that could directly and significantly affect the design, conduct, reporting or funding of a DOE project.

Examples of FCOIs include, **but are not limited to**, the following:

1. Investigator (and/or an Investigator's spouse, domestic partner, and/or dependent children) entering into a paid consultancy with an outside entity that has an interest in the Investigator's ongoing research;
2. Investigator (and/or an investigator's spouse, domestic partner, and/or dependent children) receiving royalties or non-royalty payments related to ongoing research; and
3. Investigator (and/or an investigator's spouse, domestic partner, and/or dependent children) having an equity interest (e.g., stocks, stock options, warrants) related to ongoing research.

Investigator means the Principal Investigator (PI) and any other person, regardless of title or position, who is responsible for the purpose, design, conduct, or reporting of a project funded by DOE or proposed for funding by DOE. This may include, for example, collaborators or consultants.

Note that DOE program offices have the discretion to expand the definition to also include any person who participates in the purpose, design, conduct, or reporting of a project funded by DOE or proposed for funding by DOE. Such expansion will be specified in the applicable funding opportunity announcement and/or terms and conditions of the financial assistance award.

Organizational Conflict of Interest means a situation where because of relationships with a parent company, affiliate, or subsidiary organization, the non-Federal entity is unable or appears to be unable to be impartial in conducting a procurement action involving a related organization.

Principal Investigator means an Investigator (normally but not always formally designated) who has primary responsibility for the scientific and technical conduct, reporting, fiscal and programmatic administration of a sponsored project, or the functional equivalent, regardless of title.

Project means the interdependent activities funded wholly or in part under the DOE financial assistance award. A project has a defined start and end point with objectives described in an application or in an approved scope that, when attained, signify completion and achievement of a specific goal, and creation of a unique product, service, or result. For awards that include recipient cost share as part of the approved budget, activities funded with that recipient cost share are included.

Senior/key personnel means the Principal Investigator and any other person who significantly influences the design, conduct, or reporting of a project funded under a DOE award; and any other person identified as senior/key personnel by Oxy in the relevant application for financial assistance, approved budget, progress report, or any other report submitted to the DOE by Oxy under this Policy.

Significant Financial Interest (SFI) means:

1. A financial interest consisting of one or more of the following interests of an Investigator (and/or of the Investigator's spouse, domestic partner, and/or dependent children) that reasonably appears to be related to the Investigator's Entity Responsibilities:
 - a. With regard to any publicly traded entity, a significant financial interest exists if the value of any remuneration received from the entity in the twelve months preceding the disclosure and the value of any equity interest in the entity as of the date of the disclosure, when aggregated, exceeds \$5,000. For purposes of this definition, remuneration includes salary and any payment for services not otherwise identified as salary (e.g., consulting fees, honoraria, paid authorship). Equity interests include any stock, stock option, or other ownership interest, as determined through reference to public prices or other reasonable measures of fair market value.
 - b. Regarding any non-publicly traded entity, a significant financial interest exists if the value of any remuneration received from the entity in the twelve months preceding the disclosure, when aggregated, exceeds \$5,000, or when the individual (and/or the Investigator's spouse, domestic partner, and/or dependent children) holds any equity interest (e.g., stock, stock option, or other ownership interest); or
 - c. Intellectual property rights and interests (e.g., patents, copyrights), upon receipt of income related to such rights and interests.
2. Investigators must also disclose any reimbursed or sponsored travel related to an Investigator's Entity Responsibilities, including that which is paid on behalf of the Investigator so that the exact monetary value may not be readily available. Examples of travel costs include but are not limited to: costs related to lodging, meals, and transportation, including airfare, rental car, gas, or taxis/Ubers.

Sponsored or reimbursed travel may be disclosed:

- a. Prospectively, listing all anticipated travel (including information about the purpose of the trip, the identity of the sponsor/organizer, the destination, and the duration of the trip, as well as any other information that may be required by the Designated Official)

for the twelve (12) month period following the filing of the Investigator's annual disclosure form; and/or

- b. Within thirty (30) days of the occurrence of travel that either was not listed on the prospective annual travel report pursuant to paragraph a) or that significantly varied in the threshold reporting details from what was listed in the prospective report.
3. The term "significant financial interest" does not include the following types of financial interests:
- a. Salary, royalties, or other remuneration paid by Oxy to the Investigator if the Investigator is currently employed or otherwise appointed by Oxy, including intellectual property rights assigned to Oxy and agreements to share in the royalties related to those rights;
 - b. Any ownership interest in Oxy held by the Investigator;
 - c. Income from investment vehicles, such as mutual funds and retirement accounts, as long as the Investigator does not directly control the investment decisions made in these vehicles;
 - d. Income from seminars, lectures, or teaching engagements sponsored by a federal, state, or local agency, an Institution of higher education, an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education;
 - e. Income from service on advisory committees or review panels for a federal, state, or local government agency, an Institution of higher education (as defined in 20 U.S.C. § 1001(a)), an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education; or
 - f. Travel by an Investigator that is reimbursed or sponsored by a federal, state, or local government agency, an Institution of higher education (as defined in 20 U.S.C. § 1001(a)), an academic teaching hospital, a medical center, or a research institute that is affiliated with an Institution of higher education.

Subrecipient means an entity, usually but not limited to non-Federal entities, that receives a subaward from a pass-through entity to carry out part of a Federal award, but does not include an individual that is a beneficiary of such award. A Subrecipient may also be a recipient of other Federal awards directly from a Federal awarding agency.

III. DISCLOSURE OF SIGNIFICANT FINANCIAL INTERESTS

Who Must Make a Disclosure: All individuals who meet the definition of "Investigator," as defined above, should complete a Significant Financial Interest ("SFI") Disclosure. This includes,

for example, the Project Director, Principal Investigators, Co-Investigators, Study Coordinators, study staff, consultants, etc.

What Must Be Disclosed: All significant financial interests, as defined above, **including significant financial interests of a spouse, domestic partner, and/or dependent children.**

When Must an SFI Disclosure Be Made: SFI Disclosures should be completed no later than the time of application for the DOE award, or when a new Investigator first becomes engaged in the applicable study. Disclosures must be updated at least annually. New conflicts should be reported within 30 days of being identified by submitting a new SFI Disclosure.

What Time Period Does the Disclosure Cover: The obligation to make such disclosures applies to circumstances arising for the duration of the applicable award, the preceding 12 months prior to completing the SFI Disclosure, and until the project is completed.

Examples of Interests that Should be Disclosed: All relationships with commercial entities, other than Oxy, whose products/services are being used/tested or are in direct competition with those being used/tested should be disclosed to Oxy, including but not limited to:

- Ownership of stock, equity, or other financial interest in a company/entity which has products that might be used in or benefit from or be harmed by the results of the study;
- Employment, office, or directorship in any company/entity involved or potentially involved with the study;
- Personal compensation from any company/entity involved or potentially involved with the study;
- Involvement with grants, contracts, research, training, or other support (restricted or unrestricted) from any company/entity involved or potentially involved with the study;
- Travel grants to attend educational symposia provided by any company/entity involved or potentially involved with the study. This includes serving in one of the aforementioned consulting/advisory arrangements;
- Intellectual property rights (e.g., copyright, patent, trademark) related to the activities of the study; and
- Relationship with a company/entity that may affect academic advancement or status, such as sponsorship of an endowed chair or establishment of a fund for use by the study investigator.

All of the above applies to companies/entities being studied as well as those in direct competition with the companies/entities being studied as defined above. **Note that this is not a complete list of what must be disclosed.**

Certification Requirement: Each disclosure and updated disclosure must be signed and dated by the relevant Investigator, and include a statement that reads:

I understand that this Disclosure is required to obtain funding from the U.S. Government. I, [Full Name and Title], certify to the best of my knowledge and belief that the information contained in this Disclosure Statement is true, complete, and accurate. I understand that any false, fictitious, or fraudulent information, misrepresentations, half-truths, or omissions of any material fact, may subject me to criminal, civil or administrative penalties for fraud, false statements, false claims, or otherwise. (18 U.S.C. §§ 1001 and 287, and 31 U.S.C. 3729-3730 and 3801-3812). I further understand and agree that (1) the statements and representations made herein are material to U.S. Government's funding decision, and (2) I have a responsibility to update the disclosures during the period of performance of the award should circumstances change which impact the responses provided above.

IV. FCOI PROCEDURES

Review of Disclosures

1. Oxy will identify a Designated Official to solicit and review SFI Disclosures.
2. The individual acting as the Principal Investigator or Project Director for any given project should provide a list of individuals who meet the definition of "Investigator" within the required disclosure timeline to the Designated Official.
3. SFI Disclosures for all Investigators in the relevant studies should be maintained by the Designated Official.
4. Once submitted, SFI Disclosures will be reviewed by the Designated Official to determine whether a Financial Conflict of Interest (FCOI), as defined above, exists. If necessary, the Designated Official will obtain additional information from the Investigator and other individuals to help determine whether the SFI disclosed is related to a proposed or existing sponsored project or program.
5. An FCOI exists when the Designated Official reasonably determines that the significant financial interest in question could directly and significantly affect the purpose, design, conduct, or reporting of a DOE-funded project. If an FCOI is identified, then the Designated Official will determine whether the project can be undertaken.

Management of FCOIs

1. If an FCOI is identified, one or more approaches to the management of the FCOI may be exercised at the discretion of Oxy, decided on an individual basis according to the policies and procedures of Oxy. The action plan may include one or all of the following, as deemed appropriate:
 - Public disclosure of relevant significant financial interests (e.g., when presenting or publishing the project);

- Appointment of an independent monitor or oversight committee capable of taking measures to protect the purpose, design, conduct, and reporting of the project against bias resulting from the financial conflict of interest;
 - Change of personnel or personnel responsibilities, or disqualification of personnel from participation in all or a portion of the project;
 - Reduction or elimination of the financial interest;
 - Modification of the project plan;
 - Severance of the relationships/activities that create actual or potential FCOI; and/or
 - For research involving human subjects, disclosure of financial conflicts of interest directly to participants.
2. When an Investigator who is new to the project discloses a significant financial interest or an existing Investigator discloses a new significant financial interest, the Designated Official shall review the disclosure within 60 days and determine whether it is related to the DOE-funded research, determine whether an FCOI exists, and if so, implement, at a minimum, an interim action plan that shall specify the actions that have been, and will be, taken to manage the FCOI.
 3. If a significant financial interest is not disclosed or reviewed in a timely manner, the Designated Official will review the SFI within 60 days and determine if it is related to the DOE-funded research, determine whether an FCOI exists, and if so, implement, at minimum, an interim action plan that shall specify the actions that have been and will be taken to manage the FCOI going forward.

In addition, within 120 days of the determination of non-compliance, the Designated Official will complete a Retrospective Review of the Investigator's activities and the DOE-funded project to determine whether any project activity, or a portion thereof, conducted during the time period of noncompliance, was biased in the purpose, design, conduct, or reporting of such project.

4. Retrospective review: Oxy will document the retrospective review, and will produce a report that includes the following:
 - DOE award number;
 - Project title;
 - Project Director (PD)/Principal Investigator (PI) or contact PD/PI if a multiple PD/PI model is used;
 - Name of the Investigator with the FCOI;
 - Name of the entity with which the Investigator has a financial conflict of interest;
 - Reason(s) for the retrospective review;

- Detailed methodology used for the retrospective review (e.g., methodology of the review process, composition of the review panel, documents reviewed);
 - Findings of the review; and
 - Conclusions of the review.
5. Based on the results of the Retrospective Review, Oxy will update its previously submitted FCOI report, where appropriate, identifying the actions that have been taken to manage the FCOI going forward.
 6. Mitigation Report: If the Retrospective Review determines the FCOI biased the relevant project, Oxy will notify the DOE program office promptly and submit a Mitigation Report. The Mitigation Report must include, at a minimum:
 - The key elements documented in the Retrospective Review described above;
 - A description of the impact of the bias on the project; and
 - Oxy's plan of action or actions to eliminate or mitigate the effect of the bias (e.g., impact on the project; extent of harm done, including any qualitative and quantitative data to support any actual or future harm; analysis of whether the project is salvageable).
 7. Oxy will monitor Investigator compliance with disclosure requirements and relevant management plans on an ongoing basis until completion of the DOE award.

Investigator Non-Compliance and Enforcement:

Failure on the part of an Investigator to comply with this Policy will result in disciplinary action and/or sanctions which may include formal reprimand, non-renewal/termination of employment or affiliation, additional training requirements, additional supervision, closing existing research or denying future research by the Investigator, and/or any other enforcement action mandated by the applicable funding agency or Oxy.

If the retrospective review described in the previous section finds that the Investigator knew, or should have known, about the FCOI related to his/her Entity Responsibilities, but failed to disclose in compliance with this Policy, the Investigator may be subject to disciplinary or other action as discussed above.

If DOE determines that DOE-funded research was impacted by an Investigator with an FCOI that was not managed or reported as required by this Policy and Federal regulation, DOE may take a variety of remedial steps, including requiring Oxy and the Investigator to disclose the Financial Conflict of Interest in each public presentation of the results of the research and to request an addendum to previously published presentations.

Confidentiality:

Financial and other information disclosed in compliance with this Policy will be kept confidential and disclosed only on a need-to-know basis as required to perform appropriate review and evaluation required by this Policy, except in the case of required public accessibility of identified financial conflicts of interest or as otherwise required by law.

Subrecipients:

For DOE-funded projects that involves subcontractors, subgrantees or subawardees (collectively “Subrecipients”) at other non-federal entities, Oxy requires a written agreement that includes terms that establish whether this Policy or the Subrecipient’s FCOI policy will apply to subrecipient Investigators.

If the parties determine that the Subrecipient’s Investigators must comply with the Subrecipient’s FCOI policy, the following will apply:

- The Subrecipient shall certify as part of the agreement referenced above that its FCOI policy complies with the DOE Interim COI Policy. If the Subrecipient cannot provide such certification, the agreement shall state that Subrecipient Investigators are subject to this Policy (Oxy’s Financial and Organizational Conflict of Interest Policy) for disclosing financial conflicts of interest.
- The agreement referenced above shall specify time period(s) for the Subrecipient to report all identified financial conflicts of interest to Oxy. Such time period(s) shall be sufficient to enable Oxy to provide timely FCOI reports, as necessary, to DOE.
- The Subrecipient shall make its DOE-compliant FCOI policy available via a publicly accessible website. If the Subrecipient does not have any current presence on a publicly accessible website (and only in those cases), the Subrecipient shall make its written FCOI policy available to any requestor within five business days of a request.

Alternatively, if the Subrecipient’s Investigators must comply with this Policy, the agreement referenced above shall specify time period(s) for the Subrecipient to submit all Investigator SFI disclosures to Oxy. Such time period(s) shall be sufficient to enable Oxy to comply timely with its review, management, and reporting obligations under the DOE Interim COI Policy and this Policy.

A Subrecipient’s failure to promptly comply with this Policy will be considered grounds for immediate termination by Oxy of any applicable subcontract or subaward.

V. FCOI REPORTING REQUIREMENTS

Reporting:

1. **Report of Unmanageable FCOIs:** Prior to Oxy's expenditure of any funds under a DOE-funded project, Oxy shall provide to the DOE program office an FCOI report regarding any Investigator's unmanaged or unmanageable FCOIs. Oxy will also provide an FCOI report within 60 calendar days from the date of a new FCOI being identified that is determined to be unmanageable.
2. **Detailed FCOI Report:** Where required by a specific DOE program office, Oxy will provide, in addition to the Report of Unmanageable FCOIs described above, an FCOI report and supporting documentation that lists any Investigator FCOIs, regardless of whether the FCOI has been managed, mitigated, or eliminated.¹ This additional information will also be provided prior to the expenditure of any funds under the relevant DOE-funded project. Where a program office requires a more detailed FCOI report, Oxy will also provide an updated FCOI report within 60 days of: when a new SFI disclosure is determined to be an FCOI; when a new Investigator with an identified FCOI becomes engaged in the project; or when Oxy identifies a FCOI not previously disclosed.
3. The reports described above shall include:
 - DOE award number;
 - PI or Contact PI if a multiple PI model is used;
 - Name of the Investigator with the financial conflict of interest;
 - Name of the entity with which the Investigator has a financial conflict of interest;
 - Nature of any applicable financial interest (e.g., equity, consulting fee, travel reimbursement, honorarium) and/or applicable external relationships or activities;
 - Value of any applicable financial interest (dollar ranges are permissible: \$0 - \$4,999; \$5,000-\$9,999; \$10,000-\$19,999; amounts between \$20,000-\$100,000 by increments of \$20,000; amounts above \$100,000 by increments of \$50,000), or a statement that the interest is one whose value cannot be readily determined through reference to public prices or other reasonable measures of fair market value;

¹ There is no requirement to provide or disclose information regarding an FCOI where it has been eliminated (for instance, an Investigator who holds an equity position in an entity that creates an FCOI sells that equity interest) and that elimination occurs prior to the expenditure of any federal funding with regard to the relevant project.

- A description of how the financial interest relates to the project funded under a DOE award and the basis for Oxy's determination that there is a conflict with such project; and
 - Where a DOE program office requires Oxy to include all Investigator FCOIs – including managed and unmanaged/unmanageable FCOIs – in its FCOI reports, a description of the key elements of Oxy's FCOI management plan, including:
 - (A) Role and principal duties of the conflicted Investigator in the project;
 - (B) Conditions of the management plan;
 - (C) How the management plan is designed to safeguard objectivity in the project;
 - (D) Confirmation of the Investigator's agreement to the management plan;
 - (E) How the management plan will be monitored to ensure Investigator compliance; and
 - (F) Other information as needed.
4. For any FCOI previously reported, Oxy shall provide DOE with an annual FCOI report that addresses the status of the FCOI previously reported, and if applicable, any changes to the management plan, for the duration of the award. The annual FCOI report shall specify whether the FCOI is still being managed or if it remains unmanaged/unmanageable. Alternatively, where appropriate Oxy will explain why the FCOI previously reported no longer exists.

VI. MISCELLANEOUS FCOI REQUIREMENTS

Training Requirements:

Investigators must complete FCOI training prior to engaging in research related to any DOE-funded project and at least every four years thereafter. Training must also be completed as soon as reasonably possible under the following circumstances:

- This Policy changes in a manner that affects Investigator requirements;
- An Investigator is new to a Subrecipient and will be working on a DOE-funded project; and
- An Investigator is found to be noncompliant with this Policy or their approved FCOI management plan.

Following the completion of training, Investigators must acknowledge that they are in receipt of this Policy and aware of the DOE Interim COI Policy on which it is based, and will abide by its terms.

Records:

Oxy will maintain all records related to the implementation of this Policy for at least three years after:

- The date of creation;
- The date of termination or completion of a research award or contract;
- The submission of the final expenditures report; or
- The date of final resolution of any investigation, audit, or similar action involving the records.

Public Accessibility:

This Policy will be posted on Oxy's public website. In addition, information concerning identified FCOIs (whether managed or unmanaged) held by Senior/key personnel, as described above, will be made available to requestors via an email response within five business days from when Oxy receives the request. This information may be requested by emailing DOE_COI@oxy.com.

The written response will include:

- Senior/key personnel name;
- Senior/key personnel's title and role in the project;
- Name of the entity in which the FCOI is held;
- Nature of the FCOI; and
- Approximate dollar value of the FCOI or a statement that the value cannot be readily determined.

This information will remain available for three years from the date the information was most recently updated.

Information that Oxy posts on its website regarding financial conflicts of interest will be updated at least annually, and within 60 days of Oxy learning of any new FCOI of Senior/key personnel. Oxy's website will note that the FCOI information on this page is current as of the date listed on the webpage. If Oxy responds to written requests, Oxy will note in its written response 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 sixty days of Oxy's identification of a new FCOI, which should be requested subsequently by the requestor.

VII. ORGANIZATIONAL CONFLICTS OF INTEREST

DOE requires Oxy to identify, disclose, and if necessary, mitigate any actual or potential Organizational Conflict of Interest ("OCI"). An OCI occurs where, because of relationships with

a parent company, affiliate, or subsidiary organization, Oxy is unable **or appears to be unable** to be impartial in conducting a procurement action involving a related organization.

Examples of OCIs include:

- Oxy has an unfair competitive advantage in competing for a DOE award, such as access to non-public and/or competitive information (for example, access to DOE grant evaluation criteria that have not been made public);
- Oxy has a role in creating biased or unfair “ground rules” (for example, if Oxy provides grant evaluation criteria to DOE that are written to favor an Oxy technical solution); or
- Any other instance where Oxy’s objectivity is impaired for reasons that have not been disclosed to DOE (for example, if Oxy held an undisclosed interest in a company that would benefit from a technical recommendation Oxy made to DOE).

All Oxy personnel are required under this Policy to promptly notify the Designated Official if they believe an actual or potential OCI exists.

If the Designated Official determines an actual or potential OCI exists, then Oxy will promptly disclose in writing the actual or potential OCI to the DOE program office. The disclosure must be provided to DOE in an application for financial assistance or prior to engaging in a procurement or transaction using DOE funds with a parent, affiliate, or subsidiary organization (that is not a state, local government, or Indian tribe). The disclosure must include the following:

- The name, address, and website (as applicable) of the entity that presents a potential or actual organizational conflict of interest;
- The relationship between the non-Federal entity and the entity at issue;
- The nature of the anticipated procurement or other transaction with the parent, affiliate, or subsidiary organization;
- The anticipated value of the procurement or other transaction;
- The basis for making the procurement or other transaction with a parent, affiliate, or subsidiary organization;
- The basis for Oxy’s determination regarding the existence of an organizational conflict of interest; and
- How Oxy will avoid, neutralize, or mitigate the organizational conflict of interest.

Where there is an OCI that cannot be avoided, neutralized, or mitigated, Oxy will procure goods and services from other sources when using DOE funds.

Approved By: Chief Compliance Officer

Date: September 18, 2023