

## OVERALL DOE CONFLICT OF INTEREST POLICY

### Introduction

Ascend Elements Inc. (the “Company” or the “Recipient”) has prepared this Conflict of Interest (“COI”) Policy & Plan (the “DOE COI Policy”) to identify and mitigate any potential, actual, or perceived financial or OCI that might arise from work to be performed by the Company under all projects for which financial assistance funding is sought or received from the U.S. Department of Energy (“DOE” or the “Agency”).

Under DOE’s Interim COI Policy, the Company must certify that it: (1) has in effect an up-to-date, written, and enforced administrative process to identify and manage conflicts of interest with respect to all projects for which financial assistance funding is sought or received from DOE; (2) shall promote and enforce Investigator compliance with the DOE Interim COI Policy’s requirements including those pertaining to disclosure of SFIs (“SFIs”); (3) shall manage financial conflicts of interest (“FCOIs”) and provide initial and ongoing FCOI reports to DOE; (4) agrees to make information available, promptly upon request, to DOE relating to any Investigator disclosure of financial interests and the Recipient’s review of, and response to, such disclosure, whether or not the disclosure resulted in the Recipient’s determination of a FCOI; and (5) shall fully comply with the requirements of the DOE Interim COI Policy.

### Purpose of Policy

The purpose of the Company’s DOE COI Policy is to provide an up-to-date, written, and enforced administrative process within the Company to identify and manage any potential, perceived, or actual financial and OCIs with respect to all projects for which financial assistance funding is sought or received from DOE in compliance with DOE’s Interim COI Policy.<sup>1</sup>

Additionally, the DOE COI Policy seeks to:

- Provide a Company administrative process to identify, manage, resolve, and report (if applicable) any potential, perceived, or actual FCOI or organizational conflicts of interest (“OCI”).
- Prevent potential or perceived FCOIs or OCIs and ensure timely identification of all potential COI situations arising in connection with a project that is wholly funded or partially funded under the DOE financial assistance award.

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<sup>1</sup> The Company’s COI Policy does not apply to Office of Indian Energy and Phase 1 Small Business Innovation Research (“SBIR”)/Small Business Technology Transfer (“STTR”) funding opportunity announcements and financial assistance awards, which are specifically exempted from DOE’s Interim COI Policy. See U.S. Dep’t of Eng. Interim Policy at pdf 1; *id.* at Appx. 1, § II.



- Ensure immediate and appropriate action in the event of a breach of this Policy, up to and including termination of Company and/or subrecipient employees that intentionally do not comply with this COI Policy.
- Establish training programs geared to educate Company employees and/or Investigators on the specific COI concerns and prevent a COI in accordance with the Policy.
- Ensure Investigators meet all requirements to disclose any SFIs to ensure any perceived, possible, or actual FCOI are identified, mitigated, and/or reported (as required).

## **Policy**

It is the policy of the Company that specific policies and procedures in compliance with the DOE Interim Conflict of Interest Policy are adopted for each project for which the Company seeks or receives financial assistance funding from DOE. Prior to the execution of a DOE funding agreement), the Company will adopt the specific policies and procedures outlined for each proposed project.

*Last update June 2025*