

## Southern Company Conflicts of Interest – Department of Energy (DOE) Financial Assistance Awards Policy



**Policy Statement:** This policy sets forth rules for individuals applying for or receiving DOE funding under a financial assistance award (e.g., a grant, cooperative agreement, or technology investment agreement). This policy works in conjunction with the Conflicts of Interest – Department of Energy (DOE) Financial Assistance Awards Procedure to provide for the appropriate management of financial and organizational conflicts of interest for projects wholly or partially funded by DOE.

**Policy Scope:** This policy applies to all individuals who apply for or receive a DOE financial assistance award. This policy applies to all Investigators of projects funded under a DOE financial assistance award.

### Policy Definitions:

**Investigator:** is 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. DOE program offices have the discretion to expand the definition to include also any person who participates in the purpose, design, conduct, or reporting of 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.

**Significant Financial Interests:** One or more of the following financial interests of the Investigator (and those of the Investigator's spouse and dependent children):

- (1) value of remuneration (including, but not limited to, salary, consulting fees, honoraria, equity interests, and other ownership interests) received from entities other than Southern Company, its subsidiaries, or its affiliates which aggregately exceeds \$5,000;
- (2) income from intellectual property rights and interests,
- (3) certain reimbursed or sponsored travel.

### Policy Requirements:

Any individual who is an Investigator on a project funded by DOE or proposed for funding by DOE must disclose the following information in accordance with the Conflicts of Interest – Department of Energy (DOE) Financial Assistance Awards Procedure:

- (1) any Significant Financial Interest no later than the time of application for the DOE award
- (2) an updated disclosure of Significant Financial Interests at least annually during the period of the award
- (3) an updated disclosure of Significant Financial Interest within thirty days of any changes or discovery (e.g. through purchase, marriage, or inheritance) of a new significant financial interest

**Policy Enforcement and Consequences:** All employees are responsible for following this policy. Managers are responsible for communicating and consistently enforcing this policy. Violation of this policy will lead to management action which could include discipline up to and including termination.