

Research Integrity Policy

Policy Statement

An absolute commitment to research integrity lies at the core of EPRI's reputation. This commitment is necessary to earning the sustained trust of the public, EPRI's members, funders and other collaborators, and all the other stakeholders who rely on and benefit from EPRI's research. All EPRI employees, Resident Researchers and contractors must maintain the integrity, objectivity, accuracy and reliability of research conducted by, on behalf of, or for EPRI as set forth in this policy.

Maintaining the Integrity of Research

EPRI prohibits Research Misconduct in proposing, performing, or reviewing research, reporting research results, or maintaining research records, any data or results that embody the facts resulting from the Institute's activities, including, but not limited to, EPRI reports and software, research proposals, laboratory records, progress reports, abstracts, presentations, internal reports, and journal articles. "Research Misconduct" includes:

- Fabrication — making up data or results and recording or reporting them.
- Falsification — manipulating research materials, equipment, or processes, or changing or omitting data or results such that the research is not accurately represented in the research record.
- Plagiarism — appropriating another person's ideas, processes, results, or words without giving appropriate credit.

Research Misconduct does not include honest error or differences of opinion.

EPRI expects its employees, Resident Researchers and contractors to help prevent, detect, report and remediate Research Misconduct, and support the company in conducting inquiries and Investigations as set forth below.

Inquiries and Investigations into Research Misconduct

EPRI will conduct Inquiries and Investigations (defined further below) into allegations or suggestions of Research Misconduct as described below.

- Inquiry — information gathering and initial fact-finding to determine whether an allegation or apparent instance of misconduct warrants an Investigation.
- Investigation — formal examination and evaluation of the relevant facts, including the development a complete factual record and an examination of such record leading to either a finding of Research Misconduct and an identification of appropriate remedies or a determination that no further action is warranted.

An Investigation may lead to a finding of Research Misconduct, i.e., a determination, based on a preponderance of the evidence, that Research Misconduct has occurred with a conclusion that there has been a significant departure from accepted practices of the relevant research community and that it was knowingly, intentionally, or recklessly committed. If such a finding is made, EPRI will then conduct an adjudication headed by a responsible officer who was not involved in the Inquiry or Investigation and is

separated organizationally from the officer or group which conducted the Investigation. The adjudication will include a review of the investigative record and, as warranted, a determination of appropriate corrective actions and sanctions. Employees who engage in Research Misconduct or condone Research Misconduct by others will be subject to disciplinary action, up to and including termination.

If the need arises to perform an Inquiry or Investigation, EPRI will follow these principles:

- **Reporting:** All EPRI employees, Resident Researchers and contractors have an obligation to report any suspected or known violation of this policy.
- **Non-Retaliation:** EPRI will not tolerate any form of retaliation or retribution against any person who makes a good faith report of suspected, threatened or ongoing violations of this policy.
- **Fairness:** EPRI is committed to fair and objective procedures for examining and resolving allegations of Research Misconduct and will exercise reasonable diligence to protect confidentiality for all involved in an Inquiry or Investigation until a final adjudication has been made. Any person accused or suspected of Research Misconduct will be provided timely written notice regarding substantive allegations against them, a description of the allegation and reasonable access to any evidence submitted to support the allegation or developed in response to an allegation, an opportunity to respond to the allegation and notice of any findings of Research Misconduct.
- **Process Objectivity:** EPRI will select individual(s) to inquire, investigate, and adjudicate allegations of Research Misconduct who have appropriate expertise and have no unresolved conflict of interest. The individual(s) who conducts the adjudication will not be the same individual(s) who conducted the Inquiry or Investigation, and to the extent practicable, will be selected from outside of the reporting structure in which the accused person(s) are employed. EPRI may, in its sole discretion, engage independent, outside experts to conduct any or all parts of the Research Misconduct process.
- **Timeliness:** All efforts will be made to conduct any Inquiry, Investigation or adjudication of allegations of Research Misconduct promptly, to the extent consistent with fairness, thoroughness and objectivity. Generally, an Investigation should be completed within 120 days of initiation, and adjudication should be complete within 60 days of receipt of the record of Investigation.
- **Confidentiality:** To the extent practicable and consistent with fair, thorough and objective review of allegations of Research Misconduct and applicable law and regulation, the fact of the Investigation, its subject(s) and any witnesses will be limited to those with a need-to-know.
- **Remediation:** If EPRI finds that Research Misconduct has occurred, it will assess the seriousness of the misconduct and its impact on the research completed or in process. EPRI will take all necessary corrective actions including but not limited to correcting the research record and, as appropriate, imposing restrictions, controls, or other parameters on research in process or to be conducted in the future.
- **Sanctions:** In the event of a finding of Research Misconduct EPRI will also consider whether personnel sanctions are appropriate. As noted above, employees who engage in Research Misconduct or condone Research Misconduct by others will be subject to disciplinary action, up to and including termination.

Government Funded Research

The U.S. Government has adopted regulations governing Research Misconduct committed in government-funded research programs. Those requirements may be incorporated in funding agreements between EPRI and a government agency or a private entity that has received government funding and is subcontracting to EPRI. EPRI may also be required to incorporate ("flow down") such requirements to its subcontractors. See 10 CFR part 733. EPRI Employees, Resident Researchers and Contractors working on such research are accountable for knowing, understanding and complying with all contractual terms, including those pertaining to Research Misconduct.

For questions regarding government-related research, please contact the Sr. Manager of Government Contracts.

Definitions

Fabrication -- making up data or results and recording or reporting them.

Falsification -- manipulating research materials, equipment, or processes, or changing or omitting data or results such that the research is not accurately represented in the research record.

Finding of Research Misconduct -- a determination based on a preponderance of the evidence that research misconduct has occurred. Such a finding requires a conclusion that there has been a significant departure from accepted practices of the relevant research community and that it be knowingly, intentionally, or recklessly committed.

Inquiry -- information gathering and initial fact-finding to determine whether an allegation or apparent instance of misconduct warrants an Investigation.

Investigation -- the formal examination and evaluation of the relevant facts.

Plagiarism -- the appropriation of another person's ideas, processes, results, or words without giving appropriate credit.

Research -- all basic, applied, and demonstration research in all fields of science.

Research Misconduct -- fabrication, falsification, or plagiarism in proposing, performing, or reviewing research, or in reporting research results, but does not include honest error or differences of opinion.

Research Record -- the record of all data or results that embody the facts resulting from scientists' inquiries, including, but not limited to, research proposals, laboratory records, both physical and electronic, progress reports, abstracts, theses, oral presentations, internal reports, and journal articles.

Applicability

Applicable to employees, Resident Researchers, contractors and other individuals acting on EPRI's behalf.

| Reference Information | |
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| For Questions Contact: | SVP R&D |
| Responsible Organization: | R&D |
| Last Revision/Effective Date: | 09/23/10 |

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