

EXHIBIT 2

CONFLICT OF INTEREST ACTION PLAN

Employee Name: Dr. Van Cybulski

Date of Disclosure: 10/31/2018

Position: Senior Scientist, Department: DBS

Background

Dr. Cybulski is a Senior Scientist in the Division of Biological Sciences (.9 FTE) and is responsible for research as befits his position. In addition, Dr. Cybulski is also an employee of Inimmune, Inc., a Delaware corporation (.1 FTE), whose Montana address is 1121 E. Broadway, Ste. 121, Missoula, MT 59802.

Conflict of Interest Disclosed by Employee

Conflict 1: Potential conflict of interest arising from a significant financial interest (stock options) in Inimmune, Inc, a Delaware corporation. Ref: 42 CFR Part 50 Subpart F

Action Plan:

Because of Dr. Van Anthony Cybulski's financial interests in Inimmune, Inc. there is the potential for conflicts of interest and conflicts of commitment. To provide appropriate management of the potential conflicts, Dr. Cybulski agrees to safeguards as follows:

1. On July 12, 2019, he will receive approval from the Board of Regents in accordance with Policy 407, allowing his/her participation in Inimmune, Inc. as described above.
2. He agrees he will fully complete all of his faculty and research assignments, his work for Inimmune will in no way interfere with his UM work, and he will use no university resources in the conduct of his work for Inimmune, Inc. unless it is in accordance with board of Regents Policy No. 401.2 (Faculty Consulting) and Section 12.200 of the Collective Bargaining Agreement between The University of Montana University Faculty Association and the Montana University System (hereinafter the "CBA"). Further, he will comply with Sections 12.200 and 12.400 of the CBA which requires, among other things, that faculty limit their other compensated professional activities, such as consulting, so as not to impair his educational effectiveness or otherwise interfere with his professional responsibilities to the University.
3. In his sponsored research for UM, he will allow no bias towards results which benefits Inimmune, Inc. or results which may be to the detriment of any competitors.
4. He will abide by UM's policies concerning disclosure of any intellectual property developed in connection with his work for UM. He will not reveal the results of his work nor use technology developed through his work to benefit Inimmune unless it is duly licensed in accordance with Board of Regents and UM's policies and procedures.

5. Dr. Cybulski agrees to file the annual Conflict of Interest Disclosure Statement and Certification with the Vice President for Research and Creative Scholarship. Dr. Cybulski acknowledges that UM will monitor and evaluate this plan as well as policies related to it, and, at any time should UM determine, in its sole discretion, that the plan is not sufficient to guard against actual or apparent conflicts of interest or commitment or otherwise not in the interests of UM, it may revise or terminate this agreement.

Acknowledgement and Agreement

By signing below, I acknowledge my intent to comply with the safeguards laid out in this Plan.

Signature: _____ Date: _____
Dr. Van Cybulski

By signing below, I certify that I have reviewed this conflict of interest action plan.

Signature: _____ Date: _____
Dr. Scott L. Whittenburg
Vice President for Research & Creative Scholarship

Review by Research Compliance

This Conflict of Interest Action Plan meets all the requirements of Board of Regents Policy 770: Conflicts of Interest, University of Montana Policy 703: Conflicts of Interest and Financial Disclosure, and Montana statutes regarding conflict of interest and ethical standards for state employees (§2-2-104, §2-2-105, §2-2-121, § 2-2-201, and §20-25-109, MCA), and BOR Policy 407: University System Employee Equity Interest and/or Business Participation.

Signature: _____ Date: _____
Dr. Claudia Denker-Eccles
Assistant Vice President for Research Compliance