

# Exhibit 1

## Harvard Business School

### Research Integrity Policy

Harvard Business School is committed to the intellectual honesty and integrity of research produced by its faculty, students, and research staff. All researchers are expected to uphold the integrity of the research process.

In order to protect the integrity of research at the School, allegations of research misconduct will be treated with the utmost seriousness. Research misconduct is defined as “fabrication, falsification, or plagiarism in proposing, performing, or reviewing research, or in reporting research results.

(a) Fabrication is making up data or results and recording or reporting them.

(b) Falsification is 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.

(c) Plagiarism is the appropriation of another person's ideas, processes, results, or words without giving appropriate credit.

(d) Research misconduct does not include honest error or differences of opinion.”<sup>1</sup>

Except as required by law or regulation, these “Procedures for Allegations of Faculty Research Misconduct” describe the steps to be followed when allegations are brought against faculty at the School over the integrity of journal research, books, course materials, and all other research. Student and staff misconduct is handled separately by the appropriate administrative department.

#### Procedures for Allegations of Faculty Research Misconduct

The Dean has principal responsibility for protecting the research integrity of the School and determining a proper response to allegations of misconduct in research. All allegations of misconduct in research should therefore be brought to the attention of the Dean, who will consult with the Senior Associate Dean for Research or others at the School or University to determine an appropriate course of action.

Because of variations in such factors as the type and seriousness of alleged misconduct, the course of action that will enable the Dean to fulfill his or her obligations most thoroughly and equitably may vary somewhat from case to case. Accordingly, the procedures set forth below permit flexibility and are designed to provide a framework that should enable equitable resolution of allegations of misconduct in a variety of circumstances.

It is important that whatever process the Dean determines to be appropriate is thorough, fair, and objective and should take into account the following concerns:

- Protecting the rights and reputations of the individual accused, good faith complainants, witnesses, and those charged with investigating the complaint;

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<sup>1</sup> This definition, set forth in the Public Health Service regulations concerning the conduct of research, is widely referenced throughout Harvard University.

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- Protecting from retaliation those involved in the process by the accused party or others at the University<sup>2</sup>;
- Informing the accused individual of the nature of the allegations, the evidence in support of the allegations, and the procedures to be followed.

The Dean may, depending on the nature of the allegation, attempt to resolve the matter through informal process or discussion. If the matter is not appropriate for informal resolution, the Dean may appoint an individual or a committee to investigate the allegation. An investigating committee will ordinarily include one or more members of the tenured faculty, but may also include others chosen by the Dean. The investigator or investigating committee will be responsible for investigating the facts bearing on the case, and for making a recommendation to the Dean. Faculty, staff, and students are expected to cooperate fully with any investigator.

After such proceedings and deliberations, the investigator or a designee from the investigating committee shall brief the Dean. A draft of any report by the investigating committee shall be offered to the accused party or parties for review and comment before it is finalized. Any comments supplied by the accused shall be appended to the report. If the Dean wishes for more information, he or she may request further assistance from the investigator or investigating committee or from others within and outside the Faculty.

The Dean shall decide the matter and take whatever action he or she believes justified. The decision of the Dean is final and completes the procedure. The Office of the Dean shall maintain records of any proceedings.

The Dean also has the responsibility to determine whether other parties with an interest in the alleged misconduct should be informed of the allegations or consulted in connection with the proceedings. These could include, among others:

- The President of Harvard University.
- Officers of any affiliated institutions, other private or public institutions, or agencies, in instances where these institutions have an interest in the research.<sup>3</sup>
- Deans of other Harvard faculties in instances when allegations are made against individuals holding appointments in more than one Harvard faculty. In such cases, the Deans of the respective faculties shall together determine an approach to responding to the allegation.
- Deans of other Harvard and non-Harvard faculties, in instances when allegations are also made against co-authors from other faculties.

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<sup>2</sup> Refer to Harvard University non-retaliation and whistleblowing policies.

<sup>3</sup> Harvard Business School will follow policies and procedures required by outside agencies that sponsor research when an allegation involves activities funded by or proposals submitted to those agencies.