

STANDARD POLICY/PROCEDURE
FAIRFIELD UNIVERSITY FAIRFIELD, CONN

PAGE 1 OF 3

EFFECTIVE DATE
07-01-92

NUMBER
520

AUTHORIZED BY:

SUBJECT

BUSINESS ETHICS/CONFLICTS OF INTEREST POLICY

APPROVED

Stephen P. Jakab

PURPOSE

This policy is intended to guide all employees, who in the course of their duties, make decisions relative to the University's business relationships and reputation.

SCOPE

To create a policy and belief that as a principle of sound management, all business affairs at Fairfield University be conducted with the spirit and intent of exemplary business ethics, honesty and integrity. This standard of conduct includes, but is not limited to: Business/Personal Interests, Acceptance of Gifts or other Benefits, Disclosure of Confidential Information, Contributions to Political Parties or Candidates, and Hospitality Toward Public Officials.

GENERAL

Employees may not accept, for private use, directly or through a member of his/her immediate family or otherwise, any gratuitous payment, loan, service or accommodation of value from any other party doing or seeking to do business with Fairfield University. Acceptance of excessive entertainment, travel or gifts of merchandise (cash is never permitted) of a character which reasonably might be deemed by others to affect the judgment or action of the officer or employee in the performance of his/her employment with Fairfield University would also contravene this policy. All employees shall at all times act in ways consistent with their fiduciary responsibilities to the University and shall exercise particular care to avoid any conflict of interest situations so that no detriment to the University results from conflicts between their interests, or those of others of their family, and those of the University.

If an employee believes that he or she may have a conflict of interest, the employee shall promptly and fully disclose the conflict to his/her supervisor and shall refrain from participating in any way in the matter to which the conflict relates until the question has been resolved. The information disclosed to the supervisor shall be brought to the attention of a committee consisting of the Division Heads of the University. They shall take whatever action is appropriate to resolve the concern. The committee shall then file with the President a brief memorandum describing its action.

Fairfield University recognizes and respects the individual employee's right to engage in activities outside of his or her employment which are private in nature and do not in any way conflict with or reflect poorly on the University. Management reserves the right, however, to determine when an employee's activities represent a conflict with the University's interests and to take whatever action is necessary to resolve the situation -- including terminating the employee. The list below suggests some of the types of activities that would be inconsistent with the objectives of this policy and the ethical standards of Fairfield University. This list is not intended to be totally inclusive.

A. Business/Personal Interests

1. Simultaneous employment by another firm.
2. Carrying on University business with a firm in which the employee, or a close relative of the employee, has a substantial ownership or interest.
3. Holding a substantial interest in, investing in other than stock or bond transactions, or participating in the management of, a firm to which the University makes sales or from which it makes purchases.
4. Speculating or dealing in materials, equipment, supplies, services, or property purchased by the University.

B. Gifts and Gratuities

1. Accepting any gift or cash equivalent (checks, bank deposits, etc.) from an outside organization or agency from which the University buys services, materials, equipment or supplies.
2. Borrowing money from vendors or firms, other than recognized loan institutions, from which the University buys services, materials, equipment or supplies.
3. Accepting substantial gifts or excessive entertainment from an outside organization or agency.

C. Misuse of Confidential Information

1. Participating in civic or professional organizational activities in a manner whereby confidential University information is divulged.
2. Misusing privileged information or revealing confidential data to outsiders.
3. Using one's position in the University or knowledge of its affairs for outside personal gains.

D. Contributions to Political Parties or Candidates

1. Fairfield University will not contribute to political parties or candidates for office nor will any employee directly or indirectly suggest that subordinate employees contribute to any particular party or candidate.

E. Hospitality Toward Public Officials

1. Acts of hospitality toward public officials should be of such a scale and nature as to avoid compromising the integrity or impugning the reputation of the public official or the University.

F. Other Conflicts of Interest

1. Employees must refrain from taking part in, or exerting influence in, any other transaction not outlined above, in which their own interests may conflict with the best interests of the University.

Each employee will be responsible for adhering to this policy and for reporting violations to their supervisor.

This policy is to be interpreted and applied in a manner that will best serve the interests of the University.

This policy may be changed as deemed appropriate.