



Policy Title: Code of Conduct

Category: Compliance

Policy Number: 110

Sponsor: Chief Compliance Counsel

Effective Dates: Approved by President's Cabinet on September 17, 2008 and approved by Board of Trustees on November 13, 2008 (endorsed by Faculty Senate on September 5, 2008)

INTRODUCTION AND PURPOSE. The University necessarily acts through individuals, who face decisions on a daily basis regarding the proper course of conduct while performing teaching, research, or other University business activities. The Code of Conduct is a collection of broad statements designed to provide standards for proper decision-making in everyday practice that reflects the shared obligation of the entire University community to act consistent with the law and ethics.

CANCELLATION. Compliance Policy 110 dated November 14, 2007 is cancelled.

SCOPE AND APPLICABILITY. The Code of Conduct applies to all University faculty, staff, volunteers, and others who exercise authority on behalf of or in affiliation with the University.

POLICY STATEMENTS.

All covered persons, when exercising authority on behalf of or in affiliation with the University, are required to comply with the Code of Conduct, violations of which may result in sanctions, including termination.

DEFINITIONS.

The term "*covered persons*" means all University faculty, staff, volunteers, and others who exercise authority on behalf of or in affiliation with the University.

PROCEDURES.

1. The Office of Compliance shall publish the Code of Conduct on the University website and on a brochure suitable for distribution.
2. The Office of Compliance, in coordination with the Office of Human Resources, shall communicate the Code of Conduct to new hires during employee orientation and seek from them written or electronic acknowledgement that they have read and understand the Code of Conduct.
3. The Chief Compliance Counsel shall, at least annually, communicate or coordinate the communication of the Code of Conduct to senior administration officials and others in positions of significant authority, as determined by the President, and seek from them written or electronic acknowledgement that they have read and understand the Code of Conduct.

POINTS OF CONTACT. Questions or requests seeking guidance about matters contained in the Code of Conduct may be addressed to your supervisor or to the Chief Compliance Counsel, who may be reached at 847-578-8308.

Rosalind Franklin University of Medicine and Science

CODE OF CONDUCT

Note that the term "covered persons" means University faculty, staff, volunteers, and others who exercise authority on behalf of or in affiliation with the University.

All covered persons, when exercising authority on behalf of or in affiliation with the University, are required to comply with the Code of Conduct, violations of which may result in sanctions, including termination.

Questions or requests seeking guidance about matters contained in the Code of Conduct may be addressed to your supervisor or to the Chief Compliance Counsel (847-578-8308).

I. GENERAL PROVISIONS

- I.1. Covered persons shall comply with applicable federal, state, and local laws.
- I.2. Covered persons shall perform activities with integrity, honesty, and sense of fairness.
- I.3. Covered persons shall become familiar with and act consistent with the relevant University policies and procedures.

II. CONFLICTING INTERESTS

- II.1. Covered persons shall not allow any interest to inappropriately influence their judgment or the good faith execution of their duties.
- II.2. Covered persons shall make timely disclosure to the proper authority of any interest that is or appears to be in conflict with their judgment or good faith execution of their duties.
- II.3. Any covered person who provides or is requested to provide information to a decision-maker shall contemporaneously make disclosure of any interest that is or appears to be in conflict with an accurate, unbiased, and impartial presentation of that information.
- II.4. Any covered person shall not participate as a member of a committee or board in a matter in which that covered person has an interest that is or appears to be in conflict with their judgment or good faith execution of committee or board duties.

III. FISCAL AFFAIRS

- III.1. Covered persons shall ensure any claim, bill, request, or solicitation for funds made under their authority or control is true to the best of their knowledge and belief and that it does not contain false, misleading, or otherwise inappropriate assertions.
- III.2. Covered persons shall return funds in their possession or control that were collected in error.
- III.3. Covered persons may use funds in their possession or control only in accordance with the applicable conditions associated with the funds.

IV. GOVERNMENTAL AFFAIRS

IV.1. Covered persons shall ensure that any communication to government officials or representatives is true to the best of their knowledge and belief and that it does not contain false, misleading, or otherwise inappropriate assertions.

IV.2. Covered persons shall timely respond to lawful requests of or other communications from government officials and shall not impede or obstruct the due administration of justice.

V. OFFICIAL RECORDS AND STATEMENTS

V.1. Covered persons shall ensure, to the best of their knowledge and belief, that information entered under their authority or control into an official University record is true and that it does not contain false, misleading, or otherwise inappropriate assertions.

V.2. Covered persons shall use reasonable safeguards to protect University records from loss or inappropriate alteration or destruction and shall not create, use, or destroy University records for the purposes of deception.

V.3. Covered persons shall ensure, to the best of their knowledge and belief, that any verbal, written, or other statement made under their authority or control is true and that it does not contain false, misleading, or otherwise inappropriate assertions.

V.4. Covered persons shall utilize reasonable safeguards to protect information deemed confidential from unauthorized use and disclosure and shall not use or disclose such confidential information for unauthorized purposes.

VI. USE OF UNIVERSITY TIME AND RESOURCES

VI.1. Covered persons shall efficiently utilize University time and not waste or otherwise use University time for unauthorized or inappropriate purposes.

VI.2. Covered persons shall protect, conserve, and efficiently utilize University resources and not waste or otherwise use them for unauthorized or inappropriate purposes.

VII. WORKING ENVIRONMENT

VII.1. Covered persons shall treat others fairly and with honesty, dignity, and respect.

VII.2. Covered persons shall not engage in or tolerate unlawful discrimination.

VII.3. Covered persons shall not use their positions of authority to coerce, intimidate, or improperly influence another regarding the use of their personal funds, property, or time.

VII.4. Covered persons shall follow and comply with health and safety practices and standards.

VIII. REPORTING CONCERNS AND NON-RETALIATION

VIII.1. Covered persons shall promptly report or seek guidance regarding potential, known, or suspected violations of the Code of Conduct to their supervisor, to a University official overseeing the conduct in question, or to the Office of Compliance, which may be accomplished directly or through the use of the toll-free number allowing anonymity (800-254-0460).

VIII.2. Covered persons shall cooperate in the investigation and resolution process regarding an allegation of a potential, known, or suspected violation of the Code of Conduct.

VIII.3 Covered persons shall not subject any other person to retaliation, retribution, or reprisal for making a good faith report of, seeking guidance regarding, or participating in the investigation or resolution of a potential, known, or suspected violation of the Code of Conduct.



Acknowledgement regarding the

Rosalind Franklin University of Medicine and Science
CODE OF CONDUCT

By signing below, I acknowledge that I have read and understand *The Rosalind Franklin University of Medicine and Science CODE OF CONDUCT*.

Signature

Date of Signature

Printed Name

Note: After completion of this form, please deliver to the Office of Human Resources.