

Conflict of Interest Policy

Trustees, corporate and administrative officers, faculty, staff, and other representatives of Mount St. Joseph University serve the public trust and are required to fulfill their responsibilities with care and loyalty. All decisions and actions made by the board, its executive committee, the administration, and others who serve in a fiduciary capacity, are to be made for the sole purpose of advancing the best interests of the institution and the public good. The integrity of Mount St. Joseph University must be protected at all times, and the fiduciary relationship of trustees, corporate and administrative officers, faculty, staff, and other representatives to Mount St. Joseph University must be respected in both actuality and appearance.

A conflict of interest may exist when a faculty or staff member of Mount St. Joseph University benefits, either directly, or indirectly, from his or her employment by the University except for compensation and financial benefits paid or granted by the University.

This policy is not designed to eliminate relationships and activities that may create a duality of interest. The University recognizes that faculty and staff are involved in a variety of activities outside of the University and further recognizes that many such activities bring favorable and desirable attention to the University. Not all activities, contacts, memberships, and relationships represent a conflict of interest. The purpose of this policy and disclosure form is to identify where the potential for conflict might exist and provide an opportunity for appropriate management and or elimination.

By way of further explanation, a significant interest in another entity includes, but is not necessarily limited to, service as a trustee, director, partner, or management-level employee; the actual or beneficial ownership of more than 5% of the entity; or a compensation arrangement that is dependent upon a business or financial relationship between the entity and the University;

Faculty and staff of Mount St. Joseph University are expected:

- 1) to avoid conflicts between their personal interests or other significant business interests and the interests of the University of Mount St. Joseph.
- 2) to disclose any personal interest or other significant business interest that may conflict with the interests of the University of Mount St. Joseph;
- 3) to refrain from voting or otherwise influencing a decision of Mount St. Joseph University on any matter in which such a conflict exists;
- 4) to refrain from using nonpublic or proprietary information, acquired by means of position held, for personal gain or benefit;
- 5) to disclose any gift, loan, free or discounted products or services, promise of future employment or any other item given for personal use or benefit made to secure or keep a business relationship with the University of Mount St. Joseph;

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- 6) to disclose employment either on a part time or consulting basis with other institutions of higher education (University of Mount St. Joseph adjunct faculty excluded);
- 7) to refrain from using University resources for personal interest.

The foregoing are not intended to be all encompassing; other relationships or interests that might conflict with the best interests of the University should also be disclosed and/or avoided.

Faculty and staff are required to disclose on a Conflict of Interest Disclosure Form any activities, contacts, memberships, and relationships that may represent a conflict of interest or business or financial relationships they or members of their immediate families (spouse and children, including adult children) have or propose to have with Mount St. Joseph University, either directly, or through another entity in which they have significant interest. The disclosure form is to be completed annually; an amended form must be filed promptly in the event of a material change in circumstances. All forms will be forwarded to the University's Chief Compliance & Risk Officer who will determine whether a business or financial relationship involving a faculty or staff member should be entered into or continued. The compliance officer shall provide reports as requested to the Audit/Finance Committee of the Board of Trustees and may request advice or direction from the Audit/Finance Committee as needed.

Prospective faculty and staff members shall be advised of this policy and must state their willingness to abide by it as a condition of employment.