

## **SCHREINER UNIVERSITY CONFLICT OF INTEREST POLICY**

### **Purpose**

Schreiner University expects and requires that all personnel will perform their duties in good faith and in the best interests of the University. In particular, employees must avoid activities, agreements, business investments or interests, or other situations that could be construed as either in conflict with the interests of the University or as an interference with the individual's duty to serve the University to the best of his or her ability.

### **Scope**

This policy applies to all administrators, faculty, and staff. The Vice President for Planning and Finance (VPPF) is responsible for the oversight of this policy.

### **Policy**

It is in the best interest of Schreiner University to be aware of and properly manage all conflicts of interest and appearances of a conflict of interest. This conflict of interest policy is designed to help employees of the University to identify situations that present potential conflicts of interest and to provide Schreiner University with a procedure to appropriately manage conflicts in accordance with the goals of accountability and transparency in Schreiner University's operations.

An actual or potential conflict of interest occurs when an employee's position or authority may be used to influence a University decision in a way that results in a direct or indirect personal gain for that employee or for his or her family member, friend, or associates. Examples of conflict of interest include situations where the employee, family member, friend, or associate: (1) has or appears to have any material, financial or other interest which may impair the individual's judgment in carrying out the responsibilities delegated by the University, or (2) may gain a personal benefit from the knowledge of information confidential to the University. For purposes of this policy, family is defined as spouse or domestic partner, parents, siblings, children, and if living in the same household, other relatives. An associate includes any person, organization, enterprise or trust in which the individual or members of his or her family (1) is a director, officer, employee, partner or trustee, or (2) has any material association.

Business dealings with outside firms also should not result in unusual gains for those firms and shall not result in any gains for University employees, including kickbacks, bribes, bonuses, fringe benefits, promises of employment or other windfalls designed ultimately to benefit either the outside firm, the employee(s) involved, or both.

### **Details and Employee Obligations**

- Any employee who has any influence on transactions involving University purchases, contracts, leases, or business matters must disclose the existence of any actual or potential conflict of interest to the Vice President of Planning and Finance as soon as possible through prompt and complete disclosure so that safeguards can be established to protect all parties.
- Employees should be aware that there are certain circumstances, such as during a bidding process, that a gift of any size would represent a conflict of interest. In addition, such an employee must also refrain from further participation in the transaction until such time as the actual or potential conflict can be reviewed and resolved.

- Applicable employees may be required to provide annual notification of possible situations that could cause bias or cause them to be impartial in any business transactions involving Schreiner University and/or any vendor of the University. This notification will also include possible conflict situations for an employee's family.
- Employees requesting the addition of a new vendor must disclose a potential relationship on the request including knowing relationships with others within the department or on campus.

Failure to disclose a reportable interest or relationship or neglecting to comply with the University's policy regarding a conflict of interest, may subject the employee to disciplinary action, up to and including termination.