

UNIVERSITY OF DETROIT MERCY

Conflict of Interest and Code of Ethics

INTRODUCTION

This policy covers all full-time and part-time employees of the University. The policy specifically excludes contractors, adjunct faculty, and individuals that receive 1099 forms for their compensation reporting by UDM as opposed to W-2 forms. Individuals covered under this policy are required to complete the attached disclosure statement.

Conflict of Interest

UDM is committed to avoiding employee conflicts of interest. Conflicts of interest arise when an employee's personal economic activities, or those of the employee's family,

transaction of the University, nor does it include business-related social events where the employee is representing the University's interests.

Engaging in outside activities from which employees, their families, or their businesses will gain financially because of the employee's position at UDM.

The University requires that employees voluntarily disclose to UDM whenever a potential conflict issue arises, including any financial or personal interests which may give rise to conflicts, on a form prescribed by the Senior Attorney and approved by the President. A sample of this form is included as an attachment to this policy. The form shall be filed with the Senior Attorney, who shall prepare an annual report to the President and the Finance Committee of the Board of Trustees of the University summarizing the conflict or potential conflict issues. Failure to voluntarily disclose a potential conflict of interest to the University by the employee will be grounds for disciplinary action, up to and including termination. All applicants for employment and, all employees on an annual basis, will be required to certify that no situation giving rise to possible conflicts of interest exists, except as specifically disclosed.

The individual disclosure statements and the annual reports compiled by the Senior Attorney shall be confidential but shall be open for inspection by the Trustees and the President. The statements and reports or the information contained therein shall be open for inspection by the public only: (a) by official action of the President upon showing of good cause; (b) with the consent of the person who submitted the data which is to be disclosed; (c) by court order; or (d) as otherwise required by Michigan or federal law regulation.

Organizational Code of Ethics

The University and its employees must, at all times, comply with all applicable laws and regulations. The University will not condone the activities of employees who achieve results through violation of the law or unethical business dealings. This includes any payments for illegal acts, indirect contributions, rebates, and bribery. The University does not permit any activity that fails to stand the closest possible scrutiny.

All business conduct should be well above the minimum standards required by law. Accordingly, employees must ensure that their actions cannot be interpreted as being, in any way, in contravention of the laws and regulations governing the University's activities.

Employees uncertain about the application or interpretation of any legal requirements should refer the matter to their supervisor, who, if necessary, should seek the advice of the Human Resources Department.

Kickbacks and Secret Commissions

Regarding the University's business activities, employees may not receive payment or compensation of any kind, except as authorized under UDM's remuneration policies. In particular, the University strictly prohibits the acceptance of kickbacks and secret commissions from suppliers or others. Any breach of this rule will result in immediate termination and prosecution to the fullest extent of the law.

University Funds and Other Assets

Employees who have access to University funds in any form must follow the prescribed procedures for recording, handling, and protecting money as detailed in the University's instructional manuals or other explanatory materials, or both. UDM imposes strict standards to prevent fraud and dishonesty. If employees become aware of any evidence of fraud and dishonesty, they should immediately advise their supervisor or the Human Resource Department so that UDM can promptly investigate further.

When dealing with anyone outside UDM, including public officials, employees must take care not to compromise the integrity or damage the reputation of either the University, or any outside individual, business, or government body.

Prompt Communications

In all matters relevant to students, suppliers, government authorities, the public and others in the University, all employees must make every effort to achieve complete, accurate, and timely communications—responding promptly and courteously to all proper requests for information and to all complaints.

Privacy and Confidentiality

When handling financial and personal information about students or others with whom the University has dealings, observe the following principles:

1. Collect, use, and retain only the personal information necessary for the University's business. Whenever possible, obtain any relevant information directly from the person concerned. Use only reputable and reliable sources to supplement this information.
2. Retain information only for as long as necessary or as required by law. Protect the physical security of this information.
3. Limit internal access to personal information to those with a legitimate business reason for seeking that information. Use only personal information for the purposes for which it was originally obtained. Obtain the consent of the person concerned before externally disclosing any personal information, unless legal process or contractual obligation provides otherwise.

**EMPLOYEE DISCLOSURE STATEMENT REGARDING
CONFLICTS OF INTEREST**

I have read and understand the University of Detroit Mercy policy regarding Conflicts of Interest and Code of Ethics. I understand that as an employee of UDM, I am required to state that I am in compliance with the policy or that I have disclosures to make in accordance with the policy.

I have no disclosures to make relative to my compliance with the policy, except for the following:
