
TABLE OF CONTENTS

Section 1: Policy Statement and Purpose	2
Section 2: Standards	2
A. Individual Responsibility & Accountability	2
B. Ethical Conduct	2
C. Respect for Others	2
D. Stewardship of University Funds & Property	2
E. Compliance with Applicable Laws and Regulations.....	3
F. Compliance with University Policies & Procedures	3
G. Compliance with Contractual, Grant, and Other Private Obligations	3
H. Conflicts of Interest	3
I. Gifts & Gratuities	3
J. Confidentiality	4
K. Recording, Allocating, and Charging Costs and Effort	4
L. Internal Controls	4
M. Obligation to Report Suspected Violations.....	4
N. Consequences.....	5
O. Resources.....	5

SECTION 1: POLICY STATEMENT AND PURPOSE

As an institution that prizes and fosters ethical, responsible conduct in all its citizens, Drury University strives to maintain a business environment of integrity and excellence. The success and reputation of the University, and its ability to fulfill its core educational mission are directly dependent on the commitment of all of its employees to act in a manner beyond ethical reproach. Therefore, when conducting business on behalf of the University, either internally or externally, all University employees are expected to conform to the Standards of Business Conduct as set forth below.

These Standards articulate well-established business practices and industry best practices for all University business transactions. These Standards are emphasized and restated in various University policies and procedures, including the *Faculty Handbook* and *Staff Policy Handbook*.

These standards apply to all University employees.

SECTION 2: STANDARDS

A. Individual Responsibility & Accountability

1. Employees must assume and exercise responsibility appropriate to their position(s)/role(s) at the University.
2. Employees are accountable to themselves, the University, and each other for their decisions to act/not act.
3. When responsibilities are unclear, employees must take it upon themselves to obtain clarity.

B. Ethical Conduct

1. When acting on behalf of the University, employees must conduct themselves with honesty, integrity, and fairness toward all parties involved. Employees must act in good faith, in recognition of the position of trust and loyalty they hold in respect to the University, its students, guests, sponsors, donors, and the public.
2. Questions regarding the propriety of a course of action should be directed to an employee's divisional vice president/executive director, the Director of Human Resources, the Chief of Staff, or General Counsel.

C. Respect for Others

1. The University encourages a culture of diversity, which includes respect for and tolerance of all of its citizens. Employees must respect the rights and dignity of all university citizens and abide by the statement of nondiscrimination adopted by the University (<http://www.drury.edu/hr/staff-handbook/711-non-discrimination-statement>).

D. Stewardship of University Funds & Property

1. As stewards of University funds and property, with a responsibility to contributors to the University (tuition payers, donors, governmental entities, etc.), university employees must expend university funds wisely and treat university property with care.
2. Employees must avoid waste and improper use, and particularly must not use university funds or property for personal benefit or the benefit of a non-university entity without proper approval.

3. Employees must act with an understanding that improper use of university funds and/or property may endanger the University's non-profit and/or tax-exempt status, its student and donor relations, its reputation, and its standing in the community.

E. Compliance with Applicable Laws and Regulations

1. The University exists and operates in an environment of heavy regulation.
2. The University values compliance with all applicable laws and regulations as important not only as a matter of principle, but because noncompliance with laws and regulations may have severe adverse consequences on the University's finances, reputation, and operation of the University as a whole.
3. University employees must comply scrupulously with federal, state, and local laws and regulations that apply to the performance of their duties.
4. All employees have an obligation to inform themselves, through internal and external sources, about relevant legal obligations and keep current on changes to applicable laws and regulations.
5. Questions regarding interpretation of laws and regulations should be directed to the General Counsel. The General Counsel may escalate questions of interpretation to the University's external legal counsel, if necessary.

F. Compliance with University Policies & Procedures

1. The University has set forth various policies and procedures for managing its financial business and other matters, some as required by law, and others to ensure the prudent and efficient operation of the University.
2. All employees are expected to inform themselves of and comply with all applicable policies and procedures.

G. Compliance with Contractual, Grant, and Other Private Obligations

1. The University often enters into contractual agreements and other formal obligations with outside entities (e.g., commercial contracts for goods or services, sponsorship agreements, grant agreements, software licenses, gift indentures, etc.).
2. University employees must act in adherence to and good faith with all applicable contractual/formal obligations assumed by the University.

H. Conflicts of Interest

1. The University's Bylaws define a conflict of interest as any situation in which an individual's private interests conflict or are incompatible with his/her responsibilities to the University. A conflict of interest could involve a personal, family, or business relationship between an individual and the University that could cause the University to be legally or otherwise vulnerable to criticism, embarrassment, or litigation in the opinion of responsible persons.
2. The University's Bylaws mandate that all employees conduct their personal and business affairs in a manner that avoids situations that might lead to conflicts of interest or the appearance thereof.
3. The University requires all employees to disclose any real or potential conflicts of interest to the University, and, if necessary, the Board of Trustees.
4. For additional detail, see policy 400.102P: Conflict of Interest.

I. Gifts & Gratuities

1. Relationships between the University and its vendors must be free of any taint of improper influence.

2. University employees must not accept personally any material (>\$100) gift, gratuity, or other payment, in cash or in kind, of quasi-social nature, or in credits for vendor promotion, from any vendor currently or seeking to do business with the University.
3. Questions regarding the materiality or propriety of a proposed gift or gratuity should be directed to the Chief of Staff or General Counsel.

J. Confidentiality

1. In the course of performing their duties, university employees may be exposed to confidential information of various sorts. Such information may relate to university students, employees, vendors, donors, or other parties; proprietary information regarding the University and its operations; or information otherwise subject to contractual or legislated obligations of confidentiality.
2. University employees are expected to inform themselves of confidentiality obligations and maintain confidentiality when required. When in doubt about confidentiality requirements, employees should err on the side of caution.
3. In the event that confidentiality is broken due to an employee's indiscretion, the employee may be held personally liable for the breach.

K. Recording, Allocating, and Charging Costs and Effort

1. The accuracy and reliability of financial and effort data is critical to the business operations of the University.
2. Employees must record, allocate, and charge costs and effort accurately and in a timely manner, and must maintain supporting documentation/records as required by university policies and procedures.

L. Internal Controls

1. Internal controls are a grounding principle of sound business practices and include, but are not limited to, adequate segregation of duties; diligent application of preventive and detective control systems; and conscientious compliance with authorization, reporting, and other processes.
2. All employees are expected to maintain and comply with internal control structures within the University.

M. Obligation to Report Suspected Violations

1. If an employee believes that his/her actions have, or may have, violated this policy, he/she is advised to disclose the violation to his/her supervisor at the earliest opportunity. The supervisor then is advised to consult with the University Controller, Chief Financial Officer, Chief of Staff, or General Counsel to review and address the issue.
2. University employees are encouraged strongly to report suspected material violations of these Standards, other university policies and procedures, or laws and regulations to their supervisor, divisional vice president/executive director, the Chief of Staff, General Counsel, and/or the Office of the President, depending on the nature and severity of the suspected violation and the persons involved.
 - a. Employees and students who are not comfortable with reporting suspected violations in person may use the University's **Campus Conduct Hotline** to make an **anonymous** report (866-943-5787).

3. Individuals charged with the supervision of other employees must do so actively; this includes ensuring that all employees under one’s supervision are well informed of their duties as related to these Standards, other university policies and procedures, and/or applicable laws and regulations.
4. Supervisors are expected to take seriously and investigate appropriately any allegation of employee misconduct and to take appropriate disciplinary action to address noncompliance, when necessary.
5. An employee must not be disciplined or otherwise penalized/retaliated against for reporting, in good faith, a suspicion of noncompliance/violation.

N. Consequences

1. Violation of these Standards, of other university policies and procedures, and/or laws and regulations may result in disciplinary action, up to and including termination of employment.

O. Resources

While the Chief of Staff or General Counsel may serve as a resource regarding the application of most Standards of Business Conduct, there may be other/additional offices able to assist with specific issues, as shown below.

Issue:	Additional Assistance Resource:
Academic Fraud/Misconduct	Vice President for Academic Affairs
Conflict of Interest	Controller Vice President for Administration
Facilities & Construction	Director of Facilities Services Vice President for Operations
Discrimination, Harassment	Director of Human Resources
Environmental Health & Safety	Director of Facilities Services Vice President for Operations
Ethics	Divisional Vice President/Executive Director Chief of Staff General Counsel
Financial Policies, Internal Controls	Controller Vice President for Administration
Grants & Contracts	Manager of Corporate & Foundation Relations Director of Business Services Vice President for Administration
HIPAA	Benefits Manager Director of Human Resources
Information Technology	Technology Services Information Systems
Personnel Issues	Director of Human Resources
Student Issues	Vice President for Student Affairs
Other	Divisional Vice President/Executive Director

References:

Standards of Business Conduct, Yale University