

CONFLICT OF INTEREST POLICY
May, 2018

This statement is intended to set forth the basic policy of the University with respect to conflicts of interest.

It is the policy of Adelphi University that all employees have an obligation to avoid situations which might make it difficult for them to act in the best interests of the University. All employees must avoid placing themselves in any positions or situations in which there may be a conflict or the appearance thereof between his/her personal interests and his/her duty to Adelphi. Areas of potential conflict include, but are not limited to, use of confidential information, university purchases not subject to competitive bids, the acceptance of gifts, etc.

While it is impractical to define every instance that might give rise to a conflict of interest, in general, each employee must avoid participating directly or indirectly in any transaction involving Adelphi which could result in a personal benefit to the employee, their family or friends. Conflicts of interest exist whenever an employee or a member of the employee's family (spouse, children and dependents) or close personal friend (including relatives not covered by the term "family") receive a direct or indirect pecuniary or material benefit from an entity dealing with the University, and the interest is of such a nature that his/her decisions may appear to be affected by the benefit.

Any employee who has, will have, or later acquires a benefit which may appear to be a conflict of interest should disclose the benefit to the appropriate supervisor as soon as he/she has knowledge of such actual or prospective benefit. The appropriate supervisor is then responsible for apprising the Office of Human Resources.

Examples of Conflicts

An employee has a duty to disclose a potential conflict of interest even if it is not an example listed.

While it is not possible to enumerate all situations which might give rise to a violation of this policy, the examples given below indicate some conduct which should be avoided:

1. For an employee or any family member (see above) or close personal friend to have an interest in or be employed by any organization which has business dealings with the University where there is an opportunity for preferential treatment to be given or received.
2. For an employee to authorize for University use any product or service furnished by an organization or corporation through which the employee or family member (see above) or close personal friend will receive a financial gain by such use.
3. For an employee to give or release any data or information of a confidential nature to outsiders or to otherwise use information for personal advantage.
4. For an employee or family member (see above) or close personal friend to accept gifts in cash or in kind (including materials or services) or favorable treatment from companies seeking to engage or engaged in business with Adelphi, particularly in situations in which it might be inferred that the intention was to influence the decisions of the employee and actions of the University, without the approval of the employee's supervisor.

It should be understood that while achieving results are essential, it is equally essential that we do so with integrity. Open disclosure and discussion of any questionable situation is at the heart of this policy. Employees are encouraged to bring to their supervisor's attention any situation which raises a potential conflict of interest or the appearance thereof. In addition to any penalty contained in any provision of federal or state law, a violation of the above Policy may result in discipline, including termination, in the manner provided by Adelphi University.

CONFLICT OF INTEREST AFFIRMATION

I, _____, acknowledge receipt of the University's Conflict of Interest Policy and agree to abide by it. I understand my obligation to avoid conflicts of interest or the appearance thereof, and to communicate any potential conflicts to my supervisor. If I am unsure whether or not I should disclose a matter, I can discuss my question with the Office of Human Resources.

Signature
Rev. 04/18

Date