

CONFLICT OF INTEREST POLICY

Approved by Administrative Council 6/08/20

Effective date 6/08/20

Conflict of Interest

A university's reputation for integrity is its most valuable asset and is directly related to the conduct of its employees. Therefore, the university adheres to the highest legal and ethical standards applicable in our business. The university's business is conducted in the strict observance of both the letter and spirit of all applicable laws and the integrity of each employee is of utmost importance.

Employees must never use their positions with the university, or their relationships with any of its students, for their own private financial or business gain, to advance personal interests or to obtain favors or benefits for themselves, members of their families or any other individuals, corporations or business entities. Even the appearance of an undue influence or conflict of interest with respect to an employee's actions can be harmful to the university. For this reason, employees of the university shall conduct their personal affairs in such a fashion as to ensure that their ability to perform their duties and responsibilities to the university are not compromised or impacted, as well as to ensure that the integrity and reputation of the university remains untarnished by the employee's connection with the university.

This policy is intended to supplement but not replace any applicable state and federal laws governing conflict of interest.

Duty to Disclose

Employees must disclose to their supervisor all university business activities the employee has an opportunity to initiate or influence that could result in, or appear to result in, a private financial or business gain, an advancement of a personal interest, or a favor or benefit to the employee, to a member of the employee's family, or to any other individuals, corporations or business entities with whom the employee is or appears to be associated. Upon receiving such information, the supervisor must take appropriate steps necessary to insure that the matter is then transacted in such manner that the integrity and reputation of the university is not compromised or adversely impacted. The University reserves the right to require an employee to refrain from or stop participating in a business activity that violates this policy or is otherwise in conflict with the employee's duties to the University.

Reporting Suspected Misconduct

Roseman University requires its employees, directors and officers to perform their duties and responsibilities in accordance with applicable laws and regulations, University policy and procedures and high ethical standards. The University is committed to compliance with all applicable laws and regulations through the promulgation and administration of policies that faithfully apply them. A culture of compliance strengthens and promotes ethical practices and

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respectful treatment of all members of the University community and those who conduct business with the University.

Each member of the University community shares responsibility for stewardship of University resources and compliance with applicable laws and policies. Therefore, University faculty, and staff have a responsibility and are encouraged to submit a report in accordance with this Policy, describing in detail any conduct by University employees, directors, officers, students, or other parties that may result in financial loss or other harm to the University. The University shall thereupon have a duty to investigate.

This Policy is not intended to supplant, but rather to complement and supplement, existing University policies. It thus does not affect any rights, responsibilities or procedures set forth in other University policies addressing misconduct. For example, complaints or grievances regarding discrimination, sexual harassment, academic and disciplinary matters, academic freedom, and other matters as to which there are specific University policies, should ordinarily be made and addressed in accordance with the University policies applicable to such matters and applicable law.

Any employee who has a question about the propriety of any practice under University policies or procedures should ordinarily seek guidance from his or her supervisor, Unit Head, or from the Office of Human Resources.

Instances of suspected misconduct should be reported to the Director of Human Resources, except as follows:

Person Suspected of Misconduct

Academic Program Directors, Deans,
Chancellors or Vice Presidents

Director of Human Resources

University President

Report Incident to

Director of Human Resources or
University President

University President

Chair, Roseman University
Board of Trustees
c/o Ronald Reynolds, Attorney-at-Law
823 Las Vegas Boulevard South, Suite 280
Las Vegas, NV 89101
(702) 445-7000

IN THE EVENT THE REPORTING PERSON HAS A LEGITIMATE CONCERN WITH SUBMITTING THE REPORT AS DIRECTED ABOVE, THE REPORT MAY BE SUBMITTED TO THE CHAIR OF THE BOARD OF TRUSTEES, C/O RONALD REYNOLDS, ATTORNEY-AT-LAW, AT THE ADDRESS AND TELEPHONE NUMBER LISTED ABOVE.

A Reporting Person may request that a report made under this Policy be handled as confidentially as possible under the circumstances. Although the University will endeavor to

handle all such reports with discretion and due regard for privacy, other obligations and considerations may preclude the University from maintaining complete confidentiality in all circumstances. No individual who in good faith reports a violation or suspected violation shall thereby suffer retaliation or adverse employment and/or academic or educational consequence. An employee who retaliates against someone who has made a report in good faith under this Policy is subject to disciplinary action, up to and including dismissal from the University. Individuals who believe they have suffered retaliation may report it to one of the reporting venues identified above.

This policy is intended to encourage and enable those in the University Community to raise serious concerns within the University prior to seeking outside resolution. Reports made in bad faith or with knowledge of their falsity may subject individuals to disciplinary or other appropriate action. Making a report under this Policy shall not insulate an individual from personnel or other actions that are warranted based on performance or other factors and are not caused by the making of a complaint under this Policy.

Gifts/Use of University Funds

The following modest (\$75 or less) non-cash gifts are allowed under this policy for the purchase of flowers or appropriate commemorative item for employees to give on behalf of the university in any of the following situations:

- 1) Serious illness of an employee or employee's immediate family member or the birth or adoption of a child;
- 2) Death of an employee or employee's immediate family member;
- 3) In recognition of a long-term employee who is leaving or retiring from the University.

Non-cash gifts greater than \$75 must be approved in advance by the Unit Head. Any requests for an exception must be submitted prior to expenditure of university funds. No retroactive approvals will be granted. All expenses for gifts based on University/employee relationships must be charged to an unrestricted Financial Accounting System account.

Expenditures for all other use of university funds for personal gifts, including office parties and meals in celebration of a special day such as a national holiday, birthday, wedding, child birth, etc., is prohibited and must be paid through the use of personal funds.

Standards of Conduct

Each employee has an obligation to observe and follow the university's policies and to maintain proper standards of conduct at all times. If an individual's behavior interferes with the orderly and efficient operation of a unit, corrective disciplinary measures will be taken.