



Policy Title: **Code of Ethical Conduct**

Policy Number: PS 22

Purpose of Policy: The purpose of this Code of Ethical Conduct is to ensure that all University business is conducted with the highest standards of integrity and in compliance with all applicable laws and regulations. The Code sets forth the University's policy with respect to our fundamental values, sound business ethics, and potential for conflicts of interest. It is Bellevue University's policy not to tolerate unethical or unlawful behavior by any employee.

Applies to: All Employees

Policy Statement:

1. The goal of this policy is to establish general guidelines intended to preserve the good name of Bellevue University by developing and maintaining ethical relations between the University and its students, suppliers, the communities in which we operate, and all stakeholders.
 - a. As representatives of Bellevue University, employees should reflect the views and interests of the University, setting aside any personal or departmental bias.
 - b. At all times, employee conduct should comply with the principles and personal ethics outlined in this policy.
 - c. It is the responsibility of all Bellevue University employees to obey all applicable laws and regulations; provide a positive and safe work environment; and protect University assets and reputation.
2. Stakeholder Interests: A stakeholder is an individual who has an interest in the manner in which Bellevue University operates its business. At times, individual needs and requirements may conflict with the best interests of the University or with company goals. Follow the guidelines in this policy whenever a conflict arises. Contact Human Resources if the situation involves a potential legal issue.

3. Ethical Leadership: Ethical business practices require ethical leadership. Inherent in Bellevue University's Key Values, it is incumbent upon management, especially senior management, to conduct itself in an ethical manner at all times and to create an environment that promotes ethical behavior in others. Ethical leadership will yield ethical employee practices.
4. Standards of Ethical Conduct: The following are standards for ethical conduct which should be followed by all Bellevue University employees.
 - a. Employees should:
 - (1) Demonstrate University loyalty.
 - (2) Strive to meet performance standards and uphold our Key Values at the highest levels.
 - (3) Avoid actions or communications that may be interpreted as unethical or compromising behavior.
 - (4) Promote positive and impartial relations with suppliers by conducting competitive bidding in a professional manner.
 - (5) Avoid activities that give rise to a conflict of interest or the appearance of a conflict of interest, without making full disclosure to and obtaining prior approval from Executive Management and the President.
 - (6) Comply with all legal requirements, laws, and regulations affecting the organization and their personal obligations.
 - (7) Be aware of legal ramifications associated with the violations of laws regarding confidentiality and fair trade.
 - (8) Treat all employees, students, and external contacts with respect and professionalism.
 - (9) Adhere to the policy and procedures established for purchases made for the University.
 - (10) Discuss any questions concerning interpretations or compliance with the code of ethics with their manager or senior executive.
 - b. Employees should not:

- (1) Participate in private business or professional activities that may conflict with the best interests of the University.
- (2) Accept money, loans, discounts, services, gifts, or favors from existing or potential vendors or suppliers.
- (3) Discourage the University's trade with qualified small or minority-owned businesses on the basis of personal prejudice.
- (4) Involve the company in a business proposition or personal program for purposes of personal gain.

5. Conflicts of Interest:

- a. To avoid even the appearance of a conflict of interest which would tarnish the image of the organization and undermine the public trust in the University all employees should avoid any activity or outside interest which conflicts or appears to conflict with the best interest of Bellevue University.
- b. Examples of real and potential conflict situations that should be avoided:
 - (1) Competing directly or indirectly with Bellevue University.
 - (2) Accepting a business gift, gratuity, or service (generally more than \$50 in value) that might influence the discharge of his/her duties should be reported to their manager and the Senior Director of Human Resources.
 - (3) Solicitation of gifts or receiving a cash gift or gratuity, in any amount, is strictly prohibited.
 - (4) Nepotism (actual or perceived) can have serious repercussions on department morale and effectiveness. Therefore, an employee in a managerial position, at any level, may not have a relative employed within their functional area where a direct reporting relationship would exist or favoritism could be perceived. An employee who has a family member (employee or consultant) working for the University must disclose the fact to his or her manager (the manager is responsible for notifying Human Resources). An employee who fails to disclose the names of any relatives working at the University could be subject to corrective action and /or termination of employment.

6. Violations:

- a. Reports of known or suspected violations of this policy should be made to the Senior Director of Human Resources or the President. The report should set forth in detail the

basis for the individual's concern of financial impropriety, misuse of resources, or other apparent violation of the Code. All reports will receive a preliminary review to determine the appropriate course of action. If further action is deemed appropriate, the Senior Director of Human Resources or President will assign a neutral investigator to thoroughly investigate the matter and make recommendations for resolution.

- b. All employees have an ethical and, in some cases, a legal obligation to call to the University's attention any violation of this policy. No disciplinary or retaliatory action shall be taken against an employee that informs the University in good faith of possible policy violations. Employees who violate this policy shall be subject to disciplinary action up to and including termination.

Supporting Documentation: Employee Handbook, Faculty Handbook

Keywords: employees, staff, faculty, ethics, ethical conduct, conflicts of interest, gifts, solicitation, nepotism

Responsible Office: Human Resources

Contact Information: Human Resources
402-557-7351

Approved by: Dr. Mary Hawkins

Effective Date: January 31, 2018

Review Cycle and Dates: This policy statement supersedes previous versions of PS 22, dated October 1, 2007.

APPROVED:

/signed/
Dr. Mary Hawkins, Bellevue University President

1/31/2018
Date