



1886

NATIONAL
LOUIS
UNIVERSITY

**CONFLICT OF INTEREST AND CONFIDENTIALITY STATEMENT
ACKNOWLEDGEMENT (All Staff Employees below the Director level)**

This is to acknowledge that I have received a copy of National Louis University's Conflict of Interest and Confidentiality Policy and certify that I have read and understand it. I also understand that I am responsible for familiarizing myself with the contents of the policy and I agree to be bound by the terms of the Conflict of Interest and Confidentiality Policy.

I agree to report any incidents or suspected incidents and/or violations that I suspect or become aware of to the proper individuals set forth in the policy.

The following is a list of all entities personally known to me to be currently engaged in transactions with National Louis University, and in which I or a member of my immediate family has an interest in one or more of the following capacities: director, trustee, officer, owner, partner or other significant capacity:

Employee Signature

Date

Print Name

NATIONAL LOUIS UNIVERSITY

HUMAN RESOURCES POLICY AND PROCEDURE

POLICY TITLE:	Conflicts of Interest and Confidentiality
EFFECTIVE DATE:	January 2005; Amended September 2007; January 2016
SCOPE:	Full-time staff, Part-time staff, Student employees

PURPOSE

To explain conflicts of interest and confidentiality obligations when acting on behalf of National Louis University.

POLICY

Employees may not engage in any activity, practice or conduct which conflicts with, or appears to conflict with, the interests of the University, its students, its customers, or its suppliers. Since it is impossible to describe all of the situations that may cause or give the appearance of a conflict of interest, the prohibitions included in this policy are not intended to be exhaustive and include only some of the more clear-cut examples.

Ethical and Professional Conduct

Employees must represent the University in a positive and ethical manner. Employees have an obligation to avoid conflicts of interest and to refer questions and concerns about potential conflicts to their supervisor.

Employees may not engage in, directly or indirectly either on or off the job, any conduct which is illegal, disloyal, disruptive, competitive, or damaging to the University. Employees may not solicit from or sell to the University's students, fellow employees, customers or vendors/suppliers.

Employees may not accept any employment relationship with any organization that does business with or competes with the University. This prohibition on employment includes serving as an advisor or consultant to any organization of that type, unless the activity is conducted as a representative of the University.

Employees must disclose any financial interest they or their immediate family have in any firm or organization that does business with the University or that competes with the University. The University may require divestiture of the interest if it considers the financial interest to be in conflict with its best interests.

Employees and their immediate family may not accept gifts, except those of nominal value, or any special discounts or loans from any person, firm or organization doing or seeking to do business with the University. The meaning of gifts for purposes of this policy includes the acceptance of entertainment and free travel and lodging.

Employees may not give, offer, or promise, directly or indirectly, anything of value to any representative of a customer, of a potential customer, or of a financial institution in connection with any transaction or business that the University may have with that customer, potential customer, or financial institution. Employees are prohibited from misusing University information by disclosing it to anyone, either inside or outside the University, who does not have a legitimate business need to know it.

Disclosure and Use of Confidential Information

“Confidential information” includes information concerning National Louis University's operations, activities, business affairs, employees, students (including all student or client information disclosure of which is prohibited by the Family Educational Record Privacy Act, the Health Information Privacy and Portability Act or other federal or state laws), vendors and suppliers which is not readily accessible to the general public, and any other information which is private to the University, has not been released to the public and would not be in the best interest of the University if disclosed to competitors or others. It also includes material and information obtained or developed by an employee, either alone or in concert with other employees, as part of the employee's work assignment. Such information belongs to the University. Confidential information must not be disclosed to anyone in the University who does not have a legitimate business or educational need to know or to anyone outside of the University, except in accordance with established University procedures. Employees agree that they will not make any unauthorized disclosure of confidential information that is prohibited by the policy and that they will not seek to use any confidential information for their own, or any third party's financial or business benefit. These obligations survive the cessation of an employee's employment by the University and remain in place unless and until the information becomes publicly known other than through the employee's fault.

Improper Use of University Funds and Property

Improper use of University funds and property includes, but is not limited to, forgery or alteration of University documents, misappropriation of student payments or other University assets, and irregularity in handling or reporting money transactions. False or artificial entries shall not be made in the records of the University for any reason. Such action can result in criminal and civil penalties to the University and its employees, as well as disciplinary action up to and including termination.

Consequences of Non-Compliance

Any conflict of interest must be disclosed to the University. Failure to comply with the provisions of this policy will result in disciplinary action, up to and including termination. Breach or threatened breach of obligations pertaining to confidentiality of information may be addressed through the discipline system, or if an employee has left the University's employment through appropriate action for damages or injunctive relief.

Procedure

Upon hire, employees of the University will receive a copy of this policy and are required to complete the attached Conflict of Interest and Confidentiality Statement Acknowledgment Form – All Employees and return it to the Office of Human Resources. In addition, employees in a Director level and above position are required to complete the attached Conflict of Interest and Confidentiality Statement Acknowledgment Form – Director and Above on an annual basis and return it to the Office of Human Resources.

Individuals with questions about this policy should contact the Office of Human Resources.

Ref Code of Conduct Policy