

## CONFLICT OF INTEREST POLICY

Please review the policy below and send the signed  
Employee Certificate of Compliance ONLY to Myra  
Quick

Manager of Employment and Employee Development, Human Resources

### Section 1. Statement of Policy

a. It has been and shall continue to be the policy of the University that all full-time and part-time regular staff avoids any conflict, or appearance of conflict, between personal interests and the interests of the University in dealing with any organization or third party. When staff are aware that such organization or individual (i) has or seeks to have a business relationship with the University, or (ii) has objectives or interests that may be adverse to the University's interests, staff are expected to avoid such conflicts

relationship, family relationship or other relationship that may appear to impair the individual's ability to perform the duties of the University, or receives, or may receive, confidential information.

c. This policy is to be interpreted and applied in a manner that will best serve the interests of the University. In some cases it may be determined that after full disclosure of those concerned, the University's interests are best served by participation by the individual despite an apparent conflict of interest.

d. All staff shall be advised of this policy during their orientation to the University, and sign a Certificate of Compliance at that time.

### Section 2. Definitions

a. Business Relationship'

A business relationship is a relationship between two persons that includes any of the following:

1. One person is employed by the other in a sole proprietorship, or by an organization with which the other is associated as an employee, director, officer, key employee, or greater than 35% owner.
2. One person is transacting business with the other (other than in the ordinary course of either party's business on the same terms as are generally offered to the public), directly or indirectly, in one or more contracts of sale, lease, license, loan, performance of services, or other transaction involving

3. The two persons are each director, employee, officer, or greater than 10% owner in the same business or investment entity.

Ownership is measured by stock ownership (either voting power or value) of a corporation, profits or capital interest

2. The University will

