

<p style="text-align: center;">MANHATTAN COLLEGE EMPLOYEE CONFLICT OF INTEREST POLICY</p>

In order to prevent the occurrence of any conduct by members of the College's staff which could be considered a conflict of interest with the individual's responsibility to the College, the College is committed to (a) avoiding conflicts between the personal interests of administrators and the interests of the College, (b) disclosing any personal interest that may conflict with the interests of the College, and (c) refraining from actions or conduct which could otherwise influence a decision of the College on any matter in which such a conflict exists or could be perceived to exist. To further the commitment, the College has adopted this policy concerning conflicts of interest.

A conflict of interest on the part of any College employee, any member of the immediate family of an employee or any individual occupying the same household as the employee, shall be disclosed in writing by the employee at least annually and made a matter of record; when we refer to employee or staff in this policy it is meant to include members of the family and household. When any such interest becomes relevant to any subject requiring action of the College, the employee having a conflict shall call it to the attention of the Vice President for Finance and the Vice President of Human Resources. In the event an employee is not sure that an actual conflict exists, or believes the situation may only be a potential conflict, the employee is required to advise the College of the potential conflict promptly and seek guidance on how to deal with the matter.

Conflicts of interest arise in a number of ways and some are more obvious than others. These conflicts can develop over personal relationships, where an individual has material financial interests, when outside activities relate to College responsibilities and in the use of College resources. Therefore, disclosure and transparency have become key requirements for monitoring and managing conflicts. In addition, gaining an understanding that the integrity of the College rests, in part, on the ethical performance of a person's duties and responsibilities will prevent conflict situations from developing.

College staff must be attentive to their actions at the College and with external entities. Staff must avoid making decisions which affect an individual with whom a staff member has a personal or family relationship. It is difficult to avoid an inference of subjectivity and preferential treatment when dealing with a relative or someone with whom the employee has a personal relationship. In a similar fashion, staff must avoid a situation where College resources are used for personal reasons or outside activities. College space, supplies, equipment and systems are maintained for College use and may not be used for activities which are not directly part of College operations.

Conflicts can arise when staff engage in transactions for the College. Staff are not to encourage or permit College business to be placed with any entity or vendor with whom the staff member has a financial relationship or interest, or where there is a family or close personal connection. A staff member should not engage in College business with any entity or vendor which provides any benefit to the College employee, such as payments, gifts or favors. Similarly, a staff member should not take a consulting or advising position with an entity or business which does business with the College. In all of these potential situations, the staff person must disclose the opportunity or offer to the College for their review and consideration. Gifts or entertainment generally are to be declined so that not even an appearance of impropriety can arise.

When College staff engage in activities and business interests outside their College position, they are to avoid the creation of any conflicts with their primary position with the College. A staff person who engages in outside consulting should not do so in a manner that impacts the individual's responsibility to the College. Where a staff person sits on an outside Board or works with an outside organization, it is important that it not create a conflict with their duty to the College.

The employee having such a conflict shall not participate in or use any personal influence in the discussion of the conflict arrangement or make any recommendations regarding the subject of the conflict. However, the employee will explain the nature of the conflict, and will provide pertinent information requested by the College when the employee's knowledge of the subject will assist the College. The employee who has a conflict will not participate in any decision-making meeting on the subject, will not make a decision on the matter, and will not try to influence the College's decision. An employee in a potential conflict situation will refrain from any actions that could further the conflict. A memo noting the disclosure of the conflict shall be prepared and maintained where practical.

Human Resources annually shall make available to employees copies of this policy, and shall have the copy of the policy signed in acknowledgment of its receipt by senior academic and administrative staff, those in a position to influence College decisions, and as the need arises. The employee has an on-going independent obligation to advise the College in writing if a conflict, or potential conflict, develops after the annual disclosure has been completed.

**MANHATTAN COLLEGE
CONFLICT OF INTEREST POLICY - DISCLOSURE BY EMPLOYEE**

I (or a member of my immediate family or an individual occupying the same household) may have a conflict of interest (or potential conflict of interest) with the College as a result of (provide details of the nature o the relationship, college activity that may be involved, and/or the extent of personal gain that could be realized.) All responses will be made for my activities and on behalf of family and members of my household.

I have the following business or personal involvements which could impact my duties for the College and am advising the College of the details:_____

OR

I have no knowledge of any existing or potential conflict at this time but understand that I have a continuing obligation to advise of any conflict that arises during the year.

I have read the Employee Conflict of Interest Policy.

_____ Signature of Employee	_____ Name of Employee	_____ Date
--------------------------------	---------------------------	---------------

**

Reviewed by College

_____ Signature of Reviewer	_____ Name of Employee	_____ Date
--------------------------------	---------------------------	---------------

PLEASE RETURN THIS FORM TO HUMAN RESOURCES

