SAINT LOUIS UNIVERSITY

CONFLICT OF INTEREST POLICY
RESOURCE COMMITMENT

Policy Number: 1.5.1
Classification: 
Responsible University Official: Vice President and Chief Financial Officer

1.0 PURPOSE

This Conflict of Interest Policy (the Administrative "Policy") is intended to protect the interests of Saint Louis University (the "University") when it is contemplating entering into any transaction or arrangement involving the commitment of University resources that might benefit the private interest of an authorized representative of the University, or a Family Member, as defined herein, of an authorized representative of the University and to monitor the activities of an authorized representative of the University or an authorized representative’s Family Member, that may compete with, or be detrimental to, the interests of the University.

2.0 POLICY

It is the policy of the University that the highest standards of conduct and honesty are expected of all employees of the University, especially authorized representative of the University, including the President, Vice Presidents, administrative staff members and faculty members with administrative responsibilities, and such other employees having responsibility for committing or encumbering University funds or resources. In order to assure the adherence to these standards, it is essential that a mechanism be provided for disclosing and ethically resolving conflicts of interest or perceived conflicts of interest which may occur in the performance of the assigned duties of these personnel.
3.0 SCOPE

This policy applies to all University personnel who as part of their assigned duties commit or cause to be committed financial and other resources of the University.

4.0 DEFINITIONS

4.1 Conflict of Interest: Any authorized representative who has a direct or indirect Financial Interest, as defined herein, a direct or indirect Competing Interest, as defined herein, in any action the authorized representative takes or proposes to take in the representative’s University capacity, or discloses or uses information relating to the University's business for the personal gain of the representative or for an immediate family member of the representative is deemed to have a Conflict of Interest.

4.2 Financial Interest: An authorized representative of the University who proposes to act on behalf of the University has a "Financial Interest" if the person has, directly or indirectly, through business, investment or Family Member relationship:
   a. An ownership or investment interest in any entity or individual with which the authorized representative proposes the University enter into a transaction, arrangement, or business relationship; or
   b. A compensation or other financial arrangement with any entity or individual with which the authorized representative proposes the University enter into a transaction, arrangement, or business relationship; or
   c. An actual or potential ownership or investment interest in, or compensation or other financial arrangement with any entity or individual, which the authorized representative is negotiating or in the position to influence a transaction, arrangement or business relationship of behalf of the University.

4.3 Compensation: “Compensation” includes any direct or indirect remuneration in cash or in kind, including payment for services, gifts or favors that are substantial in nature, or forgiveness of amounts owed.

4.4 Competing Interest: An authorized representative of the University has a "Competing Interest" if the person has, directly or indirectly, through business, investment, or a Family Member relationship:
   a. An ownership or investment interest in any business or entity which undertakes activities that compete with, potentially compete with, or are adverse to the University's interests; or
   b. A compensation or other financial arrangement with any entity or individual which undertakes activities that compete with, potentially compete with or are adverse to the University's interests; or
   c. An actual or potential ownership or investment interest in any business or entity, or a potential compensation or financial arrangement with any entity or individual, which undertakes activities that compete with, potentially compete with, or are adverse to the University's interests.
4.5 **Family Member**: Family Member includes the individual's spouse, brothers or sisters (by whole or half-blood), children, grandchildren, and great-grandchildren, and ancestors, and the spouses of brothers or sisters, children, grandchildren, and great-grandchildren.

4.6 **Ownership or Investment Interest**: An “ownership or investment interest” is an interest established by equity, debt, or other means.

### 5.0 PROCEDURE

5.1 This policy will be reviewed annually with all University representative authorized to commit University funds or resources for the purpose of reaffirming the commitment of the University to the standards of conduct expected of University personnel in the performance of their assigned duties.

5.2 The provost and each vice president annually shall prepare a listing of all personnel within their respective unit who are authorized to commit on behalf of the University. The list will include all administrative staff members, faculty with administrative responsibilities, and any employees who, on a regular basis, have both the authority and responsibility to commit the University to contractual relationships, or commit or encumber the funds of the University, whether general operating, restricted, or designated in nature.

5.3 All personnel who have been identified and are identified by the process described in Section 5.2 annually shall receive a disclosure statement for the purpose of disclosing potential or existing conflicts of interest and an attestation statement regarding gifts, gratuities, and entertainment. Each person receiving the statement is required to complete and sign the disclosure statement, identifying any potential or existing conflicts of interest or attesting to the fact that there were no areas of potential or existing conflicts of interest, and attesting to the fact that no gifts, gratuities, or excessive entertainment were received.

5.4 The completed, signed statements shall be returned to the Provost or respective vice presidents for their initial review. All disclosure statements will then be forwarded to the Vice President and Chief Financial Officer who will compile the responses and comments and provide a report to the President and the Audit Committee of the Board of Trustees.

5.5 All personnel receiving an annual disclosure statement will be responsible for providing notification to the Provost of respective Vice President of any instances of conflict of interest which may occur in the interim period between the dates of the regular annual reporting and shall be responsible for reporting any potential or existing conflicts involving other personnel subject to this Policy.

5.6 Failure to fully disclose any potential or existing conflicts of interests may result in disciplinary action.