

Conflict of Interest and Commitment Policy



Policy Number: 02.055	Responsible Office: Human Resources	Governing Body: College Council	Last Review Date: 04/26/2024
Scope: Compliance with this Policy is the responsibility of every College employee, including the duty to immediately report any possible violations.			

I. Introduction

It is Antioch College’s policy that all employees avoid any conflict between their personal interests and those of the College. The purpose of this policy is to ensure that the College’s honesty and integrity, and therefore its reputation, are not compromised. The fundamental principle guiding this policy is that no employee should have, or appear to have, personal interests or relationships that actually or potentially conflict with the best interests of the College.

II. Employee-Vendor Relationship

An employee-vendor relationship is any relationship between an Antioch College employee and a proposed vendor that might create a conflict of interest.

A. Prohibited conduct includes but is not limited to:

- a. All staff and faculty from selling goods or services as a vendor to Antioch College.
- b. Procurement of goods or services from near relatives of employees.
- c. Transactions with any business in which an employee or their near relative owns or controls more than a 10% interest.
- d. Holding an interest in or accepting free or discounted goods from any organization that does, or is seeking to do, business with the College, by any employee who is in a position to directly or indirectly influence either the College’s decision to do business, or the terms upon which business would be done with such organization.
- e. Profiting personally, e.g., through commissions, loans, expense reimbursements or other payments, from any organization seeking to do business with the College.

B. Any promotional benefits that result from a business transaction must be provided to the College (or one of its department) and must not be retained by the employee.

C. In conducting College business, employees may encounter offers of gifts from vendors. The following guidelines apply:

- a. Offers of gifts should generally be refused.
- b. While there may be occasion to accept such gifts (ex. Promotional pens or note pads), these or other gifts should never be accepted in return for a business favor.

- c. The cumulative value of gifts received from all vendors in total should not exceed \$75 in any 12-month period.
- d. Employees should review with their supervisors any offers of gifts.
- e. Employees who are uncertain about whether or not to accept an offer from a vendor are advised to not accept the offer if there are any doubts.

D. An employee-vendor relationship must be disclosed before a purchasing commitment is made. The department must learn the status of the proposed vendor early in the process to avoid issues. The Conflict of Interest policies apply to all transactions involving employee-vendor relationships:

- a. At any dollar amount
- b. In the procurement of any type of service
- c. In the procurement of any type of goods (purchase or lease)

A conflict of interest would also exist when a member of an employee's immediate family is involved in situations such as those above.

All College officers and employees are expected to act with integrity and good judgement when conducting business at the College. Anyone who becomes aware of a potential conflict of interest and finds it has not been properly disclosed is expected to notify Human Resources so the situation can be resolved.

III. Conflict of Interest

A conflict of interest may occur whenever an employee's interest in a particular subject may lead them to actions, activities or relationships that undermine the College and may place it at a disadvantage.

It is not possible to give an exhaustive list of situations that might involve violations of this policy. However, the situations that would constitute a conflict in most cases include but are not limited to:

- a. Holding any interest in an organization that competes with the College.
- b. Being employed by (including as a consultant) or serving on the board of any organization which does, or is seeking to do, business with the College or which competes with the College.
- c. An employee of the College may not hire, appoint, or supervise a relative or member of their household or a relative or member of the supervisor's household.
- d. Employees may not supervise or participate in the processes of review and decision-making on matters concerning retention, promotion, salary, termination, or discipline of the employee's relative or household member or a relative or household member of the employee's supervisor.

A conflict of interest would also exist when a member of an employee's immediate family is involved in situations such as those above.

IV. Conflict of Commitment

A conflict of commitment can arise when an employee's external activities, e.g., consulting agreements, speaking engagement, public service, personal business, etc. interfere with the employee's responsibilities to the College.

- a. All full time College employees should make the fulfillment of their responsibilities to the College the focal point of their professional activities.
- b. Use of College resources including, but not limited to, facilities, parking permits, personnel, equipment or vehicles for any purposes other than the performance of the individual's College employment is prohibited unless authorized by the supervisor.
- c. Acceptance of employment, consulting or public service that can result in conflicts or the appearance of conflicts with employee's primary commitment of time and energy to the College is prohibited.
- d. Any exceptions have to be approved in writing in advance by the supervisor.

V. Business Conduct

The highest standards of business ethics and conduct should be applied by all College employees in relations with Suppliers, Vendors and other outside organizations. In conducting business employees are expected to act fairly and objectively and in the best interest of the College.

VI. Procedures

It is important to properly address conduct that are deemed to be Conflicts of Interest or that may create the appearance of a Conflict of Interest.

- a. Disclosure: Employees must disclose the actual or possible Conflict of Interest to Human Resources as soon as possible so that safeguards and a conflict management plan can be established. All employees are expected to participate and cooperate with the processes set forth in this policy.
- b. Determination: Human Resources shall make a determination as to whether a Conflict of Interest exists and implement the appropriate safeguards and conflict management plan to protect the College and the parties.
- c. Addressing the Conflict of Interest: If Human Resources determine that arrangement free from a Conflict of Interest is not reasonably possible under the circumstances, Human Resources shall make a decision as to whether the transaction or arrangement is possible.

VII. Violation

If Human Resources has reasonable cause to believe that an employee has failed to disclose an actual or possible Conflict of Interest, it shall inform the employee of the basis of such belief and afford the employee an opportunity to explain alleged failure to disclose. If, after hearing the employee's response and further investigation as warranted by the circumstances, Human Resources determine that an employee is in violation of the policy, it shall take appropriate actions up to and including termination.