

UNIVERSITY of



DAYTON

## Conflict of Interest Policy

Effective Date:

Approval:

Maintenance of Policy: Vice  
President, Human Resources

**PURPOSE:** The participation of employees in external activities that enhance their professional skills or constitute public service can be beneficial to the University as well as the individual employee. External activities can sometimes lead to conflicts of interest with regard to an employee's university responsibilities. As such, this policy is intended to provide a framework for recognizing and managing employee conflicts of interest, and whenever possible, to prevent even the appearance of conflicts of interest. While the primary goal of this policy is to prevent an employee's external activities from adversely influencing University operations, this policy is also intended to protect employees from undue suspicion that their external activities may improperly influence university operations.

**SCOPE:** All employees of the University of Dayton.

**POLICY:** An employee shall be considered to have a possible conflict of interest if (a) s/he has an existing or potential financial or other interest which impairs or appears to impair his/her ability to exercise independent and unbiased judgment in the discharge of his/her responsibilities to the University; or (b) such employee is aware that a member of his/her family, or any organization in which such employee (or member of his/her family) is an officer, director, employee, member, partner, trustee or controlling stockholder, has an existing or potential financial or other interest which impairs or appears to impair the employee's ability to exercise independent judgment in the discharge of his/her responsibilities to the University; or (c) the employee may receive a financial or other material benefit through inappropriate use of knowledge or information confidential to the University.

Conflicts of interest can arise under many situation, including establishing and/or maintaining business relationships, purchasing decisions, gifts, appropriation of assets or services, research activities, and decision-making related to students, faculty, staff, and/or family members. Any employee

### REFERENCE DOCUMENTS:

1. University of Dayton Conflict of Interest Policy for Sponsored Research Programs
2. University of Dayton Policy on Illegal, Fraudulent, Dishonest and Unethical Conduct

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## Conflict of Interest Policy, (continued)

POLICY (continued):

who is uncertain in any matter about whether a conflict of interest exists or appears to exist must request a determination by his/her supervisor. If the supervisor feels that there is a reasonable possibility that a conflict of interest exists, the appropriate vice president should be informed. If necessary, a vice president will consult with the interested parties, and seek other counsel to determine if there exists a conflict. The vice president will then advise those involved of the findings, and make such determinations as required by the circumstances.

In addition, in order to be in compliance with the requirements of various federal agencies, the University has also adopted a Conflict of Interest Policy for Sponsored Research Programs.