



Business Ethics and Integrity Code for Sponsored Research

Effective Date: June 30, 1998

Approval: January 8, 2015;
University President

Maintenance of Policy: Vice
President for Research and
Executive Director, Research
Institute

PURPOSE: This Business Ethics and Integrity Code provides a brief summary of the essential standards of business ethics and conduct that UD employees and consultants must follow as required by Federal Acquisition Regulation (FAR) 52.203-13 Contractor Code of Business Ethics and Conduct (Apr 2010).

SCOPE: This Business Ethics and Integrity Code applies to all University of Dayton (UD) employees and consultants who participate in sponsored research activities.

POLICY HISTORY:

Approved as amended
January 8, 2015

Approved as amended
October 2001

Approved in original form
June 30, 1998

REFERENCE DOCUMENTS:

1. Affirmative Action Policy
2. Equal Employment Opportunity Policy
3. Certification of Procurement Integrity
4. Confidentiality and Security of University Property
5. Conflict of Interest & Commitment Policy for Sponsored Research
6. Environmental Health & Safety/Risk Management
7. Intellectual Property Policy
8. Misconduct in Research and Scholarship Policy
9. Policy on Nepotism
10. Policy on Computing Ethics
11. Nondiscrimination and Anti-Harassment Policy
12. Policy on the Distribution or Sale of Materials and Solicitation of or by Employees
13. Drug-Free Workplace Policy
14. Policy Prohibiting Illegal, Fraudulent, Dishonest, and Unethical Conduct
15. Staff Dispute Resolution Policy
16. Financial Conflict of Interest

APPLICABLE FEDERAL REGULATIONS:

1. Federal Acquisition Regulation (FAR) 52.203-13 Contractor Code of Business Ethics & Conduct (Apr 2010)

POLICY:

Research excellence has been a tradition at the University of Dayton Research Institute (UDRI) since its inception in 1956. UDRI has an uncompromising commitment to provide customers with quality products while maintaining the highest moral and ethical standards.

UDRI is aware that compliance with applicable laws and regulations is an essential condition for performing our business. UDRI's commitment to compliance is based on providing a supportive environment, the integrity of our employees, and their support of the University's policies and applicable laws and regulations of the United States.

UD employees and consultants are expected to make themselves aware of and willingly comply with U.S. laws and regulations that are applicable to sponsored research. Employees are encouraged to seek guidance on applicable laws and regulations via this policy and from their supervisor or a member of the UDRI Business Ethics and Integrity Committee.

UDRI will provide ethics training to UD employees and consultants on a periodic basis and will monitor all operations to ensure compliance.

UD employees and consultants are expected to conduct all business activities in a manner consistent with recognized ethical standards. Employees and consultants who represent UD will be fair, honest, and forthright in all relationships with customers, suppliers, and peers.

Guidelines

All UD employees and consultants are expected to observe a basic code of conduct in the workplace that includes the following expectations:

- Business must be conducted in accordance with high ethical and moral standards.
- Employees and consultants must adhere to the spirit of the law and observe recognized standards of fair dealing and personal integrity.
- Employees must be dedicated and loyal to the University of Dayton and our country.
- Employees must be economical and ethical in using University and customer resources.
- Employees should neither condone nor approve any known illegal or unethical act for any reason, either willfully or through omission.

In addition, UD employees are expected to adhere to all established University of Dayton policies on related topics. Additional information on these policies can be found in the addendum to this code.

Procedure for Reporting Suspected Violations

Any UD employee or consultant who reasonably suspects or has actual knowledge of an impropriety, criminal misconduct, or violation related to UDRI's Business Ethics and Integrity Code that has been committed by a University employee or consultant is duty-bound to report this information in a timely manner. The reporting employee or consultant should contact his or her immediate supervisor, the next level of supervision, or a member of the UDRI Business Ethics and Integrity Committee with the pertinent information. UD employees and consultants are expected to act in the best interest of the University by ensuring that suspected violations are reported at the earliest possible opportunity. The following confidential means of communication are available for reporting suspected violations:

POLICY (continued):

To reach the Chair of the UDRI Business Ethics and Integrity Committee:

Call: UDRI Hotline at 937-229-4848 (secure line)

Write: UDRI – Office of Contracts and Grants

ATTN: Chair, UDRI Business Ethics and Integrity Committee

300 College Park

Dayton OH 45469-0104

Fax: 937-229-2291 (unsecure line)

To reach the appropriate government officials:

Call: Defense Hotline toll-free at 800-424-9098

Procedure for Investigating Suspected Violations

UD employees and consultants should use good judgment and a sense of fairness when reporting a suspected violation of the UDRI Business Ethics and Integrity Code.

Those reporting suspected violations and those suspected of a violation will be treated with dignity and respect. Those suspected of a violation will be presumed innocent until a fair hearing is conducted and a finding rendered.

All communications concerning a suspected violation and the identity of the reporting employee will be kept confidential to the extent possible.

The reporting employee may remain anonymous.

Concerns will be seriously addressed and action will be taken. A reporting employee who has identified himself or herself will be informed of the action taken. If the suspected violation is not resolved immediately, the reporting employee will be informed as the investigation proceeds.

No retaliation will be taken against employees who report suspected violations of UDRI's Business Ethics and Integrity Code. Any employee in a position of authority who attempts to impede or delay an investigation will be subject to disciplinary action up to and including termination of employment.

Attempts to use the UDRI Business Ethics and Integrity Code to libel, slander, or otherwise harm another individual through false accusations, malicious rumors, or other irresponsible actions are prohibited and may in and of themselves be reason for disciplinary action up to and including termination of employment.

Noncompliance

Anyone whose conduct is determined to have violated the UDRI Business Ethics and Integrity Code will be subject to disciplinary action up to and including termination of employment and may also be personally subject to other civil or criminal liabilities.

APPEAL PROCESS

Disciplinary actions resulting from noncompliance with this policy are covered under other policies (listed in the references to this policy) and any appeals would also be covered under those policies.