

WEBSTER UNIVERSITY EMPLOYEE ETHICS POLICY

PURPOSE

Webster University is committed to the highest ethical and professional standards of conduct as an integral part of its mission. Employees are expected to devote their best efforts to the interests of the University and the conduct of its affairs. To achieve this goal, the University relies on each community member's ethical behavior, honesty, integrity, and good judgment.

APPLICABILITY

This Policy applies to all employees of the University.

POLICY

Each community member shall adhere to generally accepted ethical and professional standards in conducting the business and affairs of Webster University. Each community member shall also demonstrate respect for the rights of others and accept accountability for his or her actions.

The University and each community member must transact University business in compliance with all laws, regulations and University policies related to their positions and areas of responsibility.

Business dealings that create a conflict between the interests of the University and an employee are unacceptable. Even the appearance of a conflict of interest should be avoided. Conflicts of interest or the appearance of conflicts of interest can occur when an employee or family member has a financial investment in a company that supplies products or services to the University. Potential conflicts can also exist when an

employee or family member serves as an officer, director or consultant for a company that acts as a supplier for the University. A conflict may also occur when an employee receives gifts of substantial value from a supplier or potential supplier.

The University recognizes the right of employees to engage in activities outside of their employment that are of a private nature and unrelated to University business. However, a full disclosure of potential conflicts of interest to an employee's immediate supervisor must be provided to assess and prevent conflicts of interest from arising.

Employees are required to maintain the confidentiality of information entrusted to them by the University, students, associates, and the public and to comply with the requirements of the Family Educational Rights and Privacy Act (FERPA). Confidential information should be shared only on a need to know basis or when disclosure is authorized or legally mandated.

Actions involving theft, fraud, embezzlement, kickbacks, misappropriation of funds or assets, falsification of records, conflicts of interest, breach of confidentiality and other improprieties are in direct violation of this policy.

Managers and supervisors are responsible for implementing and monitoring compliance with this policy in their areas.

Any violations or suspected violations of this policy should be reported to the appropriate Vice President or the Director for Human Resources. No employee will be subject to any disciplinary or retaliatory action for reporting a violation or potential violation of this

policy. However, filing known false, malicious reports will not be tolerated and anyone filing such reports will be subject to appropriate disciplinary action.

Any violations of this policy are subject to disciplinary action ranging from a reprimand to dismissal. Criminal prosecution is also possible in appropriate circumstances.

This Policy is effective August 10, 2005.