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Charles R. Drew University of Medicine and Science



EMPLOYEE HANDBOOK*

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* Excludes faculty-specific policies published by other entities.

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Conflict of Interest

It is the University's policy to forbid Employees from having a financial interest in any other business that competes with the University, except where such ownership consists of securities of a publicly owned corporation regularly traded on the public stock market. The University's policy also forbids engaging in, directing, managing, or consulting for a business or businesses that compete with the University without the express written consent of the President or his or her designate. If an Employee thinks that there is a possibility that they may have a conflict of interest, it is the Employee's responsibility to notify the Director of Internal Audit and request approval before becoming engaged in outside activities or relationships that could violate this policy.

Employees are required to complete a conflict of interest statement at hire and annually thereafter and disclose any potential conflicts of interest from other employment or other sources, including holding a financial interest in companies doing business with the University. Failure to disclose a conflict of interest or falsification of this statement may be ground for disciplinary action up to and including termination.

Employment of Relatives

The University may employ qualified relatives of existing Employees as long as such employment does not involve a supervisor/subordinate relationship between relatives and does not create a real or perceived conflict of interest or result in harassment or discrimination.

An employment decision shall not be based on whether an individual has a spouse presently employed by the employer except in accordance with the following criteria:

- For business reasons of supervision, safety, security or morale, the University may refuse to place one spouse under the direct supervision of the other spouse.
- For business reasons of supervision, security or morale, The University may refuse to place both spouses in the same department, division or facility if the work involves potential conflicts of interest or other hazards greater for married couples than for other persons.
- If co-employees marry, the University shall make reasonable efforts to assign job duties so as to minimize problems of supervision, safety, security, or morale.

For purposes of this policy only, relatives include the following:

- Spouse or Registered Domestic Partner
- Parent
- Child
- Sibling
- Grandparent or Grandchild
- Aunt or Uncle
- Cousin
- Niece or Nephew
- In-laws
- Step relations
- Individuals residing in the same household as a current Employee

Employees in supervisor/subordinate relationships who marry, become related by marriage or otherwise become involved in close personal relationships while employed by the University will also

be subject to the provisions of this policy. Employees are required to disclose such relationships to the University so that appropriate action consistent with this policy may be taken.

The policy applies to all categories of employment, including Full-Time, Part-Time, Temporary, Seasonal and to Independent Contractor classifications.

Ethical Behavior

The University has policies in place addressing expectations of its Employees on ethics, including, but not limited to, its policies on computer e-mail and Internet use, confidentiality, conflict of interest, harassment and trading in securities. Employees must read, become familiar with, and abide by these policies at all times.

The University insists that Employees maintain the highest possible ethical standards in their dealings with students, faculty members, vendors, suppliers, competitors, co-workers and the public in general. The integrity, reputation and profitability of the University ultimately depend upon the individual actions of each Employee. Employees in all jobs and at all levels should strive at all times to conduct the University's business in a fair, ethical, forthright and lawful manner. Failure to adhere to the ethical behavior policy may result in disciplinary action, up to and including termination.

If an Employee is aware of a violation of a state or federal law by any officer, manager or Employee of the University, the Employee must report the violation to a member of management or use the University's anonymous Alert Line to report the incident as soon as possible (see below). Management will conduct an internal investigation and, if appropriate, report the incident to a law enforcement agency. The University will not take any adverse employment action against any Employee who reports a violation of the law to management. Such retaliatory action by any manager, supervisor or Employee will result in disciplinary action, up to and including termination.

If an Employee is unsure as to whether they or someone else in the University may be in violation of this policy, they should discuss the circumstances with a supervisor or the Vice President, Administration.

Alert Line – Integrity in Action

The University believes that its Employees are its most valuable assets. Employees deserve to work in a positive, productive environment, and the University will do its best to provide that

atmosphere. Reaching that goal requires commitment from all Employees to the University's values and ethical standards. Integrity is a priority in everything the University does.

Employees are expected to recognize harmful activity. Some common examples include:

- o Conflicts of interest
- Auditing or accounting irregularities
- Theft and fraud
- Misuse of assets
- Code of Conduct violations
- Improper dealings with students or vendors
- Creating or ignoring safety hazards
- On-campus use or sale of illegal drugs

If an Employee sees or suspects unethical, illegal or unsafe activity, it should not be ignored – inform the University by:

- 1. Talking to a supervisor. The supervisor should be the Employee's first point of contact.
- 2. If the Employee doesn't feel comfortable speaking to a supervisor or other management official, Employees should call The Network* toll-free, 24 hours a day, 7 days a week. Employees can call anonymously.

1.800.716.9007 or www.MySafeCampus.com

Employees can call any time, from any location and DO NOT have to give their name.

The Network is an independent company that provides hotline services for organizations worldwide. This service is not intended to serve as a substitute for speaking directly with a University supervisor or manager.

Gifts and Gratuities

In order to avoid a conflict of interest or the appearance of such a conflict, Employees may not request or accept any gift or gratuity worth more than \$50 from a vendor, supplier or student without the express written authorization of the Vice President, Administration. Occasional gifts from vendors, suppliers or students of minimal value (such as flowers, cookies, candy) may be accepted. Employees should not accept invitations to lavish hosted entertainment when such invitations may present the appearance of conflict of interest.

Outside Employment

There are times when Employees have the opportunity or the need to hold two (2) or more jobs with separate Employers at one time. It is important that a second job position does not interfere in any way with an Employee's primary job position with the University. An Employee should be careful that extra hours of work with a second Employer do not affect the safe operation or accurate performance of the job position with the University, or leave them tired or slow to react. If a second job position could create a potential conflict of interest, the Employee is required to obtain written approval, in advance of accepting the second job position from the President of the University or his or her designate.