

Employee Codes of Conduct University of New England

INTRODUCTION:

The University of New England (UNE) establishes standards of conduct for all employees, based on a commitment to compliance by the University's senior administration, and its departments. These standards of conduct convey UNE's commitment to comply with all federal and state standards, with an additional emphasis on preventing fraud and abuse.

All UNE administration, faculty, medical staff, employees, are expected to:

- Conduct UNE business in good faith and with integrity and honesty;
- Strive to maintain a working knowledge of all current laws, rules and regulations related to his/her job responsibilities, and to conduct business in strict compliance with them;
- Observe non-disclosure of and protect against disclosure of confidential and/or proprietary information gained by reason of his/her official position, and not to engage in any activity or otherwise use such information for his/her personal gain/benefit both during and subsequent to the employment relationship, including taking appropriate steps to protect such information from unauthorized use or disclosure, further including, but not limited to, disclosure to family, friends or acquaintances;
- Not engage in any activities that discriminate against persons on the basis of race, color, national origin, gender, sex, age, religion, disability, veteran status, sexual orientation or any other basis prohibited by statute. This includes, but is not limited to activities in student admissions, student housing, employment, financial aid, University Health Services, and educational services;
- Not have any direct or indirect interest, financial or otherwise, that is in conflict with the proper discharge of his/her official duties;
- Not conduct any business, in his/her official capacity, with any business entity of which employee is an officer, agent, or member, or in which the employee or a member of his or her immediate family owns a substantial interest;
- Not make personal investments which could reasonably be expected to create a substantial conflict between the employee's private interest and the interest of the University or any of its divisions;
- Not pursue outside business and professional opportunities that compete with the interests of the University of New England. Employees have a responsibility to bring these opportunities to the University's attention;

- Not accept other employment or compensation which could reasonably be expected to impair the employee's performance of or his/her independence of judgment in the performance of the employee's duties for the University;
- Disclose all potential conflicts of interest to the employee's immediate supervisor or the Chief Compliance Officer;
- Not intentionally or knowingly misapply or misappropriate any asset, property, or "thing of value" belonging to the University;
- Not accept, solicit or agree to accept or solicit any gift, favor, service or entertainment that might reasonably tend to influence the employee in the discharge of his/her official duties or that the employee knows or should know is being offered with the intent to influence his/her official conduct;
- Not solicit, accept, or agree to accept or solicit any benefit for having exercised his/her official powers or performed his/her official duties in favor of another;
- Not accept, solicit or agree to accept or solicit any gift, favor, service or entertainment from or to a public official. Various laws strictly control the giving of gifts to and the entertainment of public officials. The illegal or improper giving of gifts or entertaining can result in fines, imprisonment or both for the employee as well as the official;
- Not intentionally make false or misleading statements in any UNE document;
- Promptly notify the UNE Chief Compliance Officer and/or any relevant UNE Compliance Officer of any inquiries for information from any local, state, or federal government agency regarding compliance with mandated laws or regulations
- Report, within a reasonable time, suspected violations or questionable conduct that may violate applicable federal, state or local laws, or UNE policies or procedures. Reporting may be done through established reporting channels, to the UNE Chief Compliance Officer, or through the **UNE Toll Free Compliance Hotline 866 587-6636**;
- Not engage in retaliation or any form of harassment directed against an employee or faculty member who reports a wrongdoing or possible wrongdoing;
- Promptly notify the UNE Chief Compliance Officer and/or any relevant UNE Compliance Officer of any inquiries for information from any local, state, or federal government agency regarding compliance with mandated laws or regulations;
- Cooperate fully, subject to the direction of the University's assigned legal counsel, with all authorized inquiries or investigations related to any suspected violation of the UNE Compliance Plan or Codes of Conduct, or any applicable federal, state, or local laws;
- Collect only those amounts to which the UNE is entitled for any type of reimbursement and promptly refund amounts billed and/or collected in error;
- Adhere to all required practices regarding expenses and reimbursement when engaged in travel on official business of the institution;
- Adhere to any and all policies not stated here, but set forth in the current Compliance Plans of individual units, Codes of Conduct established in the UNE Faculty Handbook, Personnel Handbook, and/or Student Handbook, and or guidelines from the Office of the Inspector General (where applicable).

- Avoid or report any conflict of interest with their responsibilities to UNE. Employees are encouraged to participate in outside activities that benefit the community and to exercise their political and civil rights. The University supports involvement in other non-profit activities. However, employees should not participate in outside activities, including outside directorships and fiduciary appointments, which create or are likely to be perceived as creating a conflict of interest with their responsibilities to the University of New England. Outside directorships are only appropriate when the organization has no relation to the University or when its policies ensure nonparticipation of the employee in business decisions regarding its relationship with the University.