



REED COLLEGE

OFFICE OF THE TREASURER

Conflict of Interest Policies

STAFF

Approved by the Board of Trustees April 22, 1995

The policies in this section are applicable to College personnel other than trustees, officers and faculty. The College recognizes that the good judgment of its staff is essential, and that no list of rules or guidelines can provide direction for all the varied circumstances that may arise.

Guidelines.

Each staff member has a duty to act in the best interests of the College.

Staff members who have, directly or through family or business connections, an interest in suppliers of goods or services, or in contractors or potential contractors with the College, should not undertake to act for the College in any transaction involving that interest. No staff member shall participate in the selection, award or administration of a contract with any party with whom he or she is negotiating respecting potential employment or has any arrangement concerning potential employment.

Staff members shall avoid outside employment or business activity involving obligations which may in any way conflict, or appear to conflict, with the College's interests, including its interest in the full- or part-time, as the case may be, services of its staff members. Directorships or consultation arrangements for which the staff member will receive compensation should be cleared with the staff member's responsible vice-president who shall consult in each instance with the Vice-President/Treasurer of the College.

Each staff member shall provide full disclosure of any business or financial enterprise or activity in which he or she is involved which might influence, or might appear to have the capacity to influence, his or her official decisions or actions on College matters. Disclosure shall be in writing tendered to the staff member's vice-president who shall consult in each instance with the Vice-President/Treasurer of the College. Link to disclosure form [here](#).

Staff members shall refrain from personal activities, including but not limited to the purchase or sale of securities, real property or other goods or services, in which they could use, or might appear to have the opportunity to use, for personal gain, confidential information or special knowledge gained as a result of their relationship with the College.

Each staff member shall refrain from unauthorized disclosure of nonpublic information concerning the College's intentions, its investments, its property development, sale or acquisition, its purchasing or its contracting activities.

No staff member shall make unauthorized use of College resources for his or her personal benefit or for the benefit of any other person.

It is sound practice to discourage personal gifts and favors from people with whom the College has a business relationship. Personal gifts of more than nominal value should be tactfully declined or returned, to avoid any appearance or suggestion of improper influence. Those staff members involved in the awarding or administration of contracts using federal or other governmental funds should keep in mind that they are prohibited by law from soliciting or accepting gratuities, favors or anything of monetary value from contractors or potential contractors.

No staff member shall act in any College matter involving a member of his or her immediate family including but not limited to matters affecting such family member's employment, evaluation or advancement in the College, without first making full disclosure in the manner described in subparagraph iv above. Such disclosure shall include the nature of the familial relationship and the impact or potential impact of the staff member's action on such family member.

In any case in which a staff member believes that his or her conduct or activities may conflict with these guidelines, may appear to conflict with these guidelines or may otherwise create a conflict of interest or the appearance of a conflict of interest, the staff member should disclose the details of his or her situation in the manner described in subparagraph iv above.