

## CONFLICT OF INTEREST POLICY STATEMENT

It is the University of Hartford's policy, initiated by the Board of Regents and currently in full force and effect, to respect the rights of its employees to invest in private enterprise and engage in outside activities of a private nature with the understanding that, in all facets of their duties with the University, employees are expected to act in the best interest of the University, to the exclusion of considerations of personal preference and private gain. To ensure conformity with this policy, the Officers have concluded it is proper to set forth in writing the University's policy regarding conflict of interest.

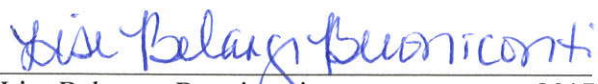
A potential conflict of interest exists whenever an employee or any member of his/her family has a financial interest in, or any connection with, an enterprise that does business with the University if the employee is in a position, either directly or indirectly, to make or influence decisions concerning transactions with such outside enterprise. Good judgment is key to the effective and fair implementation of any conflict of interest policy.

This is a statement of University policy as established by the Board of Regents in regard to conflicts of interest and business ethics. It is not intended to cover detail, but serves only as a general guide. Every employee is responsible for being aware of the importance of personal conduct and the University places its basic reliance on the integrity, good judgment and high ethical standards of the employee. Management reserves the right to determine when an employee's activities bring about a conflict with the University's best interest and to take whatever action is necessary to resolve the situation. That action can include progressive discipline, up to and including termination of employment.

Presented below are some, but not all, of the cautions and concerns University employees must consider:

- a. An employee should not be in a position to gain from the present or potential dealings of the University with suppliers, contractors or service organizations.
- b. Buying, renting or selling property, facilities, equipment or services to the University by employees of the University must have prior approval from the appropriate Officer.
- c. No University employee should accept, either directly or indirectly through his/her family or friends, gifts (other than those of nominal value) or other considerations from firms or individuals doing or seeking to do business with the University.
- d. Outside activities of University employees should not interfere with their University duties, time schedules or normal participation in appropriate University events.
- e. All compensation of University employees for any and all services rendered to the University, and in recognition of past, present or future services to the University, is the responsibility of the direct supervisor of the employee in question. No gift (other than those of nominal value), gratuity or additional compensation may be given to, or accepted by, a University employee without the knowledge and express advance approval of that individual's direct supervisor and such other officials as would normally be involved in compensation decisions relating to the individual in question.

Where there is any question of interpretation of the above policy, employees should first consult with their supervisor. If there is still any reasonable doubt as to the proper action, the full situation should be presented to the Office of Human Resources Development for review and further action.



Lisa Belanger-Buoniconti

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Executive Director

Human Resources Development