

CODE OF BUSINESS CONDUCT

This code of conduct is intended to be a general guide to the behavior expected of members of the University of Portland community. It cannot and does not address every possible situation, but may be used as guidance for determining right action. In the event that law is in conflict with this policy, the law supersedes the policy. The Vice President for Financial Affairs is the University's compliance officer. Any questions about this code, related policies or specific actions should be addressed to your supervisor or University administration in the manner described on the University web page: [Workplace Concerns and Grievances](#). This page includes information on how to report concerns confidentially. The University will protect those who report concerns ("whistleblowers") against retaliation, with the limitation that this protection does not include immunity for any personal wrongdoing that is alleged and investigated.

Employees, Regents and all other members of the University Community are expected to:

- 1. Comply with applicable laws, rules and regulations.** It is the duty of each employee to be familiar with the regulations applicable to his/her position, to comply with those regulations, and to report to the compliance officer any suspected regulatory violations by employees or agents of the University.
- 2. Avoid and disclose conflicts of interest.** A conflict of interest is a situation in which the personal interest of an employee (or an employee's friend or relative) may interfere with ability of the employee to work in the interest of the University. It is the duty of each employee to disclose any circumstances that might give rise to an actual *or perceived* conflict of interest and to avoid conflicts when possible.
- 3. Behave in a welcoming and respectful manner free from discrimination and harassment.** Respect for others is the cornerstone of our code of business conduct. Any behavior that intimidates, discriminates, harasses, or makes other members of our University community feel unwelcome or disrespected is unacceptable. It is the duty of each member of the University community to be welcoming and respectful to others, and to report to the compliance officer any suspected violations of this policy by employees or agents of the University.
- 4. Maintain confidentiality.** It is the duty of each employee to adhere strictly to laws (FERPA, etc.) and contractual terms related to privacy and the control of information. Further, members of the University community should take all reasonable steps to keep confidential the personal information of our students, co-workers, donors and others, even when not required to do so by law. Press inquiries should always be directed to the Office of University Relations. Strategic business information should generally not be shared with outside parties. *This duty continues after employment ends.*
- 5. Be fair, honest and responsible.** Employees are expected to be honest and accurate in time and expense reporting, and responsible in the use of University resources and in the giving and receiving of entertainment and gifts so as to avoid conflicts of interest or the attainment of unfair advantage. While we seek value in our business transactions, we do not take unfair advantage of others.
- 6. Know and adhere to University policies including those in the [University Website](#).**
- 7. Refrain from political activity in any University capacity or with University resources.**