Washington University Conflict of Interest Policy

Employees and students conducting business on behalf of the University have a responsibility to do so in a manner that is objective and ethical. The goal of all such business dealings must be to benefit the University. The following policies apply:

1. University employees and students will conduct University business ethically and objectively, in compliance with all applicable laws, regulations and University policies, including the University's Code of Conduct.
2. Employees and students must not accept gifts, entertainment, meals or travel that might directly or indirectly influence the employees’ business judgements or decisions, or that might give the appearance of impropriety.
3. The University intends to avoid any unnecessary costs that are the result of gifts from suppliers given to employees and students.
4. The University provides equal opportunity to firms wishing to pursue business relationships.
5. The purchase of goods or services using University or sponsored funds from a privately-held business in which a student, faculty, staff member or his/her spouse, partner or child (dependents) has a financial interest (investment, ownership, employment or consulting relationship in the business), or may directly benefit from such purchase, is a potential procurement conflict of interest, and the following policy points apply:
   - Such potential purchase situations must be disclosed as soon as they are contemplated and prior to purchase using the Procurement Conflict of Interest Disclosure Form. The form should be submitted to the Department Heads of both the employee or student that is potentially conflicted and the disclosing employee or student; and to the University's Associate Vice Chancellor for Resource Management for review and approval/disapproval.
   - If a Department Head or his/her spouse, partner or child (dependents) is the potentially conflicted party, the proposed purchase must be disclosed to the respective Dean and the Associate Vice Chancellor for Resource Management for review and approval/disapproval.
   - Resource Management will review the proposed vendor's qualifications, obtain competitive bids (if possible), and consult with other appropriate University departments as needed prior to an approval decision.
   - Employees and students should never be part of decisions (including the selection process) to purchase goods or services from privately held companies in which they or their spouse, partner or child (dependents) have financial interests.
   - Even when a potentially conflicted employee or student is unaware of or uninvolved in a proposed purchase decision by his/her department, if the existence of the employee’s or students’ potential procurement conflict of interest is known by the Department Head or others in the department, prior approval of the purchase must still be sought from the Department Head (or Dean, if the Department Head is the potentially conflicted party) and the Associate Vice Chancellor for Resource Management.
   - The above requirements pertain to all University purchases of goods or services, regardless of whether they are expected to be purchased through purchase orders, check requests, personal reimbursements, contracts, service agreements, reverse service agreements, procurements cards, or any other method.
6. Any promotional benefits that result from a business transaction will be provided to the University (or one of its departments) and not to an individual employee or student.

7. Employees and students may not accept any sum from any supplier attempting to “reward” the employee or student for the decision to do business with the supplier. Any acceptance of such sums, or kickbacks, will result in termination of employment or expulsion (and possible legal action); and in the termination of the business relationship with the supplier.

8. While conducting University business, employees and students may encounter offers of gifts from suppliers. The following guidelines apply:
   - Offers of gifts should generally be refused.
   - While there may be occasion to accept such gifts (for example company promotional trinkets, e.g., pens or note pads), these or other gifts should not be accepted in return for a business favor.
   - Gifts of cash or monetary gifts of any kind or amount may not be accepted by employees or students. Personal loans of any kind should never be accepted by employees or students.
   - The cumulative value of gifts received from all suppliers in total should not exceed $75 in any 12-month period.
   - Employees and students should review with their supervisors any offers of gifts.

9. Business Entertainment – In conducting University business, employees and students may from time to time be invited by a supplier to attend a sporting event, cultural activity or other entertainment event. It may be appropriate for employees and students to accept such offers according to the following guidelines:
   - The supplier is in attendance and business will be conducted at the event.
   - The value of the entertainment is reasonable and not excessive.
   - Employees’ and students’ business judgements and decisions will not be influenced by the entertainment or by the expense involved in the entertainment.
   - The entertainment offer is from a supplier with whom the University has an existing relationship or contract.
   - The entertainment offer is not made during a time period where proposals or bids are being sought to establish a new contract.
   - Entertainment offers should not be accepted with routine frequency.
   - Employees and students should review with their supervisors any offers of business entertainment.

10. Business Meals – In conducting University business, employees and students from time to time may find it appropriate to do so in conjunction with meal times. While employees and students should not routinely plan business meetings around meal times in order to be the recipient of a “free” meal, it may not be inappropriate for employees and students to accept such a meal from suppliers. The following guidelines should be observed:
   - Business will be conducted at the meal.
   - Employees’ and students’ business judgements and decisions will not be influenced by the meal or by the expense involved in the meal.
   - Employees and students who are so authorized should occasionally, at the University’s expense, pay for the meals, including the suppliers’ meals.
   - Employees and students should review with their supervisors any offers of business meals.

11. Business Travel – In conducting University business that requires out-of-town travel, employees and students may receive offers from suppliers to pay for transportation, lodging and meals. It may be appropriate for employees and students to accept such offers according to the following guidelines:
   - The supplier will be at the travel destination.
   - Business is the sole reason for the travel.
• The supplier will pay only for the employees’ and students’ transportation, lodging and meals, not for employees’ and students’ family members or other traveling companions.

12. Employees and students who are uncertain about whether or not to accept any offer from a supplier are advised to not accept the offer if there are any doubts at all. Supervisors should be made aware of all offers made to employees and students. In turn, supervisors should contact the University’s Associate Vice Chancellor for Resource Management to discuss any questionable offers and any known violations of this policy.

13. University employees and students are not allowed to use Washington University purchase orders, check requests or the Procurement Card to make personal purchases, even if the intent is to repay the University at a later time.

Conflicts of interest may occur when an employee or student or immediate family member receives personal financial benefit from the employee’s or students’ University position in a manner which may inappropriately influence the employee’s or students’ judgment or compromise the employee’s or students’ ability to carry out University responsibilities or could be a detriment to the University's integrity. Employees and students with an apparent or real conflict of interest must complete this form and deliver it to the associated department director. Completed forms must be forwarded to Resource Management.