An officer, manager, faculty or staff member shall be considered to have a conflict of interest as to any transaction if (a) such individual has an actual or potential financial or other interest which impairs or might reasonably appear to impair such individual's independent, unbiased judgment in the discharge of his/her responsibilities to the University, or (b) such individual is aware that a member of his/her family (which for purposes of this Policy shall be a spouse, parent, sibling, child or any other relative residing in the same household as the individual) or any organization in which such individual (or member of his/her family as previously defined) is an owner, director, officer, employee, member, partner, trustee, has such existing or potential financial or other interest.

All officers, management, faculty and other personnel involved in potentially sensitive areas, such as account executives, purchasing, auxiliary services and grants management, shall disclose to the University's Secretary any potential conflict of interest at the earliest practical time. The conflict of interest must be resolved in a timely fashion. The University’s Secretary will make the Audit Committee aware of any conflicts of interest that cannot be resolved in a prompt manner, and at least annually will report to the Audit Committee all matters of a conflict of interest that have been timely resolved. No individual shall enter into any transaction on behalf of the University when such transaction may involve a conflict of interest. If the University’s Secretary is involved, the matter should be reported directly to the Chairman of the Audit Committee. If the Chairman of the Audit Committee is involved, the matter should be reported directly to the Chairman of the Board of Trustees.

A conflict can also occur if an employee has a continuing relationship with any other entity engaged in the delivery of educational or other services that fall within the scope of the University’s activities or which may influence the exercise of their professional judgment on behalf of the University.

The Audit Committee has the responsibility to inform the Board of Trustees with respect to matters of a conflict of interest. The facts should include: what benefits could flow to the individual; the present financial position of the individual's entity; whether the University's relationship stands on equal or preferential footing relative to others similarly engaged with the entity; and, whether, in the absence of the relationship, the University would enter into the transaction. The employee shall not use their personal influence, directly or indirectly in the matter.

The Audit Committee must bring any conflict of interest that cannot be timely resolved to the Board of Trustees. The Board must decide whether the transaction is "fair" and is not a deviation of "normal" business practices or procedures and the individual is not being unreasonably compensated or rewarded. The Board's review of the material facts and its resulting decision must be documented through a formal resolution contained within the minutes of the meeting. The Executive Committee may act on behalf of the Board in this area.
When at any time a matter requiring action arises, which is in the area of supervision or decision making of a member of either the officers, management, faculty or staff and involves that person in a real or apparent conflict of interest, it shall be the responsibility of the respective person to disclose such relationship, interest, or other circumstances, and all related material facts promptly and completely to the University’s Secretary or to the Chairman of the Audit Committee.

It is essential to the administration of this policy that the officers, management, faculty and key staff members of the University review and respond to the policy upon employment or appointment to their position and at least annually thereafter. Each year, on behalf of the Audit Committee, the University’s Secretary will forward to the officers, management, faculty and other personnel involved in potentially sensitive areas, such as account executives, purchasing, auxiliary services and grants management, a copy of the University’s Conflict of Interest policy. The Secretary will ensure each individual reviews the policy, and responds that they have read and agree to abide by it. In addition, at this time each individual will indicate whether they have, currently or during the past year, to the best of their knowledge, any potential or real conflicts of interest. The University’s Secretary will review the responses and attempt to resolve any significant conflicts with the individual. If the conflicts cannot be immediately resolved, the matter should be communicated to the Audit Committee until fully resolved. The University’s Secretary should compile a list of conflict of interest matters that were resolved in a timely manner and annually present this report to the Audit Committee.

Please describe below any relationships, transactions, or positions you hold (volunteer or otherwise), or circumstances that you believe could create a conflict of interest, now or in the future, between DeSales University and your personal interests, financial or otherwise:

_______ I have no conflict of interests to report.

I have the following conflict of interests, or potential conflicts of interests, to report:

1. ___________________________________________________________

2. ___________________________________________________________

3. ___________________________________________________________

The undersigned, an employee of DeSales University, acknowledges receipt and review of this Conflict of Interest Policy. The undersigned agrees to comply with this Conflict of Interest Policy, has disclosed any applicable conflicts in the space above, and understands that it is the employee’s obligation to disclose a conflict of interest, or appearance of a conflict, to the University’s Secretary when a conflict, or appearance of a conflict arises.

_________________________________________________________________

Printed name: ____________________________

Date: ____________________________