

**TEMPLE UNIVERSITY**  
**BOARD OF TRUSTEES**  
**POLICIES AND PROCEDURES MANUAL**

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**Title:** Conflict of Interest - All Employees  
**Policy Number:** 04.16.01  
**Effective Date:** December 13, 1983; as amended May 13, 2008  
**Issuing Authority:** Board of Trustees

**Scope of Policy**

It has been and shall continue to be the policy of Temple University that all full-time and part-time employees avoid any conflict, or appearance of conflict, between their personal interest and the interest of the University in dealing with any organization or individual having, or seeking to have, any business relationship with the University or with any organization or individual whose objectives or interest may be adverse to University interests. The following guidelines are adopted to achieve this policy.

**Definitions**

An employee shall be deemed to have a potential conflict of interest when:

- A. The employee is an officer, director, trustee, partner, employee or agent of, or has a 5% or greater interest in, a person or an entity involved in a transaction with or affecting the University; or
- B. The employee is aware that the employee's spouse or any of their parents, brothers or sisters, or relatives is an officer, director, trustee, partner, or agent of, or has a 5% or greater interest in a transaction with or affecting the University; or
- C. Without regard to (A) or (B) above, the employee's independent judgment is or might appear to be impaired by an existing or potential financial interest; or
- D. An employee supervises or participates in a decision affecting a relative of the employee.

**Policy**

Before an action is taken by an employee with or on behalf of the University, where an actual or potential conflict of interest may exist, the employee will:

- A. Promptly make full disclosure to the employee's supervisor; and
- B. Refrain from acting until the employee has received written approval from the cognizant University officer and the University Counsel that such action is appropriate.

The employee's immediate supervisor will coordinate the subordinate's conflict of interest concerns with the budget unit head and University officer responsible for the action and the University Counsel.

The University Counsel will be responsible for consistently interpreting the University's conflict of interest policy.

If the employee is a Vice President or a University officer, or an employee that reports to the President, full disclosure to and approval of the President is required.

#### IMPLEMENTATION/PROCEDURE:

1. If an employee is uncertain as to whether or not a given transaction is deemed to have a potential conflict of interest, each employee will, through the employee's immediate supervisor, seek advice in writing from the University officer responsible for such transaction.
2. Each employee shall provide the employee's immediate supervisor with a written list of all business, charitable and other relationships, with a short description of the nature of each, for which there is reason to believe that the transaction might be with or affecting the University. The immediate supervisor shall provide a copy of the statement to the University officer to whom the supervisor reports.
3. The Human Resources Department shall provide a copy of the Policy Statement to each employee upon employment by the University and annually thereafter during the month of January.

#### Notes

**1. Dates of official enactment and amendments:**

Adopted by the Board of Trustees on December 13, 1983.

Updated and amended on May 13, 2008.

**2. History:**

The May 13, 2008, amendment changed names to reflect current practice.

**3. Cross References**

Board of Trustees Policy #01.35.01, Conflict of Interest – Trustees and Hospital  
Governors

Board of Trustees Policy # 04.16.02, Conflict of Interest – Faculty

Board of Trustees Policy # 04.16.03, Gifts and Conflict of Interest - All  
Employees