



GUIDELINE FOR BUSINESS CONDUCT

I. PURPOSE

The purpose of this policy is to provide direction to those involved in conducting the business and educational affairs of the University and to reaffirm the high ethical standards of the University with respect to conflicts of interest and the overall conduct of those who may act or speak on behalf of the University in connection with its business affairs.

II. COVERAGE

This policy applies to all trustees, officers, faculty members, employees and anyone else associated with or doing business on behalf of the University. This guideline document applies to the business affairs of Mount Mary University.

III. POLICY STATEMENT

- A. Conflicts of Interest. All trustees, officers, faculty members, employees and representatives of the University should refrain from activities, including personal investments, which conflict with the proper discharge of their concurrent responsibilities to the University or impair their ability to exercise independent judgment with respect to the transactions in which they are involved on behalf of the University. Purchases and sales of goods and services as well as investments and the general provision of educational services made at or on behalf of the University are to be made on the basis of merit and without favoritism. All covered by this policy must be vigilant in identifying and reporting actual and potential conflicts of interest. The following rules have been adopted to implement this policy:
1. The University's purchases and sales of goods and services and making of investments are to be carried out so they do not result in personal benefit or gain to those who represent the University. These transactions should be in the best interest of the University and on a competitive basis, where possible.
 2. Gifts, favors, entertainment, hospitality, or other gratuities from persons doing business or seeking to do business with the University must be subject to strict scrutiny. Individuals covered by this policy must never accept, directly or indirectly, items that, because of their size or type, might reasonably be considered tendered for the purpose of influencing independence of judgment.
 3. No funds may be used for rebates, kickbacks, bribes or any other unlawful purposes. Those individuals covered by this policy must not make any payment or provide any gift, which would create a conflict of interest for the recipient or impair his or her independence of judgment.
 4. Significant transactions by or on behalf of the University with the University's trustees, officers, faculty members or employees, or their close relatives or enterprises in which they have material interests are not permitted unless such transactions and the potential conflicts are fully disclosed and have been approved by the Board of Trustees or an authorized committee thereof.
 5. Trustees, officers, faculty members and those employees of the University in a position to conduct significant transactions on behalf of the University must disclose to the University any organizational relationships and affiliations, which reasonably could give rise to a conflict of interest involving the University. These disclosures must be updated as often as necessary to ensure that the University possesses accurate information on a timely basis. For purposes of this policy, a reportable affiliation exists if a trustee, officer, faculty member or significant employee or a close member of his or her family:

- (a) is an officer, director, trustee, partner or agent of such organization; or
- (b) is the record or beneficial owner of more than 5% of the voting stock or otherwise has a controlling interest in such organization; or
- (c) has any other direct or indirect dealings with such organization from which he or she materially benefits.

B. Standards of Conduct

- 1. All trustees, officers, faculty members and employees shall strive to be in strict compliance with all applicable laws and regulations. It is essential that these individuals avoid creating even a suspicion or appearance of a violation.
- 2. All funds, assets, transactions, and payments received or made by or on behalf of the University must be properly and accurately evidenced on the University's books and records.
- 3. No University funds, services or paid employee time may be contributed to a candidate, political campaign or political party unless such activity is sanctioned by law and first approved by the President of the University.

IV. ENFORCEMENT; REVIEW

- A. Everyone associated with the University is expected to accept personal responsibility to act in accordance with both the letter and spirit of this policy.
- B. Any trustee, officer, faculty member or employee who discovers any event of questionable, fraudulent, or illegal nature, or any other event which is a violation of the foregoing policies and principles, is to report such deviation immediately to the President of the University or a member of the Board of Trustees.
- C. While this policy deals with the primary areas of concern, it cannot cover every situation that might arise. In specific situations, each person must exercise his or her own best judgment and discretion within the parameters of this policy, keeping in mind the high standards of trusteeship to which the University is committed. If anyone has the slightest doubt with regard to a particular transaction or any questions concerning this policy, that person should consult with the President of the University or any member of the Board of Trustees.
- D. A copy of this Guideline has been provided to all covered thereby. This Guideline shall be reviewed annually by the Board of Trustees or a committee thereof, and amended as necessary.

Version Approved by Board of Trustees, October 2003

**DISCLOSURE FORM
FOR TRUSTEES AND INSTITUTIONAL OFFICERS**

Attached is a copy of the Mount Mary University Guideline for Business Conduct. Please review it, complete this disclosure form, and return it to the President's Office, Mount Mary University, 2900 N. Menomonee River Parkway, Milwaukee, WI 53222. You may also return a signed copy electronically to salounp@mtmary.edu . Thank you.

Are you aware of any relationship or affiliation involving you or a close family member that reasonably could give rise to a conflict of interest as stated in Section III (A) of the Guideline?

YES_____ NO_____

If yes, please describe below the potential or actual conflict. If the conflict involves a gift or loan of the variety prohibited by the Guideline, please identify the gift or loan, including its source and approximate value.

I certify that the above information is accurate and true to the best of my knowledge.

I agree to abide by the Mount Mary University Guideline for Business Conduct in connection with my activities on behalf of the University.

I agree to advise the University if changing circumstances make the above answers no longer true.

Signature Date

Name (please print)