



CONFLICT OF INTEREST POLICY

The Wesley College STEM UR-CATS (Undergraduate Research Center for Analytics, Talent, and Success) Sponsored Programs expects its employees to conduct business according to the highest ethical standards of conduct, especially when administering external grant funds. Employees are expected to devote their best efforts to the interests of the College. Business dealings that appear to create a conflict between the interests of a College entity and an employee are unacceptable. The College recognizes the rights of employees to engage in activities outside of their employment which are of a private nature and unrelated to official college business. However, the employee must immediately disclose any possible conflicts to the cabinet administrator, so that the College can assess and prevent potential conflicts of interest.

According to College policy, a possible conflict of interest exists if an employee (or their family member):

- Has an existing or financial or other interest which impairs, or might appear to impair, that person's independent, unbiased judgment when performing responsibilities for the College.
- Has a significant business relationship with a person or firm engaging in, or seeking to engage in, business with the College.
- Has invested interest in an agency or organization where external grant funds are received or expected to be received.
- Has a significant ownership interest and may receive a financial or other benefit from knowledge or information confidential to the College.
- If a College trustee, cabinet member, key employee, or highly compensated professional is related to another individual in one of the above scenarios via a personal or professional relationship.
- If a College trustee, cabinet member, key employee, or highly compensated professional receives compensation from any other organization, whether tax exempt or taxable, in partnership with Wesley College through common supervision or common control.

Employees have an obligation to avoid conflicts of interest or any appearance of conflicts between their personal interests and the interests of the College. Conflicts of interest can arise because of circumstances alone (in appearance) without any action on the part of the employee. However, it is also important to recognize that in some cases the risk to all concerned is so small that the College may agree to accept the existence of the conflict with appropriate justification.

Conflicts of interest often relate to situations where an employee uses influence with the College for personal gain. The College expects that employees will refrain from personal activities which could cause or appear to cause a divided loyalty to the legitimate interests of the College. All trustees, cabinet members, and employees, because of their respective duties and responsibilities, will disclose to the College all business interests, affiliation, and/or relationships that could reasonably give rise to a conflict of interest involving the College. All real or potential conflicts of interest must be disclosed in writing to the respective employee's immediate supervising cabinet member at the time that the real or potential conflict of interest arises. The signed, written disclosure detailing the conflict of interest will be retained in both the respective employee's departmental files as well as the cabinet member's office files. If an actual or potential conflict of interest is disclosed, the effected employee shall refrain from further participation in matters to which the conflict relates until the question of conflict has been resolved. The Director of Human Resources and appropriate cabinet member will review the applicable facts and issues surrounding the conflict, and collectively pursue resolution of the conflict after consulting legal counsel. As final dictation, the Wesley College President, in consultation with legal counsel, will review and determine the appropriate course of action for the arisen conflict of interest.