



Policies and Procedures Manual

Title: Business Code of Conduct
Policy Administrator: General Counsel
Effective Date: Feb-02-2018
Approved by: President of the College

Purpose:

This document sets forth the ethical obligations of Community Members (as defined below) in the use, operation and management of College finances, facilities and other resources.

Policy:

1.0 Overview

The College of the Holy Cross, as a Jesuit, Catholic institution of higher education seeks to build a community marked by freedom, mutual respect, and civility. The College is committed to excellence and integrity and strives to carry out its mission in accordance with the highest ethical standards and in compliance with all applicable laws, rules, and regulations. It is dedicated to educating students to live by the highest ethical standards in their personal, professional and civic lives. Inherent in these standards is the expectation that Community Members will carry out their duties in an ethical manner with honesty, integrity and respect for the rights of others.

2.0 Applicability

It is with these standards in mind that the College has established this Business Code of Conduct. It is intended that this Policy will guide the actions of community members in carrying out their roles and responsibilities with respect to the use, operation and management of College finances, facilities and other resources. This policy is applicable to all faculty members, staff, student employees and representatives, and individuals who may provide volunteer services to the College (collectively, "Community Members").

3.0 Ethical Standards

3.1 Confidentiality

In carrying out their various responsibilities at the College, Community Members may have access to sensitive and/or confidential information, whether or not specifically

labelled or identified as confidential and in whatever format (“Confidential Information”), including, but not limited to, personnel files, financial statements, reports, donor information, and student records. It also includes Confidential Information that third parties have entrusted to the College. Confidential Information may only be used by Community Members in the proper performance of their job and other responsibilities to the College. Community Members have an obligation to maintain all Confidential Information in the strictest confidence and store it securely to prevent unauthorized access. Confidential Information may not be disclosed to other Community Members or to individuals or organizations outside the College unless specifically authorized by an appropriate officer of the College or as required by law. Any Community Member who intentionally or inadvertently discloses Confidential Information to a third party must immediately notify the Information Security Officer. See also the Written Information Security Plan.

3.2 Compliance with Laws, Rules and Regulations

Community Members must conduct College business in compliance with all applicable local, state and federal laws, regulations, rules, ordinances and guidance. Community Members are responsible for understanding and complying with all applicable laws, rules and regulations that pertain to their areas of responsibility. If a Community Member has a question on the interpretation of a law or other legal requirement, they should consult with the Office of the General Counsel.

3.3 Compliance with College Policies and Procedures

Community Members shall perform their responsibilities in compliance with all College policies, rules and procedures. If a Community Member has a question on the application or interpretation of a policy, rule or procedure, they should consult with their immediate supervisor or the office responsible for issuing and enforcing the policy, rule or procedure.

3.4 Conflicts of Interest

A conflict of interest occurs when a Community Member’s direct or indirect personal interest is inconsistent with or interferes with the best interest of the College. Please refer to the [College’s Conflict of Interest Policy](#) for further information on conflict of interest limitations and reporting requirements. The College expects that all decisions made and actions taken by Community Members on behalf of the College are made for the sole purpose of advancing the best interests of the College without regard for personal gain or circumstance.

3.5 Protection and Proper Use of College Assets

Safeguarding College assets is of paramount importance. Any suspected incident of improper financial reporting, lack of financial or operating controls, significant accounting deficiencies, misappropriation of funds, theft or fraud, or the unauthorized use of College-owned equipment/assets, should be reported immediately.

3.6. Use of College Property and Resources

The College reserves the right to restrict the use of its property and resources in any manner and at any time if it determines that such use (a) does not contribute to, impedes, or interferes with, the educational environment or mission, (b) interferes with the exercise of its constitutional or legal rights, (c) violates its commitment set forth in Article XVI of its By-Laws, or (d) threatens the safety of Community Members or property.

3.7 Guiding Principles

Given the variety and complexity of ethical questions that may arise from time to time in carrying out the College's activities, it is difficult to anticipate each unique circumstance that may occur or whether a unique set of circumstances constitute a violation of ethical conduct. As such, the above ethical standards are in no way intended to include all possible examples of ethical conduct violations. The primary guiding principle for Community Members is to conduct all of their affairs with a commitment to excellence and integrity and in keeping with the College's mission statement and values. When in doubt about the permissibility of a course of action or activity, employees are encouraged to consult with Human Resources, the Office of the General Counsel or the Chief Compliance Officer.

4.0 Reporting Suspected Violations

Community Members should familiarize themselves with this policy and all College policies and procedures. If a Community Member suspects that a violation of this Policy has occurred, the Community Member is strongly encouraged to report the incident. The College has established a [Whistle Blower Policy](#) that provides guidance on reporting such violations.

5.0 Enforcement

Community Members who violate this policy are subject to disciplinary action, up to and including possible termination, suspension and/or expulsion from the College.

Related Information:

[Whistle Blower Policy](#)

[Conflict of Interest Policy](#)

[Written Information Security Plan](#)

Policy #	340000-003
Date of Last Review	Feb-02-2018