

POLICY: <p style="text-align: center;">Conflict of Interest Policy</p>		POLICY NUMBER: <p style="text-align: center;">AM-022-A1</p>
		PREVIOUS/REPLACES: <p style="text-align: center;">N/A</p>
APPROVED BY: <p style="text-align: center;">Executive Committee</p>	EFFECTIVE DATE AS OF: <p style="text-align: center;">December 1, 2021</p>	PRIOR VERSIONS: <p style="text-align: center;">Employee Manual</p>

1. Policy Statement

This policy covers a wide range of business activities with which any given employee may, or may not, be involved (i.e., business transaction limitations). The purpose of the policy is to set forth guidelines to prevent actions that could be detrimental to Herzing College and its students, or actions not in conformance with the business ethics and ethical standards of the college. The definitive responsibility of an employee to take action when a conflict of interest is discovered is also included.

It is the policy of Herzing that employees should avoid conflicts of interest that have the potential to adversely affect Herzing College or its students’ interests, to compromise objectivity in carrying out college responsibilities, or otherwise compromise the performance of college responsibilities. Accordingly, personal activities and financial interests should be arranged so as to avoid such conflicts. Failure to do so is a breach of this policy and may constitute misconduct or neglect of duty.

2. Scope

Applies to all employees of Herzing College.

3. Procedure

It is not possible to list every circumstance that may create possible conflicts of interest. Provided below are illustrative examples of activities that represent conflicts of interest.

This list is not all-inclusive. Employees must exercise good judgment and should be aware that a conflict of interest may exist regardless of the person’s motives. If in doubt as to whether a situation may in fact constitute a conflict of interest, employees should review it with the campus President or Chief Operating Officer in advance.

1. Having a personal, business, financial, or other interest, activity, or relationship, outside Herzing College, that has, or that may have, the potential of being antagonistic to or in conflict with the best interests of the College.
2. Full-time faculty or staff rendering directive, managerial, or consultative services to, or being employed by, any outside concern that does business with or is a competitor of Herzing College, except with prior knowledge and consent of the Campus President

3. Accepting personal gifts, loans, excessive entertainment (beyond business meals or other functions which provide opportunities for networking or learning), or other substantial favors from any outside party that does or is seeking to do business with the College or is a competitor of the College. Normal promotional gifts may be accepted on behalf of the College and become the property of the College.
4. Accepting personal gifts from students. Accepting a one-time, personal gift from a student is acceptable as long as its value is less than \$20. Any gifts with a perceived or actual value beyond \$20 should be accepted on behalf of the College and become College's property. Gifts from subordinate employees are discouraged except for birthdays, significant anniversaries, special occasions, or retirement.
5. Dating or having a social or intimate relationship with Herzing College students. If such a relationship existed prior to the individual becoming a Herzing College student, the Campus President or director must be informed, and all services to the student should be administered by another faculty or staff member, if possible.
6. Representing the College in any transaction in which a personal, business, or financial interest exists.
7. Disclosing or using confidential Herzing College information for personal profit and/or advantage.
8. Employees soliciting students or co-workers to purchase materials or services, to participate in a business venture, or hiring students or co-workers for a private venture. This prohibition includes electronic solicitations but does not apply to postings in the break area(s) of announcements for charity, community fund raisers, or sales.

4. Administration

Administered by the Campus President and Chief Operating Officer

5. Review

This policy will be reviewed as required by the Executive Committee in 2025.

6. Definitions

Conflict of Interest – The phrase “conflict of interest” refers to situations in which financial or other personal considerations may compromise, or have the appearance of compromising, an employee’s professional objectivity in meeting Herzing College duties or responsibilities. The bias that such conflicts may impart can affect many Herzing duties, including decisions about personnel, the purchase of equipment, supplies, advertising, instruction, or administration.