

UNIVERSITY OF RICHMOND

CODE OF ORGANIZATIONAL ETHICS AND INTEGRITY

PURPOSE

The University of Richmond's Code of Organizational Ethics and Integrity (this "Code") describes the commitment of the University to the highest ethical standards of honesty and integrity. It is intended to foster the mission and values of the University. This Code also supports the commitment made by the University in *The Richmond Promise* to "operate as a model institution of higher education, sustaining superb faculty and staff and administering the institution with the highest standards of innovation and professionalism."

This Code is an integral component of the University's compliance program and is designed to promote compliance with applicable laws and regulations, as well as the prevention and detection of violations of applicable laws and regulations.

SCOPE

This Code applies to the following members of the University community:

- Members of the Board of Trustees or a committee of the Board of Trustees;
- Members of the governing board of a wholly owned affiliates or subsidiaries of the University;
- Faculty, staff, and student employees of the University; and
- Volunteers, contractors and other representatives providing services to or acting on behalf of the University.

This Code is intended to apply to members of the University community when acting on behalf of the University or in the scope of their employment by the University.

This Code does not apply to students at the University. Conduct standards for students are set forth in the University of Richmond Student Handbook.

INTRODUCTION

The Code will be distributed to all covered members of the University community and each member of the University community is responsible for complying with it.

This Code is not a contract and it may be altered, amended, or modified by the University at any time, without prior notice.

This Code does not replace or supersede the Faculty Handbook or existing University policies and procedures. This Code is intended to be read in conjunction with such documents. In the event that there is a handbook provision, policy, or procedure that is more specific than this Code, this Code is intended to complement that provision, policy, or procedure.

MISSION OF THE UNIVERSITY

The mission of the University of Richmond is to sustain a collaborative learning and research community that supports the personal development of its members and the creation of new knowledge. A Richmond education prepares students to live lives of purpose, thoughtful inquiry, and responsible leadership in a global and pluralistic society.

PRINCIPLES OF ETHICS AND INTEGRITY

Ethical and Responsible Conduct. The University relies on members of the University community to represent the institution, its mission, and values. Members of the University community are expected to conduct themselves according to the highest ethical and professional standards of conduct. They should be fair and principled in their professional activities and in business transactions and should act in good faith when dealing with both internal constituents and external entities.

Compliance with Laws. Members of the University community are expected to comply with all laws and regulations governing the operations of the University. Individuals who have a question about the applicability or interpretation of a particular law or regulation are encouraged to contact their supervisor, the University official with responsibility for that particular area (*see* The University of Richmond Compliance Matrix), or the University's General Counsel (804-287-6683).

Academic Freedom. The University is committed to the principle of academic freedom. Members of the University community are expected to promote academic freedom, including the freedom to discuss all relevant matters in the classroom; to explore all avenues of scholarship, research, and creative expression; and to speak or write as a public citizen without institutional restraint or discipline. Members of the University community are also expected to foster intellectual honesty and freedom of inquiry, to respect those with differing views, and to acknowledge when the individual is not speaking for the University.

Conflicts of Interest. In fulfillment of its mission, the University seeks to ensure that decisions relating to the University are made in an impartial manner, considering only the best interest of the University. The University also seeks to preserve and protect the assets of the University and to avoid benefiting or enriching any person or organization in a manner that is inconsistent with the University's mission, tax-exempt status, and legal obligations. Members of the University community are expected to avoid situations in which their financial or other relationships with outside entities could create an actual, apparent, or potential conflict of interest or cause harm to the University's reputation and to comply with the University's conflict of interest policies.

Responsible Conduct in Research. The University is committed to compliance with international and national standards for the protection of human and animal subjects of research. Members of the University community engaged in research and scholarly activity are expected to adhere to the highest standards of integrity and to conduct all research in compliance with applicable laws, regulations, and University policies.

Privacy and Confidentiality of Information. Members of the University community have access to and maintain confidential information of many different types, including education records subject to FERPA, faculty and staff records, information regarding alumni and donors, and confidential or proprietary business information relating to the University. Members of the University community are expected to educate themselves about and to comply with applicable legal, contractual, or policy requirements for maintaining the confidentiality of such information.

Fostering the University's Mission and Tax-Exempt Status. The University is exempt from federal taxation under Section 501(c)(3) of the Internal Revenue Code. As a tax-exempt entity, the University must ensure the appropriate stewardship of its resources in furtherance of its educational mission. Decisions relating to the University must be made in an impartial manner designed to further the best interest of the University and not to confer inappropriate benefits or to improperly enrich any private person or organization. Members of the University community are expected to be good stewards of the University's resources, to ensure that contracts or business transactions are in the best interest of the University and are consistent with fair market value, and to avoid using University resources or property for their own personal use or benefit, or to benefit a third party.

Additionally, as a tax-exempt entity, the University is prohibited from participating directly or indirectly in political campaign activity on behalf or in opposition to any candidate for public office. The University may not provide monetary or in-kind support to any political party, candidate for public office, or political action committee. Members of the University community may not use their work time or University resources to provide support to any political party or candidate, or for lobbying or other political activities. This is not intended to prohibit individuals from devoting their personal time or resources to political activities.

Respecting Intellectual Property Rights. The University is committed to protecting its own intellectual property and that of third parties. Members of the University community are expected to respect the copyrighted work only in a manner that does not infringe upon the rights of the holder of the copyright. (For more information on the use of copyrighted material, see <http://library.richmond.edu/services/course-reserves/copyright-information.html>.) Members of the University community must comply with the University's intellectual property policy. (<http://grants.richmond.edu/common/pdfs/intellectual-property.pdf>)

Gifts and Entertainment. Members of the University community should not accept or solicit, directly or indirectly, anything of economic value as a gift, gratuity, favor, or entertainment which is, or may appear to be, designed to influence official conduct in any manner, particularly from a person who is seeking to obtain business or financial arrangements with the University.

Respect for Others in the Workplace. As stated in *The Richmond Promise*, the University is dedicated to fairness and an authentic culture of inclusivity that seeks and prizes diversity of experience, belief, and thought. In furtherance of that commitment, the University prohibits discrimination and harassment against applicants, students, faculty, or staff on the basis of race, religion, national or ethnic origin, age, sex, sexual orientation, gender identity, gender expression, disability, status as a veteran, or any classification protected by local, state, or federal law.

The University is also committed to operating as a model institution of higher education, sustaining a superb faculty and staff, and administering the institution with the highest standards of innovation and professionalism. To that end, members of the University community are expected to:

- Be respectful, fair and civil;
- Speak candidly and truthfully;
- Avoid all forms of harassment, illegal discrimination, threats, or violence;
- Promote equal access to programs, facilities, and employment; and
- Promote conflict resolution.

Environmental Health and Safety. The University is committed to providing a safe and healthy environment for its students, faculty, staff, and visitors and to complying with applicable federal and state laws and regulations. Members of the University community are expected to assist the University in maintaining a healthy and safe environment by:

- Ensuring the implementation of appropriate safety policies and procedures in the areas for which individuals have leadership responsibility;
- Reporting unsafe or potentially hazardous conditions to an individual's supervisor to the University's Department of Environmental Health and Safety Services;
- Providing appropriate safety training to supervised employees; and
- Promoting safe working practices.

REPORTING COMPLIANCE CONCERNS

All members of the University community, including faculty, staff, and students, who have a good faith concern regarding compliance with applicable laws and regulations or University policies are encouraged to report such concerns. Members of the University community may raise questions or concerns about compliance with applicable laws with their supervisors, members of the University's administration or faculty leadership, or the University's General Counsel. Students may report such concerns to their dean or to the Vice President for Student Affairs. Members of the University community may also report compliance concerns to the University's Ethics and Compliance Helpline at 888-256-4935 or online at reportlineweb.com/Richmond. Reports to the Helpline may be made anonymously.

NO RETALIATION

The University prohibits retaliation or retribution, in any form, against an individual who reports, in good faith, an actual, potential, or suspected issue regarding compliance with applicable laws or regulations or University policies. As used in this Code, reporting “in good faith” means the individual making the report has a reasonable basis to believe that there has been or may have been a violation of applicable laws or regulations or University policies or that there is a reasonable possibility that such a violation may occur in the near future. Individuals who make frivolous or false reports shall not be deemed to be acting in good faith.

Anyone who engages in or attempts to engage in retaliation or retribution against an individual who reports, in good faith, an actual, potential, or suspected issue regarding compliance with applicable laws or regulations or University policies shall be subject to discipline in accordance with the policies and procedures of the University.

SANCTIONS FOR VIOLATIONS OF THE CODE

Violations of this Code may result in disciplinary action or other appropriate sanctions. The imposition of any discipline or sanction for violations of this Code shall be governed by University policies and procedures, including, but not limited to, the Faculty Handbook and Staff Guidelines.

Approved by the Board of Trustees: February 16, 2012