

TRINITY INTERNATIONAL UNIVERSITY

TIU POLICY: **Conflict of Interest Policy**

TIU POLICY #: **P-56**

STATUS: **Approved, April 2011**
 Updated, March 2016

I. PURPOSE:

In an effort to maintain its integrity in all matters Trinity International University (University) requires all employees to disclose any personal or business relationships which may create a conflict of interest with the University.

II. SCOPE:

This policy applies to all employees of the University.

III. POLICY:

Every employee has a duty to act in the best interest of the University in all personal and professional matters. Any personal or professional relationship that may create, or appear to create, a conflict of interest with the University must be disclosed to Human Resources.

Transactions and business relationships involving apparent conflicts of interest may be to the benefit of the University and need not always be avoided. Nevertheless, to ensure unbiased evaluation of such transactions and to avoid the appearance of impropriety, such transactions must be disclosed to Human Resources. Depending on the nature of the conflict further executive approval may be required. Transactions involving the President shall be reviewed by the Executive Committee of the Board of Regents.

Conflicts of interest may occur in several ways.

A. Business Relationships

1. Each employee shall provide full disclosure of any outside business or financial enterprise he or she is directly or indirectly associated with that might influence, or appear to influence, official decisions or actions on behalf of the University or that may be in opposition to the Evangelical Free Church of America Statement of Faith or University Policies.

2. Employees who have disclosed a potential conflict of interest should not be involved in any decision making or transactions involving that business interest without approval.
3. No employee shall act in any University matter involving a family member without making full disclosure of the matter as described in Section A1 above.

B. Personal Gifts or Benefits

University employees should exercise an abundance of caution before accepting gifts or benefits from people with whom the University has a business relationship. This caution applies to gifts or benefits that are outside the normal course of business or which may appear to be quid-pro-quo in nature. If any employee is unsure as to the appropriateness of accepting any gift or benefit, the employee should seek approval from his or her supervisor.

C. Protected University Information

1. Employees shall refrain from personal activities, including but not limited to, the purchase or sale of securities, real property or other goods or services in which the employee could use, or might appear to have the opportunity to use, confidential information or special knowledge gained as a result of the relationship with the University.
2. Employees shall refrain from unauthorized disclosure of nonpublic information concerning the University's intentions, investments, property development, property sale or acquisition, purchasing or contracting activities.
3. No employee shall make unauthorized use of University resources for his or her personal benefit or financial gain.

D. Procedure

1. The Human Resources department will be responsible for informing employees annually of the policy and for maintaining records of disclosed transactions involving perceived conflicts of interest.
2. Special IRS disclosure requirements may be triggered if the employee, or member of their family, is an officer, director, trustee, partner, employee, or substantial stockholder (5 percent or more of voting stock or control interest) of a for-profit organization doing business with the University.