

DILLARD UNIVERSITY



Employee Code of Conduct Handbook



To the Board of Trustees, Faculty, Staff and other employees of Dillard University:

Dillard University has launched a pathway to create a living environment that honors and adheres to the highest values and codes of conduct that will guide employees in their daily efforts to uphold standards of integrity and improve the lives of those who reside within the community.

Toward this end, I am pleased to inform you, that as Dillard employees, all of us must formally commit to the Dillard University's Employee Code of Conduct. As you know, integrity is one of Dillard University's core values, and the University is committed to upholding this value by operating with the highest professional and ethical standards. Those employed and/or doing business on behalf of the University are bound to conduct themselves in such a manner as to exude the highest sense of integrity, professionalism, and ethical standards, both on and off the University's campus.

Signing the acknowledgment sheet included as the last page in this Employee Code of Conduct and the Conflict of Interest Statement (to be provided annually as a separate document) is a mandatory condition of your employment at Dillard University. This handbook is intended to guide you and bring clarity to the University's expectations of its members in carrying out their respective responsibilities in their capacity as trustees, faculty, staff, or other individuals employed by Dillard University. It is also expected that we will exercise a sense of professional and moral judgment in carrying out our respective responsibilities.

Please read this handbook carefully. You must sign, date, and return the acknowledgment sheet to your immediate supervisor.

Sincerely,

A handwritten signature in black ink that reads "Marvalene Hughes". The signature is written in a cursive style.

Marvalene Hughes, Ph.D.
President

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1.0 INTRODUCTION

Dillard University (“the University”) is committed to the highest standards of professional and ethical conduct. The reputation and successful operation of Dillard University are built upon the principles of fairness, honesty, respect, civility, and accountability. These principles assist Dillard in providing parents and students, local and state governments, suppliers, donors, and the general public with the utmost level of confidence in our organization, educational services, administrative business processes, and financial data.

Dillard University will comply with all applicable laws and regulations. The University also expects its faculty and staff to conduct business in accordance with all relevant laws and to refrain from even the appearance of misconduct or impropriety. To that end, all members of the University community must execute their duties and responsibilities with the highest level of integrity, objectivity, and prudence, avoiding such acts as, but not limited to, illegal or discriminatory activities, confidentiality breaches, fraud, theft, and misappropriation.

2.0 POLICY ON ETHICS¹

2.1 INTEGRITY

All employees must

- Perform their work with honesty, objectivity, diligence, and responsibility;
- Act with a high level of prudence and due professional care, avoiding any real or apparent conflicts of interest;
- Act in good faith without misrepresenting material facts or allowing their independent judgment to be subordinated;
- Accord respect to self and others and accept responsibility for all actions;
- Observe the law and make disclosures expected by the law;
- Not knowingly be a party to any illegal activity or engage in acts that are discreditable to the University;
- Comply with all University policies and procedures;
- Proactively promote ethical behavior amongst peers, in the work environment, and the community;
- Exercise responsible use and control over all University assets and resources; and,
- Respect and contribute to the legitimate and ethical objectives of the University.

2.2 GRATUITIES AND “KICKBACKS”

Dillard personnel shall not use their position to secure special privileges for themselves or their close relatives (see definition below under “Nepotism”). Employees shall not give, offer, or promise anything of value to anyone to enhance relations with that individual or their firm, regardless of whether that individual is in a position to influence any decisions with respect to the University or its activities. This includes, but is not limited to, entertainment, meals, refreshments, gratuities or gifts, loans, rewards, compensation, or other monetary remuneration. This also applies to all contractors, subcontractors, and/or vendors for the purpose of improperly obtaining or receiving favorable treatment. Nor shall any Dillard personnel solicit or accept anything of value from any government official, contractor, subcontractor, vendor, or others for such a purpose.

2.3 CONFLICTS OF INTEREST

All employees must ensure that no conflicts of interest exist. A conflict of interest arises when staff members place themselves in a position where they could use their position to create benefits for their private interests or to give improper advantage to others. When a staff member has a significant interest in, or a consulting

¹ This policy was developed from sources of information provided by other universities through the Association of College and University Auditors (ACUA).

arrangement with, a private business concern, it is important that the staff member avoids conflicts of interest. All employees must comply with the University's Conflict of Interest Policy. (See below § 3.0.)

2.4 CONFLICT OF COMMITMENT

A conflict of commitment occurs when an employee's involvement in external activities adversely affects his or her capacity to meet that employee's primary obligation to the University due to a perceptible reduction of the individual's time and energy devoted to Dillard activities.

2.5 NEPOTISM

Close relatives may not be employed where one is in a position of influence over another. Close relatives include husband or wife, parent or child, son-in-law or daughter-in-law, brothers or sisters. A position of influence exists in instances where selection for employment, judgments concerning performance, compensation, status, fitness for promotion or discipline/discharge require the action of one person with respect to the other.

2.6 CONFIDENTIALITY

Security and confidentiality of University records are matters of concern for all staff who have access to manual or computerized information and files. Each person working with University information holds a position of trust and must recognize the responsibilities of preserving the security and confidentiality of the information. Since a person's conduct, either on or off the job, may threaten the security and confidentiality of the information, any employee or person with authorized access to the system is expected

- Not to make or permit unauthorized use of any information or files;
- Not to seek personal benefit or permit others to benefit personally by any confidential information which has come to them through their work assignment;
- Not to exhibit or divulge the contents of any record or report to any person except in the conduct of their regular work assignment;
- Not to remove any official record of report (or copy) from the office where it is kept except in performance of regular duties or with prior approval;
- Not to operate or request others to operate any University data-processing equipment for personal business;
- Not to aid, abet, or act in conspiracy with any other person to violate any part of this code; and,
- To immediately report any violation of this code to management.

2.7 COMPETENCE

All employees have an obligation to execute their duties and responsibilities with professional care and skill to the best of their knowledge and abilities. To that end, all employees must familiarize themselves with the appropriate University and/or departmental policies and procedures, applicable laws and regulations, and other rules as required performing their respective jobs.

2.8 FINANCIAL REPORTING

All University accounts, financial reports, tax returns, expense reimbursements, time sheets, and other documents, including those submitted to outside agencies, must be accurate, clear, timely, and complete. All entries in University books and records, including departmental accounts and individual expense reports, must accurately reflect each transaction. It is unlawful for any employee to take an action to fraudulently influence, coerce, manipulate, or mislead an auditor engaged in the performance of an audit for the purpose of rendering the financial statements materially misleading.

2.9 REPORTING CODE VIOLATIONS

Employees should report suspected violations of this Code, applicable laws, regulations, and government grant and contract requirements. All members of the University community are strongly encouraged to report any violations of this policy through the University's toll-free hotline number 888-373-8882, which can also be found on Dillard's website. Reports can be made confidentially and/or anonymously through the hotline system. All reports will be reviewed by the Internal Auditor and Vice President of Legal Affairs. All investigations shall be led by the Office of Legal Affairs as necessary, to ensure that the appropriate legal measures are taken during the investigation to protect the rights, privileges, and responsibilities of all parties involved. All investigations, documents, and reports shall be considered confidential and highly security-sensitive to the extent allowed by law.

1. The Office of Legal Affairs shall recommend to the President whether the matter should be handled as a disciplinary matter, as criminal activity, as both or neither. The final course of action will be determined by the University's President.
2. The Internal Auditor shall prepare a single report which includes the allegations, investigator's results, and the course of action taken by the University. The report shall be distributed to the President and Vice Presidents, as deemed appropriate by the President. A summary report shall be presented to the Audit Committee of Dillard University's Board of Trustees by the Internal Auditor.
3. All files and other material related to an investigation shall be retained for an appropriate period of time by the Office of Legal Affairs.

2.10 CONSEQUENCES OF FAILURE TO COMPLY WITH THIS POLICY

Each person is responsible for ensuring that their own conduct and the conduct of anyone reporting to them fully complies with this policy. Violations will result in appropriate disciplinary action up to and including discharge from employment. Disciplinary action will be taken in accordance with the applicable procedures in the Faculty or Staff handbooks. Conduct representing a violation of this policy may, in some circumstances, also subject an individual to civil or criminal charges and penalties.

3.0 POLICY ON CONFLICTS OF INTEREST

3.1 Duty to Dillard University

It is the policy of Dillard University ("University") that the University's Trustees, officers, faculty and other employees carry out their respective duties in a manner that avoids actual, potential, or perceived conflicts of interest. Each of the University's Trustees, officers, faculty members, and employees shall have the continuing affirmative duty to report any personal ownership, interest, or other relationship that might affect her or his ability to exercise impartial, ethical, and business-based judgments in fulfilling responsibilities to the University. Members of the Board of Trustees and officers of the University have a clear fiduciary obligation to the University in connection with their service in such capacities. At all times, they shall act in a manner consistent with this fiduciary obligation and shall exercise particular care that no detriment to the interests of the University (or appearance of such detriment) may result from a conflict between those interests and any personal interests which the individual may have. In addition to any legal or other requirements that apply to the University and its Trustees, officers, faculty, and employees, the following principles shall guide the conduct of the University's affairs:

3.1.1 Impartial Dealings

Trustees, officers, faculty members, and employees of the University shall conduct their duties with respect to contractors, suppliers, agencies, and other persons transacting or seeking to transact business with the University in a completely impartial manner, without favor or preference based upon any consideration other than the best interests of the University.

3.1.2 Acceptance of Gifts, etc.

Trustees, officers, faculty members, and other employees of the University shall not seek or accept for themselves or on behalf of anyone else any gift, entertainment, or other favor from contractors, suppliers, agencies, and other persons transacting or seeking to transact business with the University except:

1. common courtesies consistent with ethical and accepted business practices or
2. gifts, entertainment or favors that have no relation to the University or its affairs (for example, personal gifts between family members or friends).

3.1.3 Personal Benefit

Excessive personal benefit, self-dealing, and loans from the University to Trustees, officers, faculty members, and other employees are strictly prohibited.

3.1.4 Identifying Potential Conflicts of Interest

A conflict of interest can arise whenever a Trustee, officer, faculty member, or other employee or member of his or her family:

1. has an existing or potential interest which impairs or might impair his or her independent judgment in the discharge of responsibilities to the University or
2. may receive a material benefit from knowledge of information which is confidential to the University. The family of an individual includes his or her spouse, parents, siblings, children, and any individual living in the same household.

It is difficult to define what might be considered a potential conflict, but at least the following should be so considered:

1. An official relationship² with banks with which the University regularly does business.
2. An official relationship with investment brokers with which the University does business.
3. An official relationship with suppliers of goods or services to the University.
4. An official relationship with insurance agents or carriers doing business with the University.
5. Family relationships with employees of the University.

²In this context, "official relationship" means serving as an officer, director, employee, partner, proprietor, or owner of 10% or more of the stock of an entity which does business with the University.

3.2 CONFLICTS OF INTEREST WITH RESPECT TO PARTICULAR TRANSACTIONS

3.2.1 Trustees

If any Trustee believes that he or she may have a conflict of interest with respect to any particular transaction, he or she shall promptly and fully disclose the potential conflict and all relevant information to the chairperson of the Audit Committee of the Board of Trustees. The Audit Committee shall review the proposed transaction and all relevant information.

3.2.1.1 If the Audit Committee determines that there is in fact a conflict of interest with respect to any Trustee(s), the affected Trustee(s) shall agree to answer any questions the members of the Audit Committee may have. The Audit Committee shall compare the proposed transaction against available comparable market values. The Audit Committee shall report the conflict(s) to the full Board and the affected Trustee(s) shall agree to answer any questions about the matter that members of the Board may have.

3.2.1.2 If the particular transaction requires a vote of the Board or one of its committees, the affected Trustee(s) shall not be counted for purposes of a quorum nor shall the affected Trustee(s) vote on the issue. Although the affected Trustee(s) shall be present to answer questions, the affected Trustee(s) may be sequestered during the discussion of the issue. The minutes shall reflect the sequestration of the affected Trustee(s) and that the affected Trustee(s) did not vote.

3.2.1.3 If the Audit Committee determines that there is no conflict of interest with respect to a particular transaction involving any Trustee(s), the secretary of the Board shall keep a record of the decision, which shall be available to the members of the Board of Trustees upon request.

Each member of the Board of Trustees shall file a statement in January of each year with the chairperson of the Audit Committee setting forth any conflicts of interest which might be expected to occur within the following year. The statement shall disclose as fully as possible the nature of potential conflicts and the nature of the Trustee's interest in the potential transactions. All statements which anticipate conflicts of interest shall be circulated to members of the Board of Trustees. Each Trustee shall agree to answer any questions about potential conflicts that Board members may have.

3.2.2 University Officers, Faculty Members, and Other Employees

A university officer, faculty member, or other employee shall not conduct business on behalf of the University with persons where there exists a potential conflict of interest as identified in §3.1.4 above, except where such interest or employment has been disclosed to, and specifically approved and authorized by, the Audit Committee.

Each university officer, faculty member, and employee shall file a statement in January of each year with the Internal Auditor setting forth any conflicts of interest which might be expected to occur within the following year. The statement shall disclose as fully as possible the nature of potential conflicts and the nature of the Trustee's interest in the potential transactions. All statements which anticipate conflicts of interest shall be circulated to members of the Audit Committee. Each university officer, faculty member, and employee shall agree to answer any questions about potential conflicts that that individual may have.

3.3 CONFIDENTIALITY WITH RESPECT TO CONFLICTS OF INTEREST

All information concerning actual or potential conflicts of interest shall be held in confidence unless required by law or the best interests of the University dictate otherwise.

3.4 VALIDITY OF UNIVERSITY CONTRACTS AND OBLIGATIONS

The failure of the University, its Trustees, or any or all of its directors, officers, faculty members, and other employees to comply with this conflict of interest policy shall not invalidate, cancel, void, or make voidable any contract, relationship, grant, action, transaction, debt commitment or obligation of the University which otherwise is valid and enforceable under applicable law.

3.5 CONSEQUENCES OF FAILURE TO COMPLY WITH THIS POLICY

Each person is responsible for ensuring that their own conduct and the conduct of anyone reporting to them fully complies with this policy. Violations will result in appropriate disciplinary action up to and including discharge from employment. Disciplinary action will be taken in accordance with the applicable procedures in the Faculty or Staff handbooks. Conduct representing a violation of this policy may, in some circumstances, also subject an individual to civil or criminal charges and penalties.

4.0 POLICY ON FRAUD³

4.1 PURPOSE OF FRAUD POLICY

This policy is established to protect the assets and interest of Dillard University and increase awareness by all employees of their responsibility for reporting suspected fraud. The creation and implementation of, and adherence to, this fraud policy will help assure that the highest standards of professional ethics are maintained by all.

4.2 DEFINITION OF FRAUD

The term fraud is defined in Black's Law Dictionary (Sixth Edition, 1990) as:

An intentional perversion of truth for the purpose of inducing another in reliance upon it to part with some valuable thing belonging to him or to surrender a legal right. A false representation of a matter of fact, whether by words or by conduct, by false or misleading allegations, or by concealment of that which should have been disclosed, which deceives and is intended to deceive another so that he shall act upon it to his legal injury. A generic term, embracing all multifarious means which human ingenuity can devise, and which are resorted to by one individual to get advantage over another by false suggestions or by suppression of truth, and includes all surprise, trick, cunning, dissembling, and any unfair way by which another is cheated.

Fraud encompasses an array of irregularities and illegal acts characterized by intentional deception. These include, but are not limited to, theft, embezzlement, bribery, misappropriations, falsifying records, forgery or alteration of documents, kickbacks, destruction or removal of property, conflicts of interest, and inappropriate use of computer systems, including hacking or software piracy. In addition, no person in a supervisory or management position is to use the authority of that position to assign an employee to perform non-employment related tasks, and managers have a responsibility to develop and implement controls to minimize opportunities for fraud to occur.

³This policy was developed from sources of information provided by other universities through ACUA.

4.3 POLICY STATEMENT

Fraudulent activity of any kind, including for the benefit of the University is expressly forbidden. This policy applies to all University employees and will be enforced without regard to past performance, position held or length of service. All persons found to have committed fraud relevant to University assets shall be subject to punitive action by the University and investigation by external law enforcement agencies when warranted.

It shall also be a violation of this policy for any University employee to make an accusation of fraudulent conduct with the reckless disregard for truth, for the purpose of being disruptive or causing harm to another individual or to the University.

4.4 PROCEDURES

When suspected fraudulent incidents or practices are observed by or made known to an employee, the following procedures must be followed:

1. All members of the University community are strongly encouraged to report any suspected fraudulent activity. Individuals should report suspected violations of this policy through the University's toll-free hotline number 888-373-8882, which can also found on Dillard's website. Reports may be made confidentially and/or anonymously through the hotline system. All reports will be reviewed by the Internal Auditor and Vice President of Legal Affairs.
2. The reporting employee shall refrain from further investigation of the incident, confrontation of the alleged violator, or further discussion of the incident with anyone other than an appropriate member of the offices of Internal Audit and Legal Affairs. University officials will not allow any retaliation or punishment against individuals who in good faith provide information concerning suspected fraud.
3. All investigations shall be lead by the Office of Legal Affairs as necessary, to ensure that the appropriate legal measures are taken during the investigation to protect the rights, privileges and responsibilities of all parties involved. All investigations, documents, and reports shall be considered confidential and highly security-sensitive to the extent allowed by law.
4. The investigator(s) shall prepare a case report for each investigation. Where there is creditable evidence to show that fraud has been committed as defined by this policy, the case report shall include, but not be limited to, the following: subject of the investigation; statement of non-compliance with policy, plan, procedure, law or regulation; description of acts or practices discovered; statements of witnesses; amount and type of loss; the means used to perpetrate the fraud; appropriate documentation; and other data considered necessary. Where the investigation does not yield creditable evidence to support the claim of fraud, the case report shall include at least the following: subject of the investigation, statement outlining the allegation of fraud, statement that no creditable evidence was obtained to support the allegation, and a list of witnesses contacted.
5. The Offices of Legal Affairs and Internal Audit shall review all final reports prepared by the Investigator(s). The Office of Legal Affairs shall recommend to the President whether the matter should be handled as a disciplinary matter, as criminal activity, both or neither. The final course of action will be determined by the University's President.
6. The Internal Auditor shall prepare a report recommending actions to be taken to reduce additional losses and to prevent a recurrence of the fraud. The report shall be distributed to the President and Vice Presidents as deemed appropriate by the President. A semi-annual summary report shall be presented to the Audit Committee of Dillard University's Board of Trustees by the Internal Auditor.
7. All files and other material related to an investigation shall be retained for an appropriate period of time by the Office of Legal Affairs.

4.5 CONSEQUENCES OF FAILURE TO COMPLY WITH THIS POLICY

Each person is responsible for ensuring that their own conduct and the conduct of anyone reporting to them fully complies with this policy. Violations will result in appropriate disciplinary action up to and including discharge from employment. Disciplinary action will be taken in accordance with the applicable procedures in the Faculty or Staff handbooks. Conduct representing a violation of this policy may, in some circumstances, also subject an individual to civil or criminal charges and penalties.

5.0 WHISTLEBLOWER POLICY⁴

5.1 INTRODUCTION

Dillard University has a responsibility for the stewardship of University resources and public and private support which enables it to pursue its mission. The University's internal controls and operating procedures are intended to detect and to prevent or deter improper activities. However, even the best systems of control cannot provide absolute safeguards against irregularities. Intentional and unintentional violations of laws, regulations, policies, and procedures may occur and may constitute improper activity. The University has a responsibility to investigate and report to appropriate parties allegations of suspected improper activities and the actions taken by the University.

5.2 DEFINITIONS

The University's Whistleblower Policy shall incorporate the following definitions:

Baseless Allegation	Any allegation made with reckless disregard for its truth or falsity. Individuals making such allegations may be subject to institutional disciplinary action and/or legal claims by individuals wrongfully accused of such conduct.
Illegal Order	Any directive to violate, or assist in violating, any applicable federal, state, or local law, rule, or regulation.
Improper Activity	Any activity undertaken by a University employee which is in violation of any applicable local, state, or federal law or regulation, or University policy or procedure, including, but not limited to, those relating to corruption, malfeasance, bribery, theft, fraud, coercion, conversion, or misappropriation or misuse of assets.
Interference	Direct or indirect use of authority to obstruct an individual's right to make a protected disclosure.
Official Authority or Influence	Promising to confer, or conferring any benefit; effecting, or threatening to effect, any reprisal; taking, or directing others to take, or recommending, processing, or approving, any personnel action including, but not limited to, appointment, promotion, transfer, assignment, performance evaluation, suspension, or other disciplinary action.
Protected Disclosure	Any good faith communication that discloses or demonstrates an intention to disclose an alleged improper activity.

⁴This policy was developed from sources of information provided by other universities through ACUA.

Retaliation Complaint	Any written complaint by an employee or constituent which alleges retaliation for having made a protected disclosure or for having refused an illegal order or interference with an attempt to make a protected disclosure, together with a statement that the contents of the complaint are true or are believed by the complainant to be true.
University Resources	<p>For purposes of this policy, the term University resources is defined to include, but not be limited to, the following, whether owned by or under the management of the University:</p> <ul style="list-style-type: none"> • Cash and other assets, whether tangible or intangible; real or personal property; • Receivables and other rights or claims against third parties; • Intellectual property rights; • Effort of University personnel and of any non-University entity billing the University for its effort; • Facilities and the rights to use University facilities; • The University's name; and University records, including student, faculty, and staff records.
Whistleblower	<p>A person or entity making a protected disclosure is commonly referred to as a Whistleblower. Whistleblowers may be University employees (academic or staff), applicants for employment, students, vendors, contractors, or the general public.</p> <p>The whistleblower's role is as a reporting party. Whistleblowers are not investigators or finders of fact, nor do they determine the appropriate corrective or remedial action that may be warranted.</p>

5.3 SCOPE OF THE POLICY

This Whistleblower Policy shall apply to any retaliation complaint filed by employees or constituents who have made or attempted to make a protected disclosure or refused to obey an illegal order.

5.4 POLICY STATEMENT

Dillard University recognizes its obligation to its employees and constituents to maintain the highest ethical standards. To protect the integrity of the University's learning community and to ensure the highest standards of conduct by and among members of the University community, the University will investigate any alleged improper activity by its employees or students. Anyone found to have engaged in an improper activity is subject to disciplinary action by the University up to and including dismissal or expulsion and civil or criminal prosecution when warranted. This policy governs both the reporting and investigation of allegations of suspected improper activity and the protection of a whistleblower from retaliation.

All members of the University community are strongly encouraged to report any potential improper activity and, as a result of the University's commitment, Dillard has voluntarily adopted this Whistleblower Policy. Individuals should report suspected violations of this policy through the University's toll-free hotline number 888-373-8882, which can also be found on Dillard's website. Reports may be made confidentially and/or anonymously through the hotline system. All reports will be reviewed by the Internal Auditor and Vice President for Legal Affairs. All individuals reporting a violation of this policy are protected from retaliation.

The University will not tolerate any:

1. retaliatory actions against any employee or constituent for making a good-faith report of a potential improper activity; or
2. direct or indirect use or attempted use of the official authority or influence of an employee's position or office for the purpose of interfering with the rights of another employee or constituent to make a protected disclosure directly to the University.

The University will take the appropriate action necessary to prevent and correct violations of this Whistleblower Policy. Notwithstanding the foregoing, any individual who files a baseless allegation shall not be protected under this policy.

5.5 FILING A RETALIATION COMPLAINT

5.5.1 Where to File a Retaliation Complaint

A retaliation complaint relating to this policy should be reported through the University's toll-free hotline number 888-373-8882, which can also be found on the University's website.

5.5.2 Filing Requirements and Thresholds

A retaliation complaint should set forth, in sufficient detail, the necessary facts and circumstances, including dates and names of relevant persons and the alleged retaliatory acts. All reports will be reviewed by the Internal Auditor and Vice President for Legal Affairs.

In order for a retaliation complaint to be accepted for review by the University, the complainant must allege that:

1. He or she filed a report or made a protected disclosure alleging an improper activity;
2. He or she was threatened, coerced, commanded, or prevented by intimidation from filing a report alleging an improper activity; or
3. He or she refused to obey an illegal order.

5.5.3 Corrective Action

The University will take the appropriate action to prevent and correct violations of this Whistleblower Policy; such action shall be in accordance with applicable laws and regulations, University policies and procedures. Any retaliation complaint will be carefully investigated. All investigations shall be led by the Office of Legal Affairs as necessary, to ensure that the appropriate legal measures are taken during the investigation to protect the rights, privileges, and responsibilities of all parties involved. All investigations, documents, and reports shall be considered confidential and highly security-sensitive to the extent allowed by law.

1. The Offices of Legal Affairs and Internal Audit shall review all final reports prepared by the investigator(s). The Office of Legal Affairs shall recommend to the President whether the matter should be handled as a disciplinary matter, as a criminal matter, as both or neither. The final course of action will be determined by the University's President.
2. The Internal Auditor shall prepare a single report which includes the allegations, investigator's results, and the course of action taken by the University. The report shall be distributed to the President and

Vice Presidents, as deemed appropriate by the President. A summary report shall be presented to the Audit Committee of Dillard University's Board of Trustees by the Internal Auditor.

3. All files and other material related to an investigation shall be retained for an appropriate period of time by the Office of Legal Affairs.

5.6 REPORTING

5.6.1 The Internal Auditor and/or Vice President for Legal Affairs should immediately report any improper activity to the Office of the President when any of the following conditions are met:

1. The matter is the result of a significant internal control or policy deficiency that is likely to exist at other units within the institution or across the University system;
2. The matter is likely to receive media or other public attention;
3. The matter involves the misuse of University resources or creates exposure to a liability of at least \$10,000;
4. The matter involves a significant threat to the health and safety of employees and/or the public;
5. The matter is judged to be significant or sensitive for other reasons; and/or,
6. The matter alleges an improper activity by senior officers, management, Human Resources, faculty, or Legal.

5.6.2 Matters alleging an improper activity by the Internal Auditor shall be reported to the President and Board of Trustees by the Vice President for Legal Affairs.

5.6.3 Matters alleging an improper activity by the President of the University shall be reported to the Board of Trustees.

5.7 CONSEQUENCES OF FAILURE TO COMPLY WITH THIS POLICY

Each person is responsible for ensuring that their own conduct and the conduct of anyone reporting to them fully complies with this policy. Violations will result in appropriate disciplinary action up to and including discharge from employment. Disciplinary action will be taken in accordance with the applicable procedures in the Faculty or Staff handbooks. Conduct representing a violation of this policy may, in some circumstances, also subject an individual to civil or criminal charges and penalties.

6.0 QUESTIONS ABOUT THE EMPLOYEE CODE OF CONDUCT

Any questions about Dillard University's Employee Code of Conduct and the policies set forth therein may be directed to:

Vice President of Legal Affairs	or	Director of Internal Audit
Office of the President		Office of the President
Dillard University		Dillard University
2601 Gentilly Blvd.		2601 Gentilly Blvd.
New Orleans, LA 70122		New Orleans, LA 70122
legal@dillard.edu		InternalAudit@dillard.edu
504-816-4546		504-816-4039

APPENDIX A

Sample*

Annual Conflict of Interest Statement for Dillard University

I, the undersigned, being a Trustee, Officer, Faculty Member or Other Employee of Dillard University (“the University”), hereby state that to the best of my knowledge, except as noted below:

1. I do not have an official relationship as defined in §3.1.4 of the Dillard University Employee Code of Conduct (“Employee Code”) concerning conflicts of interest with any corporation, partnership, or association that transacts business with the University;
2. I, as an individual, do not transact any business, directly or indirectly, with the University;
3. No member of my family, as defined in §3.1.4 of the Employee Code, is an employee of the University or would come within the meaning of No. 1 or No. 2 above.

List below any exceptions to the above statements:

I agree that, if any situations arise of which I am aware, which, in any way, contradict the above statement, I will immediately notify the University of any conflict, real or potential, and make full disclosure thereof. I have read the document entitled Dillard University Employee Code of Conduct, paragraph 3.0 concerning conflicts of interest, adopted by the Board of Trustees on _____. I agree to answer any questions that the University may have with respect to any actual or potential conflict of interest.

Signature

Date

Name

Position

(Please print your name and position: Trustee, Officer, Faculty Member or Other Employee)

* This form will be emailed to all faculty and staff members at the beginning of each January. It will also be available on the Dillard University website. All employees of the University must return this form, signed and dated, to their immediate supervisor by January 15th.

Acknowledgement of Receipt of the Dillard University Employee Code of Conduct

I, _____, have received and read a copy of the Dillard University
(Please print name.)

Employee Code of Conduct which outlines Dillard University policies on ethics, conflicts of interest, fraud, and whistleblowing, as well as my responsibilities as an employee in regard to these policies.

I have familiarized myself with the contents of this handbook. By placing my signature below, I acknowledge receipt thereof and understand, accept, and agree to comply with the policies contained in the Employee Code of Conduct provided to me by Dillard University. I understand this Code of Conduct is not intended to cover every situation which may arise during my employment, but is simply a general guide to the policies, practices, and expectations of the University.

Signature

Date

Please return by: _____
(Date)

Please bring or mail this form to your immediate supervisor.



DILLARD UNIVERSITY
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New Orleans, Louisiana 70122
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