

CONFLICT OF INTEREST

The Whitman community is committed to conducting its business according to the highest standards of ethical behavior. Besides absolute compliance with legal and regulatory standards, Whitman should be known for honesty, integrity and a sense of fairness and respect in its business dealings. This policy applies to all Whitman faculty and staff but especially to those individuals with budget authority or control over significant College resources or grants received by the College.

Although it is not practical to enumerate all situations involving questions of ethical conduct or conflict of interest, the following examples are situations considered to be in conflict with College interests. Some situations such as giving gifts or interests in a business may apply not only to Whitman employees but also to their close relatives, friends and business associates.

1. *College Resources.* Unauthorized use of college resources, including the services of College employees, for personal benefit or gain.
2. *Compliance.* Failure to comply with any applicable laws, regulations, rules or standards of professional conduct.
3. *Confidential Information.* Unauthorized release or reception of any data of a confidential nature available through employment at the College.
4. *Gifts.* Acceptance or provision of gifts, loans or favors should not influence business transactions involving the College. Even a nominal gift should not be accepted if, to a reasonable observer, it might appear to influence a business decision. The value of meals should be reasonable according to the circumstances and locale. Entertainment and other gifts valued at not more than \$100 and under the circumstance would not otherwise be regarded as improper, may be accepted on an occasional basis. Loans in the ordinary course of business from banks or financial institutions are not prohibited.
5. *Interest in Other Business.* An interest (owner, employee, director, vendor) in an organization having or seeking to have, business dealings with the College or in direct competition with the College except (a) with the knowledge and written consent of the President or the President's designee, or (b) in any case where such an interest comprises securities in widely held corporations quoted and sold on the open market, or in private corporations where such interest is not material.

It should be recognized that a conflict of interest is not bad, per se, but rather it is the failure to disclose the existence of a conflict in advance that is harmful. If there is any question about an association, relationship, business arrangement or circumstance that might suggest to disinterested and objective investigators that business decisions were made contrary to the best interests of the College and for personal gain or the gain of family, close friends or business associates prior disclosure in writing should be made. All such prior disclosures should be done through organizational channels to the appropriate Dean or officer of the college.

Any employee serving in the role of investigator (responsible for the design, conduct, or reporting of a sponsored program at the College) is expected to know and follow the disclosure requirements of the sponsor. Disclosures should be made to the relevant Provost, Dean or officer of the College as well as to the sponsor, prior to or at the time of submission of the proposal. The College will take appropriate steps to manage the conflict in accordance with the sponsor's requirements.

The Chief Financial Officer of the College will, annually, request disclosures from all employees with budget authority or control over significant College resources or grants received by the College. In addition, employees are to report possible conflicts of interest with the College through normally established channels if possible. If any employee is told to or pressured to perform any act about which they have ethical or moral questions, it is their responsibility to call such doubts to the attention of their supervisor or on up their respective chain of command if necessary. As applicable such concerns may also be directed to the Provost and Dean of the Faculty, Director of Human Resources, the Controller or the CFO.

Employees are encouraged to report matters involving possible financial reporting issues or the misuse or subversion of the assets of the College, violations of applicable laws, regulations, contractual requirements or other issues of non-compliance to their supervisors or the Controller or CFO as appropriate. If the reporting employee is worried about security, possible reprisals or simply does not know where else to turn, a hotline has been set up to provide the reporting employee with a degree of security and anonymity. Reports may be made confidentially, and even anonymously, although the more information given, the easier it is to investigate the reports. The College will make every effort to honor confidentiality and anonymity to the extent it does not conflict with external regulations and laws. Each report will be reviewed as timely as possible, and at the appropriate level within the College. If a report is made through this avenue, but involves an issue that should be dealt with through processes identified in other published College policies and codes, an appropriate and timely referral will be made. The Audit Committee of the Board of Trustees will receive annual reports from this College Compliance Hotline. Employees may access the College Compliance Hotline by calling toll free 1-888-278-1497 or from the Whitman College Business Office webpage or at <http://www.whitman.ethicspoint.com>.