
CODE OF CONDUCT

Introduction

In furtherance of our mission, values, and vision, Excelsior University adopts this Code of Conduct. Every member of the University community—its staff, faculty, officers, and trustees—are expected to adhere to the principles outlined herein. These principles are rooted in law, University policies and procedures, and sound practice, and serve as the foundation on which all true and lasting success is built.

Ten Guiding Principles

I. Maintaining the Highest Ethical Standards

Every member of the University community is responsible for undertaking their activities in accordance with the highest standards of professional and ethical conduct.

II. Honesty and Integrity

Every member of the University is expected to be honest in all aspects of their conduct. The scope of this expectation includes all interactions among and between staff, faculty, officers, and trustees, as well as interactions by such individuals with all third parties including, but not limited to, students, alumni, volunteers, patients, tenants, vendors, payors, competitors, and public officials or government agencies. Representations that omit information in such a manner as to make a statement false or misleading are likewise prohibited. Every member of the University community is expected, commensurate with their responsibilities, to protect, preserve, and appropriately utilize University property and assets, including, but not limited to, proprietary intellectual property, business plans, financial information, buildings, computer systems, equipment, books, supplies, and funds.

III. Respect for the Law

Every member of the University is expected to know and follow all laws, rules, and regulations, contractual and grant terms or conditions, and University policies and procedures, which relate to his or her position, duties, and responsibilities. Questions or concerns about the legality or propriety of any act or omission by or on behalf of the University, or contractual obligations to which the University may be bound, should be promptly referred to either the member's supervisor, or the Office of Legal Affairs.

IV. A Culture of Trust

It is incumbent upon managers to create and foster an environment of transparent and truthful communication. University members should exercise judgment and raise concerns where appropriate to prevent mistakes or wrongdoing. Managers should be receptive to such concerns. Every member of the University is to faithfully fulfill their professional responsibilities. University members will comply with established procedures for reporting and reviewing actual and potential conflicts of interest and conflicts of commitment. Conflicts, or even the mere appearance of a conflict, between a member's personal interests and official duties or responsibilities are to be avoided. No member may exploit their position with the University for personal benefit.

V. *Respect for each Person*

Every University member shall accord to each person with whom they interact the dignity and respect which we all deserve. University members are to be given equal treatment and equality of opportunity. The University can only meet its full potential when decision-making is free from all forms of prejudice and unlawful discrimination. Furthermore, abusive, discriminatory, or harassing behavior exhibited by staff, faculty, officers, trustees or third parties (e.g., alumni, volunteers, contractors) is prohibited and will not be tolerated. Questions pertaining to these prohibitions may be referred to the Office of Human Resources.

VI. *Academic Integrity*

Every member of the University engaged in teaching, research, examination development, and/or examination administration, is expected to conform to the highest standards of academic integrity. Members shall faithfully execute their responsibilities, honestly represent their work product, and honestly evaluate and accurately record the achievement of students. Activities such as plagiarism, misrepresentation, and falsification of data are prohibited.

VII. *Health and Safety*

The well-being of our community is of paramount importance. Every member of the community is expected to comply with the letter and spirit of occupational health and safety, and environmental laws. Health and safety concerns also extend to students, patients, tenants, and visitors. Community members shall obtain the requisite licenses, permits, and approvals as may be necessary prior to engaging in any activities for which such preclearance is prescribed. Community members shall comply with all guidance from University authorities, as well as local and national government agencies related to protecting health and safety (e.g., wearing masks during a pandemic). Hazardous or potentially hazardous materials are to be handled and disposed of with utmost care.

VIII. *Accurate Recordkeeping*

Every member of the University shall create, retain, and dispose of records in accordance with all applicable legal, professional, and ethical standards. Financial disclosures or like representations shall be comprehensive, accurate, and timely. Members of the University involved, either directly or indirectly, in the preparation and submission of a bill to any individual or entity are expected to use their best efforts to ensure the bill accurately reflects the nature of the services or products provided and is supported by appropriate documentation.

IX. *Code Enforcement*

- This Code of Conduct exists for the benefit of the entire University community. This Code supplements and does not in any way minimize or replace any University policy or procedure established prior or subsequent to its adoption.
- Every member of the University should report a suspected violation of this Code or any other actual or apparent irregularity to their manager, the Office of Human Resources, Office of Legal Affairs, and Risk Management. An individual may report anonymously at the Excelsior University EthicsPoint Compliance line at **844-714-8554** or at the following link: <http://www.excelsior.ethicspoint.com>.
- This Code will be enforced. Suspected violations will be investigated by authorized University personnel and, where appropriate, disciplinary action shall be taken. Managers have a special duty to abide by the letter and spirit of this Code, encourage their subordinates to do likewise, and to cultivate a work environment where all are committed to doing the right thing.

X. *Non-Retaliation*

The University guarantees that no adverse action shall be taken against any individual who, in good faith, raises a concern, complaint, or makes a report of a suspected violation of this Code, irrespective of the ultimate resolution of any issue related to such concern, complaint, or report.