

Conflicts of Interest	
Administered By: Human Resources	
Approved By: Dr. Jeff Gingerich, President	
Policy Effective Date: March 6, 2024	
Policy Number:	New Policy or Revision of Existing Policy_X
HR-2024-003	Name of Previous Policy: Conflict of Interest Policy (September
	2018)

As an employee of St. Bonaventure, you are expected to act in the best interest of St. Bonaventure and avoid conflicts of interest. A conflict of interest may arise whenever a personal interest interferes -- or even appears to interfere -- with the interest of St. Bonaventure. While we respect your right to manage your personal affairs and investments and we do not wish to intrude on your personal life, St. Bonaventure employees should place the University's interest in any business transaction ahead of any personal interest or gain.

To avoid a conflict of interest, you should identify potential conflicts when they arise and notify your supervisor if you are unsure whether a relationship or transaction poses a conflict. Your supervisor will be able to pre-clear or resolve certain conflicts, or will be able to contact someone else at the University who can. The following are examples of conflict of interest that could arise and are prohibited unless they have been pre-cleared or resolved:

- You or your spouse, partner, or family member work at an outside job, or serve as an officer, director or consultant to another company that interferes with your ability to do your job at St. Bonaventure.
- You provide additional professional services (e.g., teaching St. Bonaventure courses) or work in an additional part-time function (e.g., coach, tutor, or etc.) other than those services specified in your primary job description or contractual agreement.
- You have a spouse, partner or family member that is in a direct reporting relationship with you, or you have the ability to supervise, review or influence the job evaluation, hiring, pay or benefits of any spouse, partner or family member who also works at St. Bonaventure.
- You have other work obligations or other commitments which, due to the time associated with these commitments or obligations or on account of other relevant circumstances, materially impairs or in conflict with the duties and responsibilities associated with your primary position with St. Bonaventure.

Because it is impossible to describe every potential conflict, we rely on your commitment to exercise sound judgment and to seek advice when appropriate. If you need advice on whether a particular activity is a conflict of interest, please contact your supervisor or the Office of Human Resources.