

ST. BONAVENTURE UNIVERSITY

CONFLICT OF INTEREST POLICY

University Officers and key employees have a responsibility to discharge their duties in good faith and to act in the best interests of the University. For the purpose of this policy, University Officers and key employees are defined below. Having and observing a robust conflict of interest policy demonstrates a commitment to ethical principles and establishes a mechanism to protect the University's interests with respect to conflict of interest issues.

Policy: An officer or key employee shall be considered to have a conflict of interest if **(a)** such officer or key employee has existing substantial financial or other interests which impair or might reasonably appear to impair such member's independent, unbiased judgment in the discharge of his or her responsibilities to St. Bonaventure University, or **(b)** such officer or key employee is aware that a member of his or her immediate family, or any organization in which such officer or key employee is an officer, director, partner, officer or key employee, or controlling stockholder, has such existing substantial financial or other interests or **(c)** the IRS also recognizes a conflict of interest where the individual or an immediate family member has a personal interest (e.g. employment by or ownership in another entity, or close personal relationship) which may conflict in some way with the interests of the University.

All officers or key employees shall disclose fully and in writing any possible conflict of interest at the earliest practicable time, and shall annually review the conflict of interest policy and complete the conflict of interest questionnaire and submit it to the university to be kept on file. Conflict of interest statements will be kept confidential.

The following list is not exhaustive, but points out some common examples of potential conflict of interest situations:

- Exercising authority to purchase goods or services from vendors in a manner that personally benefits the officer or key employee to the detriment of the University.
- Investment or financial interest in another entity, except publicly traded securities.
- Personal borrowing from or lending to a supplier or competitor, excluding financial relationships on terms available to other customers.
- Appointment to a Trusteeship of another entity that compete with or who's mission is in conflict with the University
- Relationships with board members of another entity who may be suppliers or business partners with to the University.
- Participation in regulatory, civic or professional organizations that might involve divulging confidential data.
- Holding public or appointive office that may require participation in setting policies that would affect the university.
- Attempting to influence matters of university business or personnel administration, including hiring or terminations, on behalf of an individual with whom the officer or key employee or immediate family member has a close personal relationship.

Officers and Key Employees Definition - University Officers and key employees shall include those persons with the following titles: President, Provost, Senior Vice President, Vice President, Vice Provost, Associate Vice President, Academic Dean, Director of Intercollegiate Athletics, Executive Director of Technology Services, Director of Institutional Research and Registrar, Director of the Franciscan Institute, Director of the Library, Director of Human Resources, Controller, Director of Budget/Procurement and Director of Advancement Services.

ST BONAVENTURE UNIVERSITY

CONFLICT-OF-INTEREST QUESTIONNAIRE

(Name)

(Title and Department or Office)

1. Have you reviewed the St. Bonaventure University policy (above) on conflicts of interest and their disclosure? Yes_____ No_____

2. Are you an officer or director of any corporation with which **ST. BONAVENTURE UNIVERSITY** has business dealings or are you an officer or director of any other institution of post-secondary education?

Yes_____ No_____

If the answer to the forgoing question is yes, please list the names of such corporations, the offices held, and the approximate dollar-amount of business involved with the University last year.

2. Do you, or does any member of your immediate family, (spouse, dependent or children, parent, grandparent or sibling) have a financial interest or receive any remuneration or income from, any business organization with which **ST. BONAVENTURE UNIVERSITY** has business dealings?
Yes_____No_____

If the answer to the forgoing question is yes, please supply the following information:

- a. Names of the business organizations in which such interest is held and the person(s) by whom such interest is held:

b. Nature and amount of each such financial interest, remuneration, or income:

3. Did you, or any member of your immediate family, receive, during the past twelve months, any gifts (other than nominal) or loans from any source from which **ST. BONAVENTURE UNIVERSITY** buys goods or services or with which **ST. BONAVENTURE UNIVERSITY** has significant business dealings?

Yes _____ No _____

If the answer to the forgoing questions is yes, list such gifts or loans as follows:

NAME OF SOURCE	ITEM	APPROXIMATE VALUE
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4. Please list any other activities or relationships which might give rise to a conflict of interest (note "none" if applicable):

5. My signature below confirms that I will not permit association of the institution's name or use any university facilities or resources in connection with a lobbying effort not authorized by the President or designee or with any political campaign for public office. Additionally, I will report any conflict of interest as soon as it becomes known to me.

I certify that the forgoing information is true and complete to the best of my knowledge.

Signature

Date

Approved 5/12/09