

ROBERT MORRIS UNIVERSITY

Policy of Ethical Practice





Robert Morris University has a strong foundation and a rich heritage. Since its beginning in 1921, the institution has earned a well-deserved, strong academic reputation by providing students with quality curricula responsive to the needs of business and industry. Equally important is our legacy of an unwavering commitment to high ethical standards and integrity. All of this has contributed to our success over the years.

As an employee of Robert Morris University, your contributions are critical to our continued success. It is important that each of us conduct ourselves in a legal and ethical manner. The Robert Morris University Policy of Ethical Practice was created to provide guidance in doing so.

I look forward to working with all of you to achieve even greater success for our university.

Sincerely,

Gregory G. Dell'Omo, Ph.D.
President

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1. INTRODUCTION

This Policy of Ethical Practice (the “Policy”) covers a wide range of Robert Morris University practices and procedures. It does not cover every issue that may arise, but it sets out basic principles to guide all employees of Robert Morris University and its subsidiaries (collectively referred to as “Robert Morris University” or the “University”). Robert Morris University employees must conduct themselves in accordance with this Policy and seek to avoid even the appearance of improper behavior. Robert Morris University’s agents and representatives, including consultants, vendors and volunteers, are also expected to abide by this Policy.

Employees must comply with all applicable federal, state and local laws. If a provision of this Policy conflicts with a law, employees must comply with the law. If an employee has any questions about conflicts or apparent conflicts, he/she should consult with his/her immediate supervisor, area vice president or senior vice president, or the vice president for human resources. This Policy supersedes all other codes of conduct, policies, procedures, instructions, practices, rules, or written or verbal representations to the extent that they are inconsistent with this Policy. However, this Policy does not supersede the provisions of any applicable collective bargaining agreement.



2. PURPOSE

Robert Morris University seeks to promote:

- Honest and ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and professional relationships;
- Full, fair, accurate, timely and understandable disclosure in reports and documents that Robert Morris University files with, or submits to, governmental agencies as well as other public communications made by Robert Morris University;
- Compliance with applicable governmental laws, rules and regulations;
- Prompt internal reporting to an appropriate person or persons identified in section 12 of this Policy; and
- Accountability for adherence to this Policy and other University policies.

3. ETHICAL BEHAVIOR

All Robert Morris University employees are expected to perform their job responsibilities in a manner that brings credit to themselves as individuals and reflects favorably on Robert Morris University. Robert Morris University proactively promotes ethical behavior, and encourages any employee to talk to supervisors, managers or other appropriate personnel when in doubt about the best course of action in a particular situation. The policies set forth in the Robert Morris University Policy of Ethical Practice, together with good common sense and one’s own sense of right and wrong, are meant to guide decisions.

Strict adherence to this Policy, and the policies and procedures set forth in other University material, is required.

4. CONFLICTS OF INTEREST

A “conflict of interest” exists when an employee’s private interests interfere with, or even appear to interfere with, the interests of Robert Morris University. As an employee, one must be free of any actual or apparent conflicts of interest to assure the ability to exercise independent judgment with regard to Robert Morris University’s best interests. No employee shall engage in conduct, or allow a situation to exist, in which the employee’s personal interests conflict with his/her responsibility for honesty and fair dealings with Robert Morris University. Examples of a conflict of interest include but are not limited to:

- When an employee takes actions or has interests with a vendor or other entity that impairs his/her objectivity as it relates to Robert Morris University;
- When an employee, or a member of his/her family, receives improper personal benefits as a result of his/her position with Robert Morris University;
- When an employee conducts Robert Morris University business with a relative or significant other, or with a business with which a relative or significant other is associated in any significant role, without full disclosure to and approval by Robert Morris University; or
- When an employee serves as a director of any organization that competes with Robert Morris University, except as otherwise approved by Robert Morris University.

Conflicts of interest may not always be clear-cut. If an employee has a question, he/she should consult with his/her immediate supervisor, area vice president or senior vice president, or the vice president for human resources.

Employees should review and be familiar with Robert Morris University’s “Accepting Gifts” and “Behavior/ Conduct” policies. No one working on behalf of Robert Morris University shall offer or accept meals, entertainment or travel that can reasonably be interpreted as an attempt to improperly influence the recipient. Meals, entertainment or travel may never be solicited for individual benefit. Further, one may never give or accept them where it would be unlawful to do so or it would knowingly violate



the policy of the other party’s employer. If an employee becomes aware of a conflict or potential conflict, he/she should follow the reporting guidelines in section 12 of this Policy.

Conflicts of interest are prohibited as a matter of Robert Morris University policy, unless a disclosure form is approved as discussed later in this Policy. If a conflict exists and a disclosure form has been approved, the employee must also remove him/herself from any decisions being made related to the conflict.

5. OFFICER AND KEY EMPLOYEE CONFLICTS OF INTEREST

Individual employees identified as Officers and Key Employees will also be required to comply with the additional disclosure requirements of the Officer and Key Employee Conflict of Interest Disclosure Statement. Employees meeting the qualifications of these categories will be notified directly during each annual certification and disclosure period.

The annual disclosure does not replace the requirements within section 4 of this Policy regarding ongoing conflict of interest disclosures.

6. FINANCIAL INTEGRITY, DISCLOSURE AND OTHER REPORTING

Robert Morris University financial statements, and other data statements, must fairly and accurately present the financial condition of the University. All transactions affecting Robert Morris University, directly or indirectly, shall be recorded properly, accurately and in a timely manner, and documented in Robert Morris University's books and records in accordance with University policies, U.S. Generally Accepted Accounting Principles and other governmental rules and regulations.

Federal and state laws require Robert Morris University to disclose certain information in various reports that the University must file with or submit to government authorities. In addition, from time to time, the University makes other public communications, such as issuing press releases.

Robert Morris University expects all employees who are involved in the preparation of these filings or other public documents to ensure that the information disclosed in the documents is fair, accurate, timely and understandable.

To the extent that an employee reasonably believes that questionable accounting or auditing conduct/practices have occurred or are occurring, he/she should follow the reporting guidelines in this Policy.

7. CONFIDENTIALITY

Robert Morris University respects the privacy of its employees. Robert Morris University's relationship with employees is built on trust and respect. Accordingly, Robert Morris University will provide confidential employee information to others only on a need-to-know basis for legitimate business purposes and in accordance with applicable laws (see *"Personnel Records" policy*). Employees must maintain the confidentiality of confidential information entrusted to them by Robert Morris University, its students and its vendors, except when disclosure is authorized by Robert Morris University's established written policies, outside counsel or required by laws or regulations (see *"Behavior/Conduct" policy*).

Confidential information includes all non-public information that might be of use to third parties or be harmful to Robert Morris University, its employees, its students or its vendors, if disclosed, and information that employees, students and vendors have entrusted to us. The obligation to preserve confidential information continues even after employment ends. In connection with this obligation, every employee should comply with the "Confidential and Propriety Information" policy of Robert Morris University.





8. ACADEMIC FREEDOM

The Robert Morris University Policy of Ethical Practice affirms the fundamental value of academic freedom as stated in the American Association of University Professors' "1940 Statement of Principles on Academic Freedom and Tenure." The purpose of the 1940 statement is to ensure that faculty and students in American universities are free to read, write and speak about the truth as it is articulated and debated in the academic disciplines:

Academic freedom is essential to these purposes and applies to both teaching and research. Freedom in research is fundamental to the advancement of truth. Academic freedom in its teaching aspect is fundamental for the protection of the rights of the teacher in teaching and of the student to freedom in learning. It carries with it duties correlative with rights.

9. PROTECTION AND PROPER USE OF UNIVERSITY ASSETS

Employees should protect Robert Morris University's assets and ensure their efficient use. Any suspected incident of fraud or theft should be reported immediately based on the reporting guidelines in this Policy. Robert Morris University equipment should not be used for non-Robert Morris University business, although limited incidental or personal use is permitted with the approval of one's immediate supervisor. As such, employees should be familiar with and follow the "Information Technology Acceptable Use Policy."

Use of Robert Morris University's electronic media (including, but not limited to telephone, Internet, electronic databases and e-mail) by faculty and staff should reflect the duties and rights of faculty as stated in the American Association of University Professors' "1940 Statement of Principles on Academic Freedom and Tenure."

10. DISCLOSURES

As outlined in Section 4 of this Policy, the disclosure form should be utilized when a conflict of interest, or even the appearance of one, exists. Disclosures for employees may be approved only by Robert Morris University's president, senior vice president for academic affairs, or senior vice president for business affairs, and must be in writing. Disclosures for officers must be approved by the chair of the Board of Trustees (the "Board") and documented in the minutes to the Executive Committee of the Board.

Robert Morris University continually reviews its policies and procedures and reserves the right to modify, supplement, amend or delete any provisions of this Policy.

11. VIOLATIONS – CONSEQUENCES

Each employee of Robert Morris University has an obligation to promptly report (a) questionable or improper accounting or auditing matters, and (b) violations and suspected violations of this Policy or other University policies and procedures (hereinafter collectively referred to as "Concerns") by anyone working

for or on behalf of the University. If an employee is in a situation or is asked to enter into a situation that he/she believes may violate or lead to a violation of this Policy, he/she should follow the reporting guidelines described in this Policy.

No employee who in good faith reports a Concern shall be subject to retaliation or adverse employment consequences. Any employee who retaliates against someone who has reported a Concern in good faith is subject to appropriate discipline up to and including termination of employment.

12. REPORTING RESPONSIBILITY AND PROCEDURES

If an employee has questions or believes that a violation is occurring or has occurred, he/she should not keep the information to him/herself, nor perform a personal investigation, but should promptly inform the appropriate personnel of the Concern. As a general rule, to report a suspected Concern, one is encouraged to do any of the following:

- Discuss the matter with one's immediate supervisor;
- Raise the matter with the vice president in one's area;
- Contact the vice president for human resources or the director of internal audit;
- Call the Policy of Ethical Practice Reporting Hotline at 800-963-5593 or submit a report via the Web at www.ethicspoint.com;
- Contact the president of the University; or
- Contact the chair of the Audit and Risk Committee of the Board of Trustees at auditriskchair@rmu.edu.



13. HANDLING OF REPORTED VIOLATIONS

All reports will be investigated promptly and thoroughly, and appropriate action will be taken. All reports will be treated as confidential to the extent practicable. All employees are expected to cooperate in investigations and refrain from interfering with or obstructing an investigation, misrepresenting or withholding information, attempting to discover the identity of anyone cooperating in an investigation, or breaching the confidentiality of an investigation. Doing so will result in appropriate disciplinary action up to and including termination.

Reports to the Reporting Hotline and submissions made via the Web may be made anonymously. The Reporting Hotline and Website are administered by an independent third party to ensure the reports remain anonymous. If an employee chooses to report a Concern anonymously, he/she should provide very specific, detailed incident information to allow for appropriate investigation.

For all internally reported Concerns, the reporter will be notified of the status of the Concern within 10 business days, whenever possible. For all hotline/website reported Concerns, the reporter will receive a report key to use to view the status of the Concern after 10 business days.

The director of internal audit will regularly report investigation results of reported Concerns to the Audit and Risk Committee of the Board of Trustees for its review.

14. ACTING IN GOOD FAITH

Anyone reporting a Concern must act in good faith and have reasonable grounds for believing the information disclosed indicates an improper accounting or auditing practice, or a violation of this Policy, University policies or procedures, or laws and regulations. The act of making allegations that prove to be unsubstantiated, and that prove to have been made maliciously, recklessly or with the foreknowledge that the allegations are false, will be viewed as a serious disciplinary offense and may result in appropriate discipline, up to and including termination of employment.



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FOR MORE INFORMATION

For additional information regarding the Robert Morris University Policy of Ethical Practice, please contact Human Resources at **412-397-6270** or Internal Audit at **412-397-5274**.

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