CONFLICT OF INTEREST STANDARDS AND PROCEDURES

Concordia University is fully committed to conducting its responsibilities in a manner reflecting the highest degree of integrity and honesty. The success of the University in conducting its affairs is the sum of the efforts of each individual --- in executing his or her responsibilities with good judgment and in an ethical manner.

In general, regents, faculty and staff shall scrupulously avoid acting on any matters in which the regent, faculty or staff has, or may be perceived to have, a conflict of interest. When evaluating an action, regents, faculty and staff are to determine what they believe to be in the best interests of the University. The purposes expressed in the organic documents of the University -- its articles of incorporation, mission, and vision -- define the basic interests of the University.

Conflict of Interest Standards

1. Conflict Transactions.
   A conflict of interest transaction is a transaction with the University in which a regent, faculty or staff has a direct or indirect interest. In the event of a conflict of interest transaction, the material facts of the transaction and the regent, faculty or staff interest shall be disclosed to the president.

   The president may grant a waiver or forward the matter to the Regents for decision.

2. Indirect Conflict of Interest.
   A regent, faculty or staff (hereafter “individual”) has an indirect conflict of interest in a transaction if:

   a. another corporation or other entity in which the individual has a material financial interest or in which the individual is a general partner is a party to the transaction; or

   b. another entity of which the individual is a director, officer or trustee is a party to the transaction and the transaction is or should be considered by the regents of the University; or

   c. the individual knows that a family member of the individual has a direct interest in the transaction;

   d. or the individual is aware of any other factor that could interfere with the individual’s ability to act in the interest of the University with respect to the transaction or could appear to be a conflict of interest.

3. Direct Conflict of Interest.

   A regent, faculty or staff (hereafter “individual”) has a direct conflict of interest involving the University if, among other things, the individual does any of the following:

   a. accepts any money or thing of value for negotiating, procuring, recommending or aiding in the making of a loan to or from the University.

   b. has a pecuniary interest, whether as principal, agent or beneficiary, in a purchase, sale or loan to or from the University.

   c. accepts any advances for future services to be performed.

   d. accepts a guarantee of financial obligations from the University.
e. enters into a transaction, for the provisions of goods or services to the University in the normal course of business, either personally or through any partnership or company in which the individual has, directly or indirectly, a proprietary interest in excess of five percent.

f. accepts employment by or reports to a contractor of Concordia while such individual remains employed by Concordia. No individual employed by Concordia shall be employed by or report to a contractor of Concordia while such individual remains employed by Concordia.

Advisory Board Compensation Rules:

a. University employees are prohibited from serving on the advisory board of any education loan lending institution.

4. Exceptions

The foregoing prohibitions shall not apply to or affect:

a. exercising of any rights under any policy of insurance.

b. advance of expenses for travel or other related business activities of the University.

c. direct employment benefits established through employment contracts.

Persons nominated or appointed to become members of the Board of Regents and employees shall receive copies of this statement prior to assuming office and shall sign an annual statement acknowledging that they have reviewed the statement and agree to abide by it and work toward its overall objective.

Approved: Board of Regents
March 21, 1998

Updated: May 27, 2008

Concordia University
Portland, OR

CONFLICT OF INTEREST STANDARDS AND PROCEDURES

I have received a copy of the Conflict of Interest Standards and Procedures which outlines the guidelines in this area of Concordia University, Portland, OR. I have read the information contained in the statement. I agree to abide by the policy and to work toward its overall objective.

Signed _____________________________________________ Date __________________________

Issued: 09/01/2015

PLEASE SIGN AND DATE AND RETURN TO THE HUMAN RESOURCES DEPARTMENT WITHIN 7 BUSINESS DAYS OF EMPLOYMENT OFFER