Conflict of Interest

Wilkes University ("the University") is a vital component of the local community and as such is committed to help strengthen the relationships of employees to the communities in which they work and live. While the University values this extension of our mission, it recognizes that conflicts may arise as a result of these relationships. Since the University consistently avoids conflict of interest or appearance of such, this policy serves to help proactively identify and address any potential employee conflicts.

A conflict of interest arises when an employee is in a position to influence either directly or indirectly University business, research or other decisions, in ways that could lead to gain for the employee, the employee's family or others to the detriment of the University's integrity and its mission.

No university employee who is a vendor of goods or services to the University or is affiliated (as defined below) with any vendor of goods or services to the University shall participate on behalf of the University in the administration of any contract with such vendor.

No university employee who is a recipient of grants, goods or services from the University or is affiliated (as defined below) with a recipient of grants, goods or services from the University shall participate on behalf of the University in the administration of, any contract or other arrangement with such recipient.

No university employee shall, without previous approval of the President and Cabinet, be, or be affiliated with, either a vendor to, or recipient of grants, goods or services from, the University.

A person shall be deemed to be affiliated with an entity if:

- (a) the person serves as a member of a governing body of the entity,
- (b) the person serves as an officer or employee of the entity,
- (c) the person has a material economic relationship with such entity, including the receipt of gifts or special favors of more than negligible value, or
- (d) the person's parent, spouse, sibling, child, or grandchild, or a member of the immediate household of the person or such relative, holds a position described in or (b) above or has a relationship described in (c).

A person shall be deemed to be affiliated with an individual if such individual is a parent, spouse, sibling, child, or grandchild or member of the immediate household of the person or such relative, or has a material economic relationship with the person.

Employees must safeguard their university responsibilities against actual or apparent conflict of interest that could arise from the type and scope of activities engaged in by University employees. Employees are required to complete this disclosure during the pre-employment process and at any time during the course of employment when a conflict of interest arises. Employees should disclose the relevant facts to the Human Resources department for guidance if/when they are unsure whether an affiliation exists. If

necessary the President and Cabinet will provide guidance about the existence or non-existence of an affiliation.

CONFLICT OF INTEREST DISCLOSURE STATEMENT

I have read and familiarized myself with the University's Conflict of Interest Policy. I certify that I am not, and have no affiliation with, an existing or anticipated vendor to, or recipient of grants, goods or services from, the University and have no information to report, except (please write "None" if you have no information to disclose):

Signature

Print Name

Position

Date