



Hamilton

Conflicts of Interest Policy

Simply stated, a conflict of interest occurs whenever an employee engages in activities that interfere with the performance of job responsibilities at the College or where the prospect of direct or indirect personal gain could influence an employee's judgment or action.

No gift, loan or favor will be made to or accepted by employees or their immediate families involving any supplier, customer, or others with whom Hamilton does business or for whom Hamilton students, alumni, faculty, administrators, or other employees might provide a market by reason of their relationship to Hamilton, if such gift, loan, or favor is intended to influence a business decision.

This policy does not prohibit casual entertainment, business entertainment consistent with the College's usual practices, or gifts which are reasonably viewed under the circumstances in which they are given or received to be of nominal value. For this purpose, any gift in kind of less than \$100 would be considered of nominal value. Acceptance of cash or cash equivalents is not acceptable under any circumstances. By way of example, attendance at a professional sporting event as a guest of a supplier or customer would constitute business entertainment consistent with the College's usual practices; however, the receipt of tickets to the same event from a supplier or customer without the attendance of the supplier or customer would be viewed as a gift which must be of nominal value.

The College recognizes that many employees participate in non-College activities that are recreational or that increase personal or professional development. The College encourages such activities as long as they do not constitute or appear to constitute a conflict of interest.

Employees must inform their supervisor and receive approval before engaging in any outside activities that pose a potential for conflict of interest. Examples of potential conflict of interest include, but are not limited to:

- outside employment;
- working for the College as an outside vendor;
- use of College facilities, supplies or equipment for outside business, philanthropic, community, political or other interests or activities;
- outside interests of the employee, or of close family members, with or related to suppliers of goods and services to the College;
- allowing unauthorized use of College facilities by friends, family members or community associates;
- direct or indirect participation in purchases for personal use for less than the full value or utilizing discounts allowed to the College for personal gain;
- using information that the College considers privileged or confidential, for non-College purposes;
- using the name of the College for monetary profit or acting as a private person in a way that could create the impression that the employee is speaking for the College.

Failing to report such activity or continuing an activity if a supervisor has disapproved it, is grounds for disciplinary action, including termination of employment.