

SUBJECT: CODE OF CONDUCT AND ETHICS

APPLICABILITY: Trustees, Non-exempt Staff, Non-academic Administrative and Supervisory Personnel, Faculty, Others

I. GENERAL POLICY

North Central College is committed to high standards of conduct in all aspects of business and to a moral code of conduct expected at a church-affiliated college. Employees of North Central College are obligated to perform all duties associated with their positions skillfully, impartially and diligently to the extent possible in order to contribute to the efficient achievement of the College's goals.

With reference to this Code of Conduct and Ethics policy, the term "employee" includes, but is not limited to, trustees, faculty, staff, students, interns, graduate assistants and volunteers, whether or not they are compensated by the College.

II. PURPOSE

To establish standards of ethical conduct for all employees of North Central College and guide those employees in their dealings with colleagues, students, the College and the community.

Accordingly, the College has adopted this Code of Conduct and Ethics to:

- Promote honest and ethical conduct.
- Promote full, fair, accurate and timely and understandable disclosure.
- Promote compliance with applicable laws and governmental rules and regulations.
- Ensure the protection of the College's legitimate business interests, including corporate opportunities, assets and confidential information.
- Deter wrongdoing.

III. STANDARDS OF BEHAVIOR

Although it is not possible for a code of conduct to cover all the situations that may confront an employee, the following basic standards of behavior have been established and shall be observed by all employees. Failure to comply with these Standards of Behavior may result in disciplinary action up to and including termination as outlined in *Termination of Employment, Section II.5 of the Personnel Policy Guide*. This list is not conclusive and the College reserves the right to discipline and/or terminate employees for conduct not listed below.

With respect to their duty of care, employees should:

- Act and conduct College business in accordance with applicable laws and regulations.
- Act in accordance with applicable laws and College regulations including those which pertain to the use of, or the providing of, alcohol or drugs.

- Refrain from action that may result in embarrassment to others (employees or students) or to the College.
- Refrain from acting in any way that would unfairly harm the reputation and career prospects of others (employees or students).
- Refrain from using their position with the College for personal gain or refrain from taking advantage of another person's skills and abilities outside the normal employment relationship.
- Respect individual rights to privacy under FERPA Federal and Illinois state law and undertake to keep personal information in confidence, including information gained through records from outside the College.
- Refrain from behavior that might be construed as harassment, sexual or otherwise, against other employees or students. Supervisors in particular have a responsibility to discourage such actions and must take corrective measures when reports of such behavior are received.
- Refrain from entering into relationships with students that could be considered inappropriate.

With respect to employee obligation to the College, employees should:

- Refrain from representing themselves as spokespersons for the College unless authorized to do so.
- Refrain from representing themselves as acting for or on behalf of the College when undertaking any outside work.
- Avoid improper use of the resources of the College for private gain or the gain of a third party.
- Foster collegiality among members of the College community.

Outside employment of employees is discouraged where such employment can reasonably be expected to interfere with efficient work performance.

Employees have a personal responsibility to ensure that College assets entrusted to their care, such as vehicles, machines, supplies, funds, etc. are properly utilized and safeguarded.

Employees must avoid activities which constitute fraud.

Fraud is a deliberate and/or unlawful deception, misrepresentation or concealment of facts practiced to secure advantage, benefit or gain and/or to cause loss to another.

Employees are prohibited from:

- Embezzlement, misappropriation or other financial irregularities.
- Participating in any revenue sharing arrangements with any lender.
- Steering borrowers to particular lenders or delaying loan certifications.
- Offering private loan funds to students in exchange for providing concessions or promises to the lender for a specific number or volume of loans.

- Forgery or alteration of documents (checks, timesheets, contractor agreements, purchase orders, bank drafts, other financial documents, electronic files).
- Forgery or alteration of a check, bank draft or any other financial document.
- Misappropriation of funds, securities, supplies, inventory or any other asset (including furniture, fixtures or equipment).
- Impropriety in the handling or reporting of money or financial transactions.
- Authorization or receipt of payment for goods not received or services not performed.
- Authorization of receipt of payments for hours not worked.
- Disclosure of confidential and proprietary information to outside parties.
- Solicitation of items of material value from contractors, vendors or persons providing services/materials to the College.
- Destruction, removal or inappropriate use of records, furniture, fixtures and equipment.
- Any similar or related inappropriate conduct.

Guidelines for Receipt of Gifts

- Employees may accept gifts from vendors with a value of \$25 or less; such gifts should not be accepted with the specific intent for the donating vendor to receive favorable treatment.
- Acceptance of gifts with a value greater than \$25 must be approved by the cabinet supervisor.
- All tangible (not consumable) gifts received by an employee with a value greater than \$25 must remain property of North Central College.
- Financial Aid office employees are prohibited from receiving any gifts from a lender, guaranty agency or loan servicer.
- A Financial Aid employee is prohibited from accepting compensation for any type of consulting arrangement or contract to provide services to or on behalf of a lender relating to education loans.
- A Financial Aid office employee is prohibited from accepting compensation for serving on an advisory board, commission or group established by lenders or guarantors, except for reimbursement for reasonable expenses.