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|  | POLICY | Motion No. | EXEC 1005-2023 |
| | Disclosure of Conflicts of Interest | Effective Date | 04/18/2023 |
| | | Responsible Department | President's Office |
| | | Attorney Review / Date | [Attorney Name] [Date] |

SCOPE

Members of the Board of Trustees and employees of Pennsylvania Highlands Community College shall disclose any conflicts of interests that will or could be interpreted as benefiting the financial, professional, or political status of the Trustee/employee or their relatives or friends at the expense of the College or which could interfere with their professional duties and responsibilities to the College.

A copy of this policy shall be given to all Trustees and employees upon commencement of such person's relationship with Pennsylvania Highlands Community College. A Trustee or employee shall provide written notice of any conflicts of interest annually, or as any arise, using the disclosure form provided by the College. Failure to complete the disclosure form does not recuse a Trustee or employee of their responsibilities to abide by this policy.

POLICY

Board of Trustees

Board autonomy is vital to exercising independent judgment in carrying out the Board responsibilities of accountability, stewardship, and oversight and acting in the best interests of Pennsylvania Highlands Community College. Board members must be sufficiently independent of any relationships that could interfere with the exercise of independent judgment. Board members should have primary responsibility to Pennsylvania Highlands Community College and shall not allow political or other influence to interfere with governing Board duties.

A Trustee shall provide written notice to the College President and to the Board of Trustees of any conflicts of interest or potential conflict of interests by the first Executive Committee meeting of the calendar year or within one month of his/her appointment or as they occur. Examples of conflicts of interest include, but are not limited to the following:

- a. A Trustee is related to another Board member or College employee by blood or marriage.
- b. A Trustee, relative, close personal friend, or an organization they represent stands to benefit from a College financial or legal transaction including soliciting or accepting gifts (monetary payment, incentive, bonus, employment, commission, etc.) from a supplier/contractor or a potential supplier/contractor for any reason including soliciting favorable treatment. Ordinary business courtesies, such as payment for a modest lunch, are acceptable. Gifts which are promotional items without significant value (less than \$50.00) and which are distributed routinely by the supplier to clients are also acceptable. Additional specific information can be found within the Ethics Policy.

- c. A Trustee has a political relationship that could influence or interfere with Board responsibilities.
- d. A Trustee is a member of the governing body of a financial contributor to Pennsylvania Highlands Community College.
- e. A Trustee applies for employment with Pennsylvania Highlands Community College. Any Trustee who does so shall immediately resign.

Following full written disclosure of possible conflicts of interest, the Board of Trustees shall determine by vote if the conflict of interest interferes with the Trustee's ability to perform his or her Board duties. Votes shall be by majority vote, without the vote of any interested Trustee. A Trustee with a conflict of interest shall not participate in any discussion or debate of the Board of Trustees in which the subject of discussion is a contract, transaction, or situation in which there may be a perceived or actual conflict of interest. However, they may be allowed to provide clarifying information in such a discussion or debate unless objected to by a Trustee.

College Employees

The College encourages employees to be active participants in their community. However, as employees, they must be sufficiently independent of any relationships that could interfere with the exercise of their independent judgment when discussing College issues. Employees should therefore have primary responsibility to Pennsylvania Highlands Community College and shall not allow political or other influence to interfere with their job duties.

All College employee shall provide written notice to the College President of any conflicts of interest or potential conflicts of interest within two weeks of being hired or when any new conflicts of interest or potential conflicts of interest arise.

The College President and members of his/her Cabinet shall complete the disclosure form between July 1 and September 1 of each calendar year and as any new or continuing conflicts of interest or potential conflicts of interest occur.

Examples include, but are not limited to the following:

- a. An employee supervises another employee or student who is related by blood or marriage.
- b. An employee, relative, or close personal friend stands to benefit from a transaction with another organization including soliciting or accepting gifts (monetary, employment, commission, etc.) from a supplier/contractor or a potential supplier/contractor for any reason including soliciting favorable treatment. Ordinary business courtesies, such as payment for a modest lunch, are acceptable. Gifts which are promotional items without significant value (less than \$50.00) and which are distributed routinely by the supplier to clients are also acceptable. Additional specific information can be found within the Ethics Policy.
- c. An employee belongs to another organization which may have conflicting interests or goals to the College.

d. An employee is a member of an organization that is a financial contributor to the College.

The College President, in consultation with his/her Cabinet, shall review any conflict of interest statements submitted by employees. The President shall apply any reasonable corrective action.

The College President shall submit his/her conflict of interest statement to all Cabinet members and to the Board of Trustees for review no later than November 1 of each year.

| Effective Date | Motion Number | Document Author | Description of Change |
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| 04/18/23 | EXEC 1005-2023 | President | Updated language to reflect deleted language from Purchasing Guidance Policy |
| 12/15/2020 | EXEC 1018-2020 | President | Complete Policy Revision |
| 6/25/2013 | EXEC 1008-2013 | Human Resources | Initial Release |