



CONFLICT OF INTEREST POLICY

In general, Molloy College expects its employees to conduct business according to the highest ethical standards of conduct. Employees are expected to devote their best efforts to the interests of the College. Business dealings that appear to create a conflict between the interests of the College and an employee are unacceptable. The College recognizes the right of employees to engage in activities outside of their employment which are of a private nature and unrelated to our business. However, the employee must disclose any possible conflicts so that the College may assess and prevent potential conflicts of interest from arising.

Per Molloy College policy, a possible conflict of interest exists if an employee (or an employee's family member):

- has an existing or potential financial or other interest which impairs, or might appear to impair, that person's independent, unbiased judgment when performing responsibilities to the College.
- has a significant business relationship with a person or firm engaging in, or seeking to engage in, business with the College.
- has a significant ownership interest, and may receive a financial or other benefit from knowledge or information confidential to the College.
- If a Molloy College officer, vice president, trustee, key employee, or highly compensated professional is related to another individual in one of said categories through family or business relationship.
- If a Molloy College officer, vice president, trustee, key employee or highly compensated professional receives compensation from any other organization, whether tax exempt or taxable, related to Molloy College through common supervision or common control.

Employees have an obligation to avoid conflicts of interest or any appearance of conflicts between their personal interests and the interests of the College. Conflicts of interest can arise because of circumstances alone (in appearance) without any action on the part of the employee. However, it is also important to recognize that in some cases the risk to all concerned is so small that the College may agree to accept the existence of the conflict.

Conflicts of interest often relate to situations where an employee uses influence with the College for personal gain.

The College expects that employees will refrain from personal activities which could cause or appear to cause a divided loyalty to the legitimate interests of the College.

- All College officers, vice presidents, directors and employees designated by the President because of their respective duties and responsibilities will disclose to the College, on an annual basis, all business interests, affiliation, and/or relationships that could reasonably

give rise to a conflict of interest involving the College.

- Conflict of Interest Annual Disclosure Statements will be distributed by the Office of Human Resources to all College officers, vice presidents, directors and other employees who may be affected. The Office of Human Resources will be responsible for ensuring that all distributed statements are completed and returned to that office each year.

If an actual or potential conflict of interest is disclosed, the effected employee shall refrain from further participation in matters to which the conflict relates until the question of conflict has been resolved. The Director for Human Resources, in consultation with legal counsel, will review the applicable facts and issues, and, together with the Vice President of the subject employee=s department, will pursue resolution of the conflict after consulting legal counsel. The President, in consultation with legal counsel, will review and determine the appropriate course of action for conflicts affecting all officers of the College.