

## **Code of Conduct Policy**

### **OVERVIEW**

The Keck Graduate Institute (KGI) code of conduct (“Code”) describes principles established to guide all members of the KGI academic community in their institution-related activities. It applies to all trustees, officers, faculty, and staff members. These persons are collectively referred to as “members” or “participants”. Members are expected to abide by these principles, and to advise all consultants, contractors and volunteers under their direct supervision of these principles and the policies applicable to them when working for KGI.

### **STATEMENT OF GENERAL PRINCIPLES**

#### **INTEGRITY AND ETHICAL CONDUCT**

KGI is committed to the highest ethical and professional standards of conduct. Ethical conduct is an integral part of KGI’s mission of education and research aimed at translating into practice, for the benefit of humanity, the power and potential of the life sciences. KGI expects all members to regularly observe and exhibit ethical behavior, honesty, integrity, and good judgment regularly in all facets of their work for and their relationships with KGI. Each member is expected to demonstrate respect for the rights of others and is accountable for his/her actions.

#### **COMPLIANCE WITH LAWS AND KGI POLICIES**

KGI and each of its members must transact KGI business in compliance with all applicable federal and state laws, and regulations, KGI charter documents (by-laws and founding articles), and Institute policies related to their positions and areas of responsibility. Some institutional policies of particular importance are those concerning:

- Financial matters, including appropriate record keeping and internal controls.
- Human resource matters, including equal opportunity employment, prohibitions against harassment of any type (including sexual harassment); and protection of employees against retaliation for good faith reporting of compliance concerns.
- Environmental and workplace health and safety.
- Maintenance of a drug and weapon-free workplace.

These policies are reiterated in the Faculty Handbook and in the Staff Handbook, and on the KGI website. Understanding and following these standards can be complex, e.g., in the areas of procurement (including limitations on the ability to contractually bind the Institute), research, outside interests, and employment matters. In adhering to these policies, members are expected to behave in a manner which respects the rights of others, and to refrain from interfering with, obstructing, or disrupting a normal Institute activity, even while exercising their

own freedom of expression. Managers and supervisors are responsible for teaching and monitoring compliance with laws and policies in their areas of responsibility.

### **REPORTING SUSPECTED VIOLATIONS OR CONCERNS**

KGI's compliance efforts focus on teaching members of the KGI community the appropriate compliance standards for the areas in which they work and on monitoring the observance of those standards. Nevertheless, violations may occur. In addition, members may have questions about compliance. Members are responsible for understanding and resolving compliance issues and securing any required authorizations.

Each member is obligated and actively encouraged to report violations or concerns about possible violations of this Code that come to his/her attention. Managers have a special duty to adhere to the standards set forth in this Code, to enforce the standards, and to recognize, investigate, and report suspected violations.

Disciplinary actions for proven violations of this Code, or for retaliation against anyone who reports violations or concerns about violations or possible violations, will be determined on a case-by-case basis and may include termination of the violator's relationship with the Institute. Individuals who violate this Code may also be subject to civil and criminal charges in some circumstances.

### **HOW TO REPORT A VIOLATION OR CONCERN**

Members may report violations or concerns to their immediate Institute supervisor or Human Resources. Members may also report suspected violations or concerns by using the MySafeCampus website ([www.MySafeCampus.com](http://www.MySafeCampus.com)) or by calling the toll-free number 1-800-716-9007 that connects to a call center available 24 hours a day, seven days per week. Reports may be made anonymously if the reporter so desires. Questions about compliance standards may be directed to the President, the Director of Human Resources, the Vice President of Finance and Operations, or the Chair of the Audit and Risk Management Committee.

The State of California and the Federal Government also provides guidance and protections for people who are considered "whistleblowers". Any employee who, in good faith, voices concerns or has a complaint about suspected violations of the law or KGI are protected under this policy and the State and Federal protections. Please see the State of California's Whistleblower Notice (<https://www.dir.ca.gov/dlse/WhistleblowersNotice.pdf>) and the National Whistleblower Center's FAQ page (<https://www.whistleblowers.org/resources/faq-page/know-your-rights-faq>) for more information.

### **CONFLICTS OF INTEREST**

In some situations, an actual or potential financial or personal conflict, or the appearance of such a conflict, may arise with respect to a particular member's direct or indirect outside interest or relationship and his/her obligation to the Institute. In such situations, the member's

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profit or advantage may come, or reasonably appear to come, at the expense or the well-being of the Institute, or otherwise be in violation of his/her duty of care and loyalty to the Institute. To avoid such situations, the Institute has established a conflicts of interest policy, which is attached to this code as Appendix A, and which can also be found in the Faculty Handbook and the Staff Handbook. Information on when and how to disclose potential, suspected or actual conflicts of interest, and the process for authorizing any such conflicts or exception to the policy, are included in the Faculty Handbook, the Staff Handbook, and at the dedicated KGI trustee electronic site.

### **CONFIDENTIALITY**

The Institute maintains confidential records, both electronically and in hard copy, for a variety of business needs. Records include detailed information about students, job applicants, employees, finances, research and development, donors and prospects and future planning. Many records, such as medical records and student records, must be kept confidential as a matter of federal law. Other information, including social security numbers, must be kept confidential to protect the privacy of individuals doing business with the Institute, or to comply with policies of the Institute, regulators, or third parties. Still other information must be kept confidential to protect institutional intellectual property rights.

Members are expected to protect institutional information by safeguarding it when in use, observing restrictions on its access, storing it properly when not in use, discussing it only in furtherance of the Institute's interest with others who have a legitimate business need to know, and promptly reporting any security/privacy breach. Members uncertain about the use of Institute records and information, including its trade secrets and other intellectual property, should contact their supervisors or the Director of Human Resources.

### **OUTSIDE EMPLOYMENT/CONSULTING/OTHER COMMITMENTS**

Outside professional commitments must not unreasonably interfere with a member's obligations to the Institute. No member shall accept any outside employment or other obligation or opportunity that conflicts with or is reasonably likely to conflict with, or unreasonably interfere with, his or her responsibilities to the Institute or its programs, without full disclosure and approval of the Institute. The outside employment or other commitment or opportunity must also comply with the specific policies and objectives of the Institute with respect to the individual's position at the Institute.

### **PROTECTION AND USE OF OTHER KGI ASSETS**

All members should endeavor to protect the Institute's assets (including its intellectual property) and to ensure their proper and efficient use.

### **INSTITUTE DOCUMENTS AND RETENTION**

Every member of the Institute community is responsible, within the scope of his/her work, for the integrity and accuracy of the Institute's documents and records. No one may falsify or

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improperly alter information on any records or document. Institute documents and records shall be retained in accordance with the law and the Institute's records retention policies. Additional information concerning protecting documents and retaining records is available from the Institute's Vice President of Finance and Operations.

**AMENDMENTS**

Amendments to the Code of Conduct and the Conflict of Interest Policy may be initiated by faculty, staff or the Board of Trustees. Faculty opinions and/or recommendations on the proposed amendments significantly affecting faculty will be solicited before the proposal is brought to the Board for final approval. The Board maintains final authority on all changes to the Code of Conduct and the Conflict of Interest policy.

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Employee's Name (Print)

\_\_\_\_\_  
Employee's Signature

\_\_\_\_\_  
Date