

## CONFLICT OF INTEREST POLICY

SEATTLE UNIVERSITY

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Policy Title:	Conflict of Interest Policy
Policy Owner:	Office of University Counsel
Effective Date:	December 19, 2023
Last Updated:	November 6, 2023
Scheduled Review	December 19, 2025
Related Policies:	See Section VII, below.
Related Forms:	Conflict of Interest Disclosure Form (Appendix A) Conflict of Interest Management Plan Form (Appendix B) EthicsPoint Reporting Tool

### I. POLICY STATEMENT

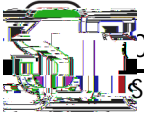
Seattle University (“SU” or “University”) faculty, staff, contractors, and other agents are obligated to act in the best interest of the University in performing their institutional responsibilities. Personal and outside interests must not influence the decisions of University personnel and contractors in performing their institutional responsibilities or providing services to the University. This Conflict of Interest Policy (“Policy”) outlines the requirements for disclosing transactions and business and personal relationships that might generate conflicts of interest, and outlines the required process for disclosing, managing, and/or eliminating conflicts of interest.

### II. PURPOSE & BACKGROUND

Seattle University personnel and contractors are expected to conduct the affairs of the University consistent with high ethical and legal standards and in a manner that furthers the interests of Seattle University, its community, and its mission. As part of this responsibility, the University expects University personnel and contractors to apply their time and efforts appropriately, to use University resources and information exclusively toward University ends, and to avoid or cease actions that may create or appear to create a conflict of interest.

### III. SCOPE

This Policy applies to all University personnel and contractors, as those terms are defined below. It does not apply to University trustees, whose obligations with respect to potential conflicts of interest are



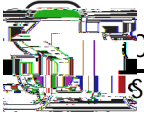
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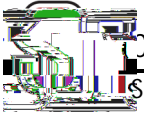


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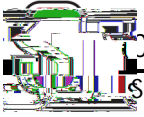
5. Compromising University priorities due to personal interests;
6. Providing unfair access to University programs, services, information, or technology University Q B's É W A S E N H A C / I n f o m a t i o n



2. Investment Relationship Conflicts

- a. No University personnel, or a member of their immediate family, may knowingly directly invest in any investment vehicle in which Conflicts may occur. (16)





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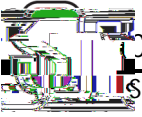
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and the policies and procedures promulgated by the Procurement Office and Office of Sponsored Projects (“OSP”). In determining whether an actual or potential conflict of interest exists and/or must be disclosed, University personnel are responsible for also consulting and complying with such other policies and procedures. If a University community member is unsure about whether a potential transaction, investment, or relationship might create an actual or potential conflict of interest and                      might

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- b. If the reviewer approves the underlying transaction, relationship, or investment, they must also impose a Conflict Management Plan (see subsection 5, below).
- c. If the reviewer is uncertain whether a particular investment, relationship, or transaction is of clear benefit to the University or whether the risks outweigh the benefits, they should consult with the OUC.
- d. In limited circumstances where the reviewer determines that the potential risks outweigh the clear benefit of a particular transaction, relationship, or investment, the reviewer may determine that the potential harm (risks) resulting can be effectively mitigated through a ~~university~~ **university** ~~the~~ **the** ~~T21ToTc4t28~~ **T21ToTc4t28** ~~!~~ **! ~~outweigh~~ **outweigh** ~~in~~ **in****









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\*Appeals to the Board may also be made  
based on objections to the proposed