Responsible Office	Office of the President	Effective Date	06/08/2005
Responsible Official	University President	Last Revision	10/27/2026

CODE OF CONDUCT AND ETHICS

I. POLICY STATEMENT

Fairleigh Dickinson University ("University") occupies a position of prominence, trust and responsibility within the state, the nation and the world. The University's reputation, welfare, and ability to advance its mission rests upon the commitment of every member of the community to act with the highest level of integrity at all times while performing their official duties. Conduct which falls below this standard is inimical to the University and may result in a loss of confidence in the University and its mission by constituencies, stakeholders and publics.

II. PURPOSE OF POLICY

This Code of Conduct sets forth standards which Members of Fairleigh Dickinson University, as defined in Article III, are required to observe when representing the University or otherwise performing their official duties.

III. SCOPE OF POLICY

This Code of Conduct is applicable to members of the board of trustees, executive leadership, faculty members, staff members, fellows, researchers, graduate assistants, teaching assistants, and student employees ("Member of the University" or "Member").

This Policy was written to follow the requirements of all applicable federal and state laws. If this Policy is inconsistent with those laws, or the laws change before it has been updated, state and federal law supersede this Policy. If any provision of this Policy is found to be invalid, illegal, unconstitutional, or unenforceable, this Policy shall be deemed amended to reflect as nearly as possible the original intention of the provision in accordance with applicable law, and that finding shall not affect or undermine the validity of any other provision.

IV. BUSINESS TRANSACTIONS AND RELATIONSHIPS

A. Fairleigh Dickinson University expends substantial amounts of funds in contracting and procurement activities. These activities include purchases, sales, acquisitions, disposals and exchanges of goods, products, services and property. The financial well-being of the

University requires that Members of the University who are involved with the University's business affairs perform their duties with the highest level of integrity. A Member of the University is involved with the business affairs of the University if he or she:

i. conducts, oversees or administers contract, procurement or financial activities;
ii. has decision-making authority over contract, procurement or financial matters;
iii. renders advice or makes recommendations to the University about contract, procurement or financial matters; or
iv. is employed in a unit which conducts, administers or oversees contract, procurement or financial activities.

B. Except as otherwise provided in this article, Members of the University who are involved with the University's business affairs shall not request, solicit, accept or receive gratuities, gifts, money, favors discounts, services, entertainment, kick-backs, inducements, or anything else of value from contractors or vendors for themselves, members of their families, or any third party with whom they are affiliated. (A third party may be a for-profit business, a not-for-profit organization, or a person with whom a Member has a relationship.)

C. Except as otherwise provided in this article, no contractor or vendor shall offer or give gratuities, gifts, money, favors, discounts, services, entertainment, kick-backs, inducements, or anything else of value to Members of the University who are involved with the University's business affairs, or to members of their families, or any third party with which Members are affiliated. This provision shall be a term and condition for doing business with the University and shall be binding upon incumbent and prospective vendors and contractors. The University may terminate its relationship with any contractor or vendor which violates this Code. The University may also bar any contractor or vendor which violates this Code from doing business with the University.

D. Members of the University may accept gifts of nominal value from contractors and vendors so long as such gifts are not offered or accepted to influence official decision-making. The aggregate value of gifts which may be accepted by any Member shall not exceed Five Hundred Dollars per calendar year. Members shall, when practicable, secure approval from their superiors before accepting gifts and shall report receipts of all gifts to their superiors.

E. Faculty members may accept desk copies or instructors' editions of textbooks, treatises, manuals and other educational materials from publishers.

F. The University's financial welfare also requires that Members who are involved in the University's business affairs act without self-interest. Members of the University who are involved in the University's business affairs shall not have conflicts of interest, as defined in the Fairleigh Dickinson University *Conflict of Interest and Nepotism Policy*, with respect to University contracts, agreements or other arrangements for the purchase, acquisition, disposal, sale or exchange of goods, products, services or property.

V. BUSINESS AND PROFESSIONAL ETHICS

A. Consistent with the University's commitment to the highest level of integrity in business affairs, every Member of the University who is involved in the University's business affairs shall, at all times, act in an honest and ethical fashion towards colleagues, superiors, contractors and vendors.

B. Members of the University shall be candid and honest in official communications and shall not knowingly make false or misleading statements to superiors, or the University's auditors and attorneys, or to contractors and vendors.

C. Members of the University who have access to confidential or proprietary information belonging to the University or any other party shall not misappropriate or misuse such information in violation of the rights of owners of such information.

VI. CONFLICTS OF INTEREST

A. Members of the University shall avoid actual or perceived conflicts of interest, as defined in the Fairleigh Dickinson *University Conflict of Interest and Nepotism Policy*, and the *Ethics and Conflict of Interest Policy of the Board of Trustees of Fairleigh Dickinson University*. Members of the University who are involved with the University's business affairs shall not use their positions to influence contract awards or procurement decisions for their personal financial benefit, the financial benefit of members of their immediate families, or the financial benefit of business organizations in which they or members of their immediate families have ownership or equity interests, in accordance with the Fairleigh Dickinson University *Conflict of Interest and Nepotism Policy*.

B. Members of the University shall disclose potential conflicts of interest to the University and shall not vote upon, render advice, make recommendations or otherwise participate in decisions to award contracts to, or procure goods, services or property from entities in which they or members of their immediate families have ownership or equity stakes.

C. Members of the Board of Trustees, officers of the University, and designated members of management shall file written confirmations of conflicts of interest annually with the Executive Committee of the Board. The Executive Committee shall review such reports and disclose the results of its reviews to the full Board.

D. Any member of the University who has a question about conflicts of interest may refer his or her questions to the Office of General Counsel through appropriate channels.

VII. CONFIDENTIALITY

A. Members of the University have access to various forms of highly sensitive, confidential information in the course of performing their official duties. Such information may be confidential by virtue of University policy, agreements with third parties, or state or Federal

laws. Unauthorized uses or disclosures of confidential information by Members may harm persons and expose Members and the University to civil and/or criminal liability.

B. Members of the University shall comply with University policy concerning treatment of confidential information and with all applicable laws, including the Family Educational Rights and Privacy Act (FERPA), governing access to student records; the Health Information Portability and Accountability Act (HIPAA), governing disclosures of private health information; and the Financial Services Modernization Act (also known as the "Gramm-Leach-Bliley Act"), governing disclosures and safeguarding of private financial information.

VIII. NON-DISCRIMINATION

A. Fairleigh Dickinson University prohibits sexual harassment and other forms of harassment and further prohibits discrimination against persons on the basis of race, gender, national origin, age, religion, creed, disability, sexual orientation or military status, with respect to employment opportunities and educational opportunities.

B. Any person who believes that he or she has been discriminated against or harassed in violation of University policy is urged to contact the University's Title IX & Anti-Discrimination Coordinator.

IX. COMPLIANCE WITH LAWS

A. Fairleigh Dickinson University operates within the bounds of many laws. These laws include environmental laws, privacy laws, tax laws, employment laws and civil rights laws. Members of the University shall comply with applicable laws while performing their duties.

B. Members of the University shall not engage in conduct which may subject them or the University to criminal prosecution, civil liability or loss of state or Federal funding. Such conduct includes solicitation or acceptance of bribes or kick-backs to influence official decision-making; solicitation or acceptance of gifts, gratuities, discounts or services from contractors and vendors to influence official decision-making; bid-rigging; submission of false or fraudulent claims to government agencies or other parties; false or deceptive conduct; theft, misappropriation, or unauthorized disclosures of confidential or proprietary information; misappropriation or misuse of assets belonging to the University or a third party; and misappropriation of, or infringement upon, proprietary intellectual property.

X. PROTECTION OF UNIVERSITY ASSETS

A. Members of the University shall engage in reasonable, prudent efforts to preserve and protect University assets from loss, destruction and misappropriation and shall use University assets in accordance with applicable rules, regulations and guidelines.

B. Members of the University who are authorized or approved to expend funds for travel and entertainment shall exercise reasonable, prudent judgment in expending such funds and shall comply with University policy respecting expenditures for travel and entertainment.

C. Members of the University shall prepare and maintain financial reports, accounts, expense reports, payroll records and other financial documents and records in a truthful and accurate fashion and in compliance with University policies and procedures.

XI. ADMINISTRATION

A. Any person may report conduct which he or she reasonably believes violates this Policy by writing to the General Counsel. The Address is:

General Counsel
1000 River Rd., H-DH3-03
Teaneck, NJ 07666

All reports of alleged misconduct shall be investigated and the results of investigations shall be reported to the President and/or Board of Trustees.

B. Reports of misconduct shall be treated confidentially. No Member of the University shall be retaliated against for making a good faith report of misconduct. Any Member of the University who knowingly makes a false report of misconduct shall be subject to discipline.

C. Any Member of the University who violates this Code of Conduct is subject to discipline up to, and including, removal from office or discharge from employment. Disciplinary action shall be taken in accordance with applicable University policies, rules and agreements, which, in the case of faculty, would be the Faculty Handbook of Fairleigh Dickinson University.