



## Policy 4.87 Conflict of Interest

**Responsible Official:** VP for Human Resources

**Administering Division/Department:** Employee Relations

**Effective Date:** April 02, 2007

**Last Revision:** June 22, 2007

### Policy Sections:

- I. Policy Details
- II. Related Links
- III. Revision History

### Policy Details

Emory requires its employees to avoid any business or financial relationship, transaction or event that may be viewed, internally or externally, as a conflict of interest between an employee and an outside party. As provided in the Emory By-laws, relations between Emory and contractors, consultants, vendors, suppliers and other third parties are to be maintained without any direct or indirect personal or financial benefit accruing to any employee of Emory or any member of the employee's family.

Specific circumstances, which may constitute a conflict of interest, include, but are not limited to, the following:

- Holding, either directly or indirectly, a position or financial interest\* in an outside concern which provides services competitive with services rendered by Emory, or an outside concern from which Emory secures goods or services if the employee is involved in or may influence the ordering of such goods or services.
- Competing, either directly or indirectly, with Emory in the purchase or sale of property or property rights, interests or services.
- Disclosing or using non-public information obtained through Emory employment for personal profit or gain or for the profit or gain of an immediate family member.
- Accepting gratuities or special favors, such as meals, airline tickets, hotel accommodations, entertainment, sporting event tickets, etc., from any outside concern that does, or is seeking to do business with Emory, or extending gratuities or special favors to employees of Emory, under circumstances which might reasonably be interpreted as an attempt to influence the employees in the performance of their duties. This does not include the acceptance of items of nominal or minor value (\$40.00 or less) that are clearly tokens of respect or friendship and are not related to any particular transaction or activity of the university, nor does it include business-related social events where the employee is representing the university's interests.
- Retaining, directly or indirectly, consultants who have a financial interest\* or employment that conflicts with services (including sponsored research) provided by Emory.

Any existing or proposed relationship, transaction or other event, which may raise a conflict of interest issue, is to be disclosed to the employee's dean, director or vice president in writing to determine its appropriateness and to receive specific approval to maintain or proceed with such relationship, transaction or event.

\* "Financial interest" as used in this policy does not include ownership of interests in diversified investments (e.g., mutual funds, retirement plans) where the employee or consultant does not control investment decisions, nor does it include non-controlling ownership of securities in large, publicly-held corporations unless the activities of the employee or consultant could have an other than inconsequential effect on the value of such securities. With respect to ownership in start-up and other entities utilizing university intellectual property, the *Policies and Procedures for Faculty Members Involved in Sponsored Scientific Research and Technology Transfer* shall supplement and take precedence over this policy where applicable. Where applicable, governmental regulations regarding conflict of interest shall be followed, as shall other university policies.

## Related Links

- Current Version of This Policy: <http://policies.emory.edu/4.87>

## Revision History

**No previous versions of this policy were found.**

*Emory University policies are subject to change at any time. If you are reading this policy in paper or PDF format, you are strongly encouraged to visit [policies.emory.edu](http://policies.emory.edu) to ensure that you are relying on the current version.*