

Skidmore College's policies regarding the College's business practices under the Standards of Business Conduct, which govern the conduct of all members of the

1. Ethical conduct. Skidmore community members are expected to conduct themselves ethically, honestly, and with integrity in all business dealings. They are expected to be fair and open to all, with no bias or prejudice, and to act in a loyal and professional manner. Skidmore community members, donors, and

2. Respect for others. All members of the Skidmore community are expected to respect the rights and dignity of others regardless of their differences and must abide by the principles of nondiscrimination and harassment adopted by the College.
3. Individual responsibility and accountability. Skidmore community members are expected to assume and exercise responsibility appropriate to their positions and roles. Community members are accountable to each other, to the College, and to themselves for their actions and their decisions not to act. They are expected to exercise sound business judgment in the performance of their responsibilities, to the best of their ability. When roles or responsibilities are unclear, individuals should take it upon themselves to obtain clarity. (See below, "Further guidance on this policy.")
4. Conflicts of interest. The College recognizes that community members exercise responsibilities in a variety of roles, including consulting and other external activities. These activities contribute to professional development of individuals, support Skidmore's educational mission, and enhance the reputation of the College. In all of these activities, community members engaged in College business must consider in advance and avoid improper conflicts of interest. Conflicts of interest must be disclosed, reviewed, and either eliminated or resolved appropriately with written documentation. The College's expectations

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ATTACHMENT A

SKIDMORE COLLEGE CONFLICT OF INTEREST POLICY

I. PRINCIPLES

Skidmore College is committed to the highest standards of excellence and integrity in

considers vital. It is sometimes difficult to recognize the possibility for conflicts between the responsibilities of an individual to Skidmore and to external organizations. Under these conditions the possibility of a perceived or real conflict of interest is significantly heightened.

In pursuit of its own mission, and consistent with the requirements of external agencies, particularly the federal government, Skidmore College has formulated the following policy to identify and address potential, actual and apparent conflicts of interest. This policy is intended to increase the awareness of members of the Skidmore College community to the potential for conflicts of interest and to establish procedures whereby such conflicts may be avoided or resolved appropriately

II. CONFLICT OF INTEREST DEFINED

A. Recognizing a Conflict of Interest

Typically, a conflict of interest has the potential to arise when an individual has the opportunity to influence the College's business, administrative, academic, or other decisions in ways that could lead to personal gain or advantage of any kind. Such a

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member's Family or a Related Person) has an external financial interest or fiduciary or

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individual to modify the conduct of

research as well as College financial decisions and calling into question the integrity of an individual or the College or both. For this reason, it is important for an individual, in evaluating a potential conflict of interest, to consider how others might perceive it. Apparent conflicts must be recognized and avoided.

C. Examples of Activities Not Requiring Disclosure and of Potential Conflicts of Interest

Examples of activities not requiring disclosure and of activities that suggest a potential conflict of interest appear at the end of this policy.

III. PROCEDURES FOR DISCLOSING AND RESOLVING CONFLICTS OF INTEREST

The responsibility for avoiding conflicts of interest rests, in the first instance, with the individual. An essential step in addressing an actual or apparent conflict of interest is for the individual involved to make full disclosure of relevant information to the appropriate supervisor or administrator. As described in greater detail below, certain individuals are required to make regular, annual disclosures, with updates as needed; others need only disclose on an ad hoc basis. When a disclosure is received, the appropriate individual will review it and in consultation with the individual making the disclosure, determine what, if anything, should be done to avoid or resolve appropriately any conflict.

A. Disclosures

1. Required annual disclosures

- a. Members of the College's Board of Trustees (including the President) are fiduciaries and owe special duties of care and loyalty to the institution as a whole and must keep the College's interests paramount to all others. Trustees are required to submit the Conflict of Interest Disclosure Form on an annual basis. The Vice President for Finance & Administration and Treasurer shall be responsible for administering the annual review of Trustee conflict of

President, appropriate Cabinet member, or designee is responsible for administering the conflict of interest review for such individuals and, in consultation with an individual making a disclosure, for eliminating or resolving conflicts as necessary.

- d. Individuals in one or more of the following categories must submit annually a Conflict of Interest Disclosure Form to the Dean of the Faculty/Vice President for Academic Affairs
 - i. All faculty members serving as department chairs or program directors.
 - ii. All faculty members and non-faculty personnel who are responsible for or who could materially influence the design, conduct, or reporting of externally funded research

The Dean of the Faculty/Vice President for Academic Affairs is responsible for administering the conflict of interest review for such individuals and, in consultation with an individual making a disclosure, for eliminating or resolving conflicts as necessary.

2. Required disclosures other than in annual disclosure process

- a. Anyone who has an actual or apparent conflict as defined in this policy and has not previously completed an annual disclosure form must complete a form at the time the actual or apparent conflict arises.
- b. Material change from annual disclosure. Whenever significant financial interests, external activities, or internal responsibilities change materially from those described in the annual disclosure, the disclosure must

are required, however, on an ad hoc basis, to disclose actual or apparent conflicts of interest relating generally to any grant, contract, or other agreement in the College extramural research portfolio, College financial decisions, and other matters whenever they arise. If there is any doubt about the existence 7-10(a)4(nppa)4(r)hocual

CONSEQUENCES OF VIOLATION

Violations of this policy may result in disciplinary consequences, up to and including dismissal of the College in accordance with Faculty Handbook, the Exempt and Non-Exempt Employee Handbook, and other employee contracts.

EXAMPLES: ACTIVITIES NOT REQUIRING DISCLOSURE AND POTENTIAL CONFLICTS OF INTEREST

The following examples are intended to be illustrative and are not exhaustive.

Examples of Activities Not Requiring Disclosure

The following activities do not require disclosure as an actual or apparent conflict of interest under the terms of this policy.

1. Receiving honoraria, stipends, or royalties for published scholarly works and other writing, creative works, lectures, or presentations.
2. Participating in professional conferences for the purposes of making scholarly presentations or conducting seminars or workshops.
3. Receiving honoraria for service as a special reviewer or on a review panel for academic, governmental, or not-for-profit organizations.
4. Receiving royalties under the College's or another academic institution's royalty distribution policies.
5. Preparing books, articles, software, or creative works relevant to College duties.
6. Earning income from passive investments such as interest or dividends from banks, mutual funds, or stocks and bonds.
7. Receiving salary or consulting fees in an amount not to exceed \$5,000 per year for services provided to an outside entity or organization, unless payment from such person(s) or entity(ies) would result in an actual or apparent conflict of interest.

Examples of Potential Conflicts of Interest Requiring Disclosure and Resolution

Since conflicts of interest are sometimes difficult to recognize, Skidmore community members are expected to discuss potential conflicts of interest with the appropriate department chair, program director, supervisor, or Dean or Vice President. Examples of

¹ Activities not requiring disclosure under the terms of this Conflict of Interest Policy could constitute a conflict of commitment if they interfere with an individual's responsibilities to the College. See Skidmore College Standards of Business Conduct Policy paragraph 5 (Conflicts of Commitment) and the College's Conflict of Commitment Policy.

potential conflicts of interest that must be disclosed and either eliminated or resolved appropriately include but are not limited to the following:

1. Using College resources to conduct research that is sponsored by an entity in which the individual, his or her Family member, or a Related Person has a material financial interest.
2. Serving in an executive or managerial capacity or holding a material financial interest in for-profit or not-for-profit entities doing business with the College.
3. Serving on the board of directors or a major advisory committee of an external entity that sponsors an individual's research or provides gift funds for the use of the individual or his or her department or program.
4. Engaging College community members in consulting activities, activities supported by gift funds, or research sponsored by an entity in which the individual has a financial interest.
5. Conducting testing of products, devices, or services owned or controlled by a business in which the individual, an individual's Family member, or a Related Person has a financial interest or received remuneration.
6. Diverting research opportunities from the College to another academic institution, governmental laboratory, business, or consulting entity.
7. Directing purchasing opportunities to a family-owned company or an associated entity.
8. While acting in the context of his or her College duties, making professional referrals to a business in which an individual, an individual's Family member, or a Related Person has a financial interest.
9. Conducting business activities involving students or members of the College's faculty or staff.

ATTACHMENT B

SKIDMORE COLLEGE CONFLICT OF COMMITMENT POLICY