HAVERFORD COLLEGE Administration and Finance Division

COLLEGE BUSINESS STANDARDS

Section 1. Overview. College employees in administrative and financial operations play a key role in assuring that high standards are utilized in safeguarding the custody and use of an institution's resources. The employee's personal and professional conduct reflects on his or her institution, the collective profession, and the higher education enterprise at large. The set of <u>College Business Standards</u> that are outlined herein are established to assist employees in the Administration and Finance Division (the "Division") to both recognize and appropriately manage a variety of business practices or ethical issues as they may arise.

Employees in the Administration and Finance Division are involved in making important business decisions on behalf of the College every day. This includes interacting with other College employees, students, a host of external parties including vendors, plus the oversight and preparation of financial, operating and administrative reports, purchasing materials or supplies, and many other functions. Administration and Finance employees have a responsibility to the College's Board of Managers, the Corporation of Haverford College, donors and funding agencies, students, faculty, staff, and the broader community to ensure that the highest standards of ethics, integrity, and fairness are maintained in all such activities.

It is imperative to provide the utmost level of confidence in financial, operating, administrative and business processes.

Section 2. Conflicts of Interest. The Business Office's Conflict of Interest Policy is included in the Accounting and Business Policies and Procedures Manual (the "Manual") and operates in concert with, and in support of, the Conflict of Interest policy in the Haverford College Employee Handbook (the "Employee Handbook"). Strong business standards and conflict of interest policies are necessary for a successful organization. This set of College Business Standards for the Division are intended to complement the Conflict of Interest Policy in the Manual and the Employee Handbook.

Each employee should always act with honesty and integrity and avoid actual or apparent conflicts of interest between personal and professional relationships. College employees should refrain from making decisions when they may benefit the employee personally or the employee's family, directly or indirectly.

In addition, Haverford College's requirements must take priority over those of any other employer. Outside business activities should be disclosed to the immediate supervisor. In order to comply with this Business Standard, direct or indirect conflicts of interest or any situation which might give the appearance of a conflict should be disclosed to the immediate supervisor.

In personal dealings outside of the College, disclose (as reasonably necessary) that you are acting personally in such endeavors and not on behalf of the College.

<u>Section 3. Competitive Bidding and Fair Treatment for All Vendors.</u> Unless there is a compelling reason to do otherwise and that reason is discussed in advance with the employee's supervisor, each employee should use appropriate and competitive bidding practices for all suppliers, service providers, and vendors for services utilized and products purchased by the College.

In this process, all competitive vendors, suppliers, and/or service providers are given equal and full consideration to the extent that appropriate laws, regulations, and College policies permit. Bids should be evaluated fairly, and pricing, terms and conditions of one bidder are not shared with other bidders. By fully utilizing these appropriate competitive bidding practices, products and services or other College purchases should be rarely sourced by a single vendor.

Independent investigation, analysis, and due diligence should be conducted for all service providers, vendors, and contractors prior to their selection. Division employees are expected to manage all vendor and professional relationships for the benefit of the College and critically evaluate cost-effective alternatives when feasible.

Employees must continually maintain the College's interests in dealing with all vendors for the purchase of all products or services and ensure that appropriate contracts are negotiated and competitive pricing is realized.

Section 4. Business Meals, Activities and Gifts. A business meal or activity occurs when a service provider, vendor, or supplier meets with the employee in person and College business is actively discussed. It is possible that the business discussion could occur during a meal or a round of golf or a similar event. These off-campus business meals or activities must be infrequent, local, and modest.

A "gift" is an item received from a service provider, vendor, or supplier (e.g. a book, a food basket, etc.). A ticket to a local sporting event or other similar activity where the vendor or supplier is *not* in attendance is also a gift since College business cannot be discussed at the event or activity. In addition, even when the vendor is in attendance, any ticket or meal provided to persons affiliated with or related to the employee (e.g. employee's spouse or partner, dependent, friend, etc.) is also considered a gift to the College employee since these other individuals are not conducting College business. Any gifts that are accepted by the College employee must always be occasional, reasonable, and appropriate and can never have an aggregate value in excess of \$100 per fiscal year from a given service provider, vendor or supplier. The retail value of any gift item (e.g. food basket, book, sporting event ticket or meal to all others, such as a spouse, dependent, friend) are also fully applied against this \$100 per year limitation to the College employee. It is the employee's responsibility to know or reasonably ascertain the value of any gift received.

Other potential business items, provided by a service provider, vendor or supplier, such as tickets to non-local sporting events, free airfare, resort/hotel accommodations, or similar activities, should not

be accepted, even if the vendor is in attendance, since the activity is neither local nor modest. Reasonable meals provided by a service provider, vendor or supplier while the employee is at a non-local conference and the vendor or supplier is in attendance is permitted so long as the meal remains modest and the provision of such infrequent. For the purposes outlined herein, a service provider, vendor or supplier is any for-profit entity or person doing business with the College or pursuing business with the College.

In terms of limitations on gifts from one College employee to another College employee, an employee may not give gifts to his or her their supervisor worth more than \$100 in any fiscal year.

Section 5. Laws, Regulations and College Policies. Each employee in the Administration and Finance Division should be knowledgeable of and strictly comply with all laws, rules, and regulations of federal, state, and local governments. All employees must comply with all College policies and guidelines unless such College policy is temporarily and specifically waived by the employee's supervisor and the President of the College or the Senior Vice President of Administration and Finance.

Section 6. Administrative Management and Reporting of Accurate and Timely Information. Division employees are expected to ensure that all College financial, administrative and operating reports are accurate, understandable and timely. Verification of information sources is expected prior to recording or reporting data. It is imperative to ensure data integrity within the College databases, including Workday, Kuali, Peoplesoft, PowerFaids, Slate, School Dude, and Admin or other systems as may be applicable from time to time.

Division staff are expected to process invoices and similar items on a timely basis. Purchase order requisitions should be thoroughly completed, and purchasing requirements and procurement procedures must be adhered to. Invoices, receipts, or other similar paperwork from any vendor may not be modified or altered without the specific consent of the President of the College, or the Senior Vice President for Administration and Finance, or the Associate Vice President and Controller, or the Director of Accounting and Senior Associate Controller.

Paperwork that is known to be false, misleading, or without material information must not be submitted.

Section 7. Confidential Information. Personnel information maintained in Workday, Admin or other sources may not be revealed except for appropriate College purposes. This information must not be shared with other employees unless it is specifically necessary for their job responsibilities. It is expected that Division staff will be continually vigilant about the protection and security of confidential, sensitive and private information.

Conversations about confidential information may not happen in a public setting where they might be overhead. Confidential and private information must be secured in the office, or as otherwise appropriate. Information stored on College computers must also be appropriately protected. IITS policies regarding confidential and private information must be strictly followed, and copying of unauthorized software or other resources is not permitted.

Section 8. College Assets and Resources. Inappropriate use of College computers, systems or equipment is not acceptable at any time. Without the prior approval from the President or the Senior Vice President for Administration and Finance, there should be no partisan or political use of any College assets including computers, telephones, copy machines, printers, fax machines, letterhead or other resources.

Section 9. Professional and Inclusive Work Environment. All Division staff are responsible for sharing in the creation and maintenance of a professional, inclusive and conducive work environment and one that safeguards the health and welfare of all fellow employees. Division staff may not use a position of authority, familial relationship or friendship with other employees to attempt to circumvent College policies and may not discriminate or provide any form of favoritism in hiring practices or in any other employment circumstance.

Adherence to all Human Resources guidelines, policies, and practices, as outlined in the Employee Handbook is expected. Strict compliance with all federal, state, and local laws, guidelines and requirements is required. It is expected that staff will be tolerant of views of others and establish a work environment that supports all individuals, always treating co-workers and other colleagues with respect, fairness and good faith.