

DEPAUL UNIVERSITY

CODE
of CONDUCT



*Integrity
Accountability and
Dignity*

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DePaul University has always been, and still remains, committed to conducting its business with great integrity, accountability and dignity. The university is faced with the challenge of operating in an increasingly complex environment in which governmental and legal oversight is growing more and more stringent.

To help address such challenges, DePaul University has developed a Code of Conduct. The Code of Conduct highlights the policies most critical to working in higher education and at DePaul. Every DePaul employee (including faculty, staff, and student workers, full-time and part-time employees) is governed by the material in this document.

The Code of Conduct is also a compliance tool that's not just about following the letter of the law, but about creating an impact on the university's environment and its employees' ethical behavior. To this end, DePaul can illustrate to the university community exactly what its expectations are for its employees.

By being a part of DePaul's community, it is our responsibility to be good stewards of its resources. Your dedication to the university's mission and its ethical standards contribute to DePaul's overall success.

PURPOSE

The purpose of the Code of Conduct is to reiterate the fundamental expectations DePaul University has for every one of its faculty and staff members. Employees of DePaul are charged with upholding the Vincentian mission and values of the university's namesake, St. Vincent de Paul. Members of the DePaul community are expected to be honest and responsible with the university's resources, to treat each other with dignity and in a collegial manner, and most importantly, prepare DePaul's students for a fulfilling and successful life ahead.

The Code of Conduct is meant to be used in several different ways. It can serve as a quick reference to personal and business conduct questions, a starting point for familiarizing faculty and staff with university policies, or as a way to learn how local, state and federal laws and regulations impact the way business is conducted at DePaul.

In addition to statements relating to certain conduct policies, the Code gives sample situations in which the policies apply. These samples serve as scenarios to clarify the university's stance on certain policies.

All DePaul employees are responsible for knowing and adhering to the policies mentioned in the Code of Conduct, in addition to its sources, the Management Standards Handbook, the Faculty Handbook and the university's Policies and Procedures website. Faculty and staff must also abide by all applicable local, state and federal laws. Any allegations of wrongdoing will be immediately and fairly investigated,

and any persons involved in the allegations will be removed from decisions relating to that issue.

As changes and additions are made to the Code's source materials and applicable laws, the Code will be updated and available online at compliance.depaul.edu.

DePaul's policies are often updated, and new policies are continually being considered. For the most up-to-date conduct policies, visit policies.depaul.edu.

INSTITUTIONAL COMPLIANCE PROGRAM

DePaul University expects its faculty and staff to properly handle and protect its financial resources, operations, strategies and reputation. To do this, the university's Audit Committee of the Board of Trustees agreed to develop a university-wide compliance initiative, and soon after, the Office of Institutional Compliance was formed.

The Executive Vice President serves as DePaul's Chief Compliance Officer, responsible for the development and administration of the university's Compliance initiatives.

The department's purpose is to foster a culture of compliance and accountability that is consistent with DePaul's mission. The compliance program addresses a number of university activities that largely fall under the framework of "Managing our Business" and "Managing our Risk."

REPORTING SUSPECTED NON-COMPLIANCE

Employees with supervisory or fiscal responsibility have a responsibility to report conduct related to university activities and business that violates civil laws, university policies or DePaul's Code of Conduct. Community members who are not in a supervisory role or do not have fiscal duties are strongly encouraged to also report such conduct.

DePaul University takes allegations of misconduct seriously. Individuals who knowingly make intentionally false or purposefully misleading allegations of misconduct will be subject to appropriate disciplinary action, which may include termination of employment.

Any concerns regarding compliance or alleged compliance violations should be addressed through managerial channels when appropriate. However, if there is an instance where a manager is part of the alleged non-compliance, or if an employee feels uncomfortable seeking resolution this way, he or she should report the concerns using one of the following methods:

- A letter stating an alleged impropriety can be mailed to Compliance and Risk Management 1 E. Jackson Blvd., 8th floor, Chicago, IL, 60604. Or the letter can be emailed to compliance@depaul.edu.
- The compliance department can be called directly regarding any questions or concerns. The department's number is (312) 362-6880.
- Other resources exist at the university, depending on the situation:
 - The Office of the University Ombudsperson (for confidential discussions or support): (312) 362-8707
 - Internal Audit: (312) 362-8392
 - Office of Institutional Diversity and Equity: (312) 362-6872
 - Human Resources: (312) 362-8500
 - Public Safety Office: (312) 362-8400, (773) 325-7777
 - Misconduct Reporting Anonymous Hotline: (877) 236-8390
 - Web intake site: depaul.ethicspoint.com

REPRESENTING THE UNIVERSITY

Contacts with the media

DePaul's faculty and staff may be contacted by reporters seeking expertise or university information. Faculty members are encouraged to participate in interviews that draw upon their academic discipline to comment on important issues of the day. Faculty should be clear with the interviewer that they are expressing personal views and are not speaking on behalf of the university. Faculty and staff members who are asked by reporters to provide information about DePaul's students, administration or operations should consult with a member of the Media Relations department prior to engaging in the interview to determine the appropriate person to give the interview and/or to obtain mutual agreement on topics to be addressed.

DePaul's campuses are considered closed to the media unless Media Relations approves a reporter's presence and alerts Public Safety. Approvals are often given to accommodate faculty interviews and routine university news coverage.

For more information, contact the Media Relations Department or visit: newsroom.depaul.edu/ContactUs/index.html

Q: Does Media Relations arrange advertising or create marketing materials for university programs?

A: University Marketing Communications handles paid advertising and marketing for the university. Media Relations helps promote DePaul's position and prominence in newspaper, broadcast and Web media stories by working with the media and coordinating interviews, coverage and other related activities.

Response to external legal, law enforcement, government or other outside inquiries

Any employee receiving a subpoena, summons, wage garnishment or other legal request, on behalf of the university, must immediately contact the Office of the General Counsel. The General Counsel's office handles the release of legal documents when such requests are appropriately made. The requests generally require the university to respond within a very short period of time.

For policy information, contact the Office of the General Counsel or visit: generalcounsel.depaul.edu

Q: What should I do if a government agent requests student or employment records, but does not have an authorized consent form for such records?

A: Government agents do not always have the right to such records and, therefore, all requests should be referred to the Office of the General Counsel.

Contracts and agreements

Executive officers, academic officers and administrative officers of DePaul, or their specific designees, can negotiate and execute contracts within their appointed areas of expertise. However, all DePaul employees must follow the university's Contract Requirements and Procedures policy which provides thresholds for negotiation and execution authority and identifies contracts that require a legal review.

For example, some contracts must be approved and executed by an executive officer. Such contracts include those governing activities in more than one officer's area of competence and responsibility, those that are for a duration of more than three years, those establishing an exclusive relationship with the other party, and those containing an automatic renewal provision.

To review the Contract Requirements and Procedures policy, visit: policies.depaul.edu/policy/policy.aspx?pid=81

Q: Must all contracts be submitted to the Office of General Counsel for legal review?

A: No. Most contracts under \$50,000 do not need to be submitted for a legal review. All special-risk contracts must be submitted for legal review, regardless of the dollar value.

Grants and Contract Proposals for External Funding

The submission of a grant or contract proposal for external funding constitutes a formal transaction between DePaul and the funding organization or agency. For that reason, proposal submissions must be handled by the appropriate departments at DePaul. The Office of Development is responsible for providing clearance to DePaul faculty and staff to formally cultivate and solicit private funders. The Office of Research Services coordinates the proposal review and approval for all grant and contract proposals, regardless of their funding source.

For policy information, visit: policies.depaul.edu/policy/policy.aspx?pid=122

Submit your proposal for review using the Web-based Proposal Review Form located at: ospr.depaul.edu/html/grant/proposal_review_form.html

Q: After making a presentation at a professional conference, a representative from ABC Foundation, a private granting agency, requested that I discuss with them the possibility of submitting a proposal in support of my project. How should I move forward with this request?

A: Contact the Office of Foundation Relations in the Development Office to discuss clearance requirements for the ABC Foundation, and for possible assistance in submitting the request. To initiate this process go to Foundation Relations' website at alumni.depaul.edu/GiveToDePaul/FoundationRelations/ForStaff.

Q: A colleague of mine is a program officer with a state agency. She encouraged me to send her a proposal for a research project we have been discussing. The deadline is quickly approaching, so I need to send it to her by the end of the week. Can I send her the proposal and copy the Office of Research Services?

A: No. To be eligible for submission, the proposal must pass through the review and approval process coordinated by the Office of Research Services. To expedite the process, immediately inform the Office of Research Services of the tight deadline and submit your proposal for review as soon as possible using the Web-based Proposal Review Form located at: ospr.depaul.edu/html/grant/proposal_review_form.html.

Donations from the university

It is generally inappropriate for any member of the faculty or staff to make gifts or donations in the name of DePaul, to individuals, groups or organizations. In certain circumstances, however, it may be in the university's best interest to make such gifts or the university may take part in a benefit or civic function that requires tickets to be purchased. Approval for exceptions to the general policy must be secured from the Provost, the Executive Vice President (EVP) or the appropriate Vice President(VP)/Dean.

For policy information, visit: policies.depaul.edu/policy/policy.aspx?pid=45

Q: A member of our department has been battling an illness, and we'd like to make a donation to an affiliated charitable organization. Can we use university funds for the donation?

A: University funds cannot be used in such a way, unless approved by the EVP, VP or Dean.

Honoraria

An honorarium is a payment made to an individual, who is not an employee of the university, for services when payment of fees is not legally or traditionally required. The intent of an honorarium payment is to show appreciation for participation in university educational, research or public service activities or events. Payment is limited to guest speakers and individuals offering other non-commercial services that would not be expected to generate an invoice or formal request for remittance.

To qualify for an honorarium payment, a service must be characterized by all of the following :

- The service is provided on a one-time or highly infrequent basis,
- The service provided has no tangible, deliverable product, such as a performance or speaking engagement,
- Payment for such services is not the recipient's primary source of income
- Payment is generally considered to be a token of appreciation rather than an obligation.

Due to tax compliance requirements, all honoraria are to be coordinated through the Manager of Accounts Payable or the Tax Manager.

For policy information, visit:
policies.depaul.edu/policy/policy.aspx?pid=46

Q: We have a faculty member from another university producing a paper for our department at DePaul. Should I pay him an honorarium or as a consultant?

A: Since the paper is a durable product, the faculty member should be paid as a consultant. To verify payment options, contact the Manager of Accounts Payable or the Tax Manager.

Athletics

As a Division I member of the National Collegiate Athletic Association (NCAA) and the Big EAST Conference, DePaul University is responsible for compliance with the rules both organizations set forth. Some of the most important and sensitive rules include:

- Student-athletes should be treated in the same way as other students and may not receive any “extra benefit” generally not available to all students. Student-athletes cannot be given cash, loans or gifts of any kind, including birthday or holiday gifts by faculty or staff.
- **At no time should an image of a student-athlete be used for any university or other publication without the express permission of the Compliance Office of the Athletic Department.** Student-athlete amateurism is strictly enforced. It prohibits interactions with agents and professional teams, and the use of a student-athlete's name or likeness to promote commercial entities.

For policy information on the Use of Intercollegiate Athletics Photographs visit:
policies.depaul.edu/policy/policy.aspx?pid=283

Off-campus recruitment of prospective student-athletes is limited to coaches and Athletic Department staff, and other DePaul faculty and staff may only become involved in the recruitment of prospective student-athletes when the prospect is visiting one of DePaul's campuses. A prospective student-athlete is a person who has begun ninth grade classes.

- Recruiting restrictions also extend to prospective student-athletes' friends, family and coaches. If a faculty or staff member encounters a coach or an Athletic Department staff member with a prospective student-athlete or family member, other than on campus as noted above, he or she should not approach or speak with them. In

addition, faculty and staff may not provide free or discounted tickets or transportation to any games or events to prospective student-athletes or their friends, family or coaches.

For more information, visit the [Athletic Department's compliance website at: depaulbluedemons.com/compliance](http://depaulbluedemons.com/compliance)

Q: I am collecting donations for a silent auction to benefit my church's high school. May the Athletic Department donate tickets?

A: No. NCAA rules prohibit the Athletic Department from making contributions that may benefit prospective student-athletes in any way, including charitable contributions to high schools and community colleges.

University websites

To maintain a consistent DePaul brand and image, the university has several standards for its websites. Web pages should have a primarily white background and the content should be clear, up to date, and easy to read. All sites should provide an e-mail link to a webmaster/site manager. Sites must also include a copyright and disclaimer line with links at the bottom of the page and links to the DePaul home page on each page. The site's home page should have the Tree of Wisdom logo and DePaul signature, and a DePaul text link.

Any website content that resides on university servers should be related to university business and should not contain pornographic or obscene material, or links to these materials.

DePaul's website includes official pages, or those sanctioned by the university, and unofficial pages, or those not sanctioned by DePaul. These include staff, faculty, student organizations and personal student pages. DePaul has no control over and is not responsible for the accuracy or completeness of any unofficial page. The views and opinions expressed on any unofficial pages are strictly those of its author.

For photos on university websites, a signed photo release for each student or non-employee in the image and copyright permission from the photographer is required. Photographers often have different rates for various uses; an additional fee may be required to use a photo from a brochure on the Web. Permission from Enrollment Management and Marketing must be obtained prior to using any images from the university website or print publications. Unauthorized use of third-party photos can result in copyright infringement. For questions regarding photos and copyright, contact the Director of Enrollment Communications in Marketing Communications.

For website branding information, visit: brandresources.depaul.edu

For policy information on the Use of EM&M marketing photographs visit: policies.depaul.edu/policy/policy.aspx?pid=277

Photo releases may be obtained at: <http://generalcounsel.depaul.edu/Forms/Photo%20Release%20Form.pdf>

A sample photographer agreement may be obtained at: brandresources.depaul.edu/downloads/Sample_Contract_Letter.pdf

Q: Are there any restrictions on the use of photos on my website?

A: No, not as long as the photos are of good quality, and you have a signed photo release form for each person who will appear on the site. In addition, DePaul must own the copyright on all photos used. Unauthorized use of third-party photos can result in copyright infringement. Photo release forms and other information regarding copyright, are available through Enrollment Management and Marketing.

CONFIDENTIAL & SECURE INFORMATION

Confidential information

DePaul is committed to protecting the privacy of its employees, both during and after their service at the university. Whether employment information is sought from bona fide agencies, such as banks or mortgage companies, or from potential future employers, DePaul is careful to release only valid and pertinent information to appropriate requests.

For policy information, visit:

policies.depaul.edu/policy/policy.aspx?pid=199

Q: I am applying for a mortgage and was wondering what type of information DePaul would release about me.

A: The university prefers that all requests for employee information be made in writing, ensuring that all requests are made by bona fide agencies. Employee authorization should be obtained for any release of employee information. If employee authorization is not obtained, information given to third parties must be limited to present employment status, current job title and dates of employment.

Similarly, DePaul carefully maintains and protects all employees' health information, required by the Health Insurance Portability and Accountability Act, or HIPAA.

Q: I have requested a medical leave and qualify for Short Term Disability (STD). What information is my department management given on my medical leave?

A: The department will receive a notice indicating the requested leave dates and the approved leave period. To protect employee health information as required under HIPAA and as required by the university's Health Information Privacy policy, no information on the medical condition of the employee is provided to the department.

For policy information, visit:

policies.depaul.edu/policy/policy.aspx?pid=84

Family Educational Rights and Privacy Act

A student's personal information and academic records are protected under the Family Educational Rights and Privacy Act (FERPA). FERPA allows students to inspect and review their educational records, amend their educational records when appropriate, and have control over the disclosure of information from those records.

Educational records contain information directly related to a student, and are usually maintained by an educational agency or institution. These records include: files, documents, and materials in various mediums such as handwriting, print, tapes, disks, film or microfiche.

Educational records do not include "sole possession" notes, law enforcement unit records, records exclusively for employees (except for student employees whose records are under FERPA), doctor-patient privilege records and alumni records. Sole possession notes are made by one person as an individual observation or recollection and are kept in the individual's possession. Sharing notes with another person or placing them in an area where they can be viewed makes them educational records and subject to FERPA.

Directory information may be disclosed by DePaul, as well as other universities. Directory information includes the student's name, addresses (including e-mail), telephone number, date of birth, major, year in school, dates of attendance at the university, and full- or part-time status. This information may be disclosed, unless the student has specifically requested the information not be released.

Although DePaul may release directory information, the university is aware of the potential of identity theft and therefore does not disclose this information indiscriminately.

For policy information, visit:
policies.depaul.edu/policy/policy.aspx?pid=281

policies.depaul.edu/policy/policy.aspx?pid=110

Q: If a student indicates that he or she does not want any information disclosed by the university, how should the university respond?

A: The university cannot release any information on that individual.

Information technology, security and confidentiality

DePaul University information systems and the data these systems contain are a university resource of significant importance and value. Much of the data is confidential and sensitive, and therefore, must be safeguarded from unauthorized use and access. The university's policies and procedures serve to ensure that system data, as appropriate, are accessible for the effective management and legitimate educational purposes of the university, while protecting the privacy of the individual and the confidentiality and integrity of the data. Thus, system access and data security procedures have been established to serve this end.

For more information, visit: policies.depaul.edu/policy/policy.aspx?pid=85

Q: While I was on vacation, my supervisor used my computer and accessed some personal information I have stored on the hard drive. What can I do to prevent this kind of "snooping" in the future?

A: DePaul University values the privacy rights of individuals using its computing resources. While DePaul does not routinely monitor individual usage of its computing resources, users should be aware that all computing resources are the property of DePaul and may be accessed or monitored as necessary in the course of conducting university business. Users who wish to maintain absolute privacy of information should transmit and store that information on or through media other than DePaul computing resources.

Acceptable use of technology

DePaul University provides an array of computing resources to students, faculty, and staff, including e-mail, web hosting, and Internet connectivity. These resources are needed to provide educational access to the Internet, perform research and development, conduct business procedures and provide cost-effective communication. The university encourages the use of computing resources at DePaul while adhering to local, state and federal laws governing computer use.

Violations may include actions such as: harmful actions towards minors, threats, harassment, forgery, unsolicited e-mail, unauthorized access, collection of personal data, reselling services, service interruptions, physical security, and copyright and trademark infringement.

For policy information, visit: policies.depaul.edu/policy/policy.aspx?pid=116
policies.depaul.edu/policy/policy.aspx?pid=85

Q: I suspect that someone in my office is using their PC to conduct illegal activities that violate the university's Acceptable Use/Network Security Policy. What should I do?

A: Report the alleged illegal activities to your supervisor or to the DePaul University Computer Security Team by email at abuse@depaul.edu. When reporting violations of acceptable use, please provide the following information:

1. The date and time of the alleged activity
2. Detailed descriptions of the alleged activity
3. Detailed descriptions of the effects which were incurred due to this activity.

Passwords for systems and websites

A computer password is the first level of defense in protecting your computer, electronic files and other data. Many attacks against computers rely on weak passwords based on dictionary words and birthdates. A better way to protect data is to create strong passwords for any system or site that requires a password. Recommendations can be found at:

is.depaul.edu/security/information_security/Password.asp

Q: Is it acceptable to share your password when you are in a crunch for time or will be out of the office?

A: No. You should never share your password. If additional access is required, follow the procedure established to request access. Individuals who share their passwords are accountable for actions taken under the login.

Software licensing

All DePaul University software must either be licensed by DePaul or be considered “freeware” (public domain). If you wish to purchase software and are unsure if DePaul owns a license, call the Help Desk at (312) 362-8765. If the software is not licensed, the Help Desk can help you determine whether the software is freeware or if a license must be purchased.

- If the software is freeware, a faculty or staff member must contact the manufacturer/distributor for permission to install the software. (Permissions are still necessary even for freeware.)
- Or, the license agreement must state that the software is free for academic use.

For more information visit:

is.depaul.edu/computers/software/index.asp

policies.depaul.edu/policy/policy.aspx?pid=92

Q: I recently downloaded a pop-up blocker on my PC. Does this violate the university’s software licensing policy?

A: Your actions may violate the university’s policy. Many of the free pop-up blocker and anti-spyware downloads available on the Internet are intended for home or personal use only. Downloading this type of software in a commercial setting may violate the licensing agreement. Contact the DePaul Help Desk for assistance in determining if the software is properly licensed.

Adherence to copyright law

DePaul requires its faculty and staff to comply with applicable copyright laws. Permission must be obtained from the copyright owner to copy, distribute, transmit, download, publicly display, or make derivative works of materials for use that is not considered “fair use,” or where no legal review has been conducted.

The General Libraries assess fair use and clear copyright permissions related to library reserves (including electronic reserves). Faculty posting of copyrighted material on Blackboard and other course management systems is governed by the Copyright and Fair Use Policy.

For policy information, visit:

policies.depaul.edu/policy/policy.aspx?pid=263

DePaul also expects all users of its computer network to comply with applicable copyright laws. Upon notice of an alleged copyright infringement or actual knowledge of an infringement, DePaul will take all appropriate actions under the Digital Millennium Copyright Act (DMCA), which may include terminating an individual's access to the DePaul network.

For policy information, visit: policies.depaul.edu/policy/policy.aspx?pid=83, or call the Office of the General Counsel.

Reports of alleged copyright infringement occurring on DePaul Web pages should be directed to the university's designated DMCA agent at abuse@depaul.edu.

Q: I would like to download a journal article for use in my classroom. Is this a violation of U.S. Copyright laws?

A: DePaul has guidelines and resources to help determine whether such downloading would be permissible under applicable copyright laws.

Intellectual property

DePaul University, in accordance with its academic mission, places the highest value on the creation and dissemination of knowledge, and encourages its employees to develop and respect intellectual property. Intellectual property includes, but is not limited to, copyrightable materials, such as scholarly writings, course materials, films and musical works, and inventions such as computer programs, algorithms, scientific processes, and business methods.

For more information regarding the ownership of intellectual property developed by university employees, please see the [Discovery and](#)

[Copyright policy: policies.depaul.edu/policy/policy.aspx?pid=168](https://policies.depaul.edu/policy/policy.aspx?pid=168)

For more information regarding the appropriate use of intellectual property in the academic curriculum, please see the [Copyright and Fair Use policy: policies.depaul.edu/policy/policy.aspx?pid=263](https://policies.depaul.edu/policy/policy.aspx?pid=263)

Q: I am a DePaul employee and I have drafted a training manual for the university. Am I the copyright owner of this training manual?

A: Per the Discovery and Copyright policy, the answer depends on whether an employee is generally classified as faculty or as staff. In the absence of contractual provisions obligating the transfer of all or some proprietary rights in a discovery to a third party, faculty retain ownership of, and have the right to any income derived from, copyrighted material that they conceived or developed. However, copyrighted material in which a third-party contract exists that defines the disposition of copyrights, or in the case of faculty, resulted from a written work agreement, or work performed in accordance with the position of those defined as staff, are considered "obligated discoveries." Obligated discoveries are owned by the university and all of the rights to the copyrighted material must be assigned to the university in absence of a contract to the contrary.

Use of university facilities

DePaul has many state-of-the-art and unique spaces available for student, faculty and staff use for university-related business or activities. This includes presentations on academic, professional or administrative development, university business or publicity.

Any outside group that wishes to use DePaul's Student Center facilities must pay a fee. This includes programs that aren't meant for a DePaul audience, but are still reserved by a university department or member. Events that charge a registration fee or admission to an event must also pay for facility usage. Free use of space is intended to benefit the students, faculty and staff of DePaul.

For policy information visit:
policies.depaul.edu/policy/policy.aspx?pid=74

Most university facilities have their own reservation forms and policies. For a detailed contact guide, visit: offices.depaul.edu/student-centers/Pages/default.aspx

Q: Can I sponsor an off-campus organization that wants to use a DePaul facility for its meeting?

A: Yes. University departments can sponsor events held by off-campus organizations. The off-campus organization will need to pay a fee for use of DePaul spaces. The sponsoring department may be asked to provide its chart field information for billing purposes and a name of a staff member as a sponsor or contact. For questions regarding space availability or to make reservations, contact the Student Center's administration office.

CONFLICT OF INTEREST

Outside employment

While DePaul employees are allowed to seek additional work outside of the university, it should not interfere with the individual's time and performance at DePaul. If there appears to be a conflict or a performance problem as a result of outside employment, the employee may be counseled according to Human Resource's Progressive Discipline policy.

If a faculty member chooses to engage in outside work, the activities must be professional in nature and contribute to the development of the faculty member or provide expertise to the community. The time commitment for such work must not exceed the equivalent of one day per work week.

A college's or school's dean determines whether a faculty member's additional activities are within DePaul's guidelines on activities outside of the university. Teaching at another institution while under contract at DePaul is permitted only in instances where the dean has given written approval.

Q: Could I do occasional work for a family business while I'm employed at DePaul?

A: As long as the outside work does not interfere with or compromise your responsibilities associated with your position at DePaul, you may do outside work.

WORKPLACE CONDUCT

Managing a conflict

DePaul requires all employees whose independence of judgement may be impaired by a potential conflict of interest to either refrain from the conflict or disclose the conflict to a supervisor. In doing so, DePaul can help protect its interests, assets and resources. Examples of conflicts may include:

- approval decisions by an employee related to an outside vendor
- an employee with a financial or other personal interest in a company hired for a project

In these and other situations, a completed Certificate of Compliance with Conflict of Interest Policy form (Conflict of Interest form) is to be completed and approved by the direct supervisor of the employee.

For policy information, visit:
policies.depaul.edu/policy/policy.aspx?pid=23

For the Conflict of Interest Form, visit:
financialaffairs.depaul.edu/forms/index.htm

Q: My brother works for a printing company and we asked that his company do work for us. Is this a conflict?

A: You must disclose the relationship. In addition, for this and any other conflict of interest, or appearance of a conflict of interest, you must fill out a Conflict of Interest Form, then review it with your manager and submit it to the Controller's Office.

Fraud

DePaul will investigate any reported fraudulent activities or misuse of university resources or property. Any individual found to have engaged in fraudulent activities is subject to disciplinary action by the university, which may include termination and legal prosecution.

Definition: Fraud is a willful or deliberate act or failure to act with the intention of obtaining an unauthorized benefit. Such acts include:

- Forgery, making or altering documents or computer files with the intent to defraud
- Purposely inaccurate or fraudulent financial reporting
- Misappropriation or misuse of university resources such as funds, supplies or other assets
- Improper handling or reporting of monetary transactions
- Authorizing or receiving compensation for goods not received or services not performed
- Authorizing or receiving compensation for hours not worked

For more information, contact the Internal Audit Department.

Q: Should I confront an individual suspected of fraud or related misconduct?

A: No. University employees should not initiate investigations or questioning on their own. All suspected incidents of fraudulent or related misconduct should be reported to Internal Audit.

Duty to report discrimination, harassment, and sexual and relationship violence

Discrimination and harassment

DePaul has a long standing commitment to the diversity of its faculty, staff and student body. The university is committed to preserving an environment that respects the personal rights and dignity of each member of its community. DePaul's Anti-Discrimination and Anti-Harassment Policy and Procedures states that no person shall be the object of discrimination on the basis of race, color, ethnicity, religion, sex, gender, sexual orientation, national origin, age, marital status, parental status, family relationship status, physical or mental disability, military status, gender identity or genetic information, or any other status protected by local, state, or federal law in its employment or its educational settings.

The Office of Institutional Diversity and Equity is responsible for receiving, processing and resolving complaints of discrimination or harassment.

All members of the university who serve in a supervisory capacity, such as deans, managers and department chairs, are responsible for relaying all complaints of discrimination or harassment to the Office of Institutional Diversity and Equity. In addition, the

Office of Institutional Diversity and Equity encourages all individuals to relay complaints of discrimination or harassment.

DePaul prohibits retaliation and the threat of retaliation against any person exercising his or her rights in good faith under the Anti-Harassment and Discrimination Policy. Employees who engage in conduct that is prohibited by the Anti-Discrimination and Anti-Harassment Policy and Procedures, including retaliation, will be subject to disciplinary action, up to and including, termination.

For more information on discrimination and harassment visit:

<http://policies.depaul.edu/policy/policy.aspx?pid=299>

Q: My supervisor has recently made inappropriate cultural references that I find offensive. I am extremely uncomfortable with the situation, but fear that the fall-out from reporting it would be worse than putting up with the behavior. What can I do?

A: Report alleged incidents of discrimination to the Office of Institutional Diversity and Equity. The university prohibits retaliation or threat of retaliation in any form against employees who have filed discrimination complaints in good faith.

Sexual Harassment and Sexual and Relationship Violence

The learning and work environment should be free from inappropriate conduct of a sexual nature. Title IX is a federal law that prohibits discrimination on the basis of sex, including sexual

harassment and sexual and relationship violence, in federally funded education programs and activities. In accordance with DePaul's Catholic and Vincentian values and its role as an educational institution, sexual harassment is not tolerated in the learning environment or the work place. Similarly, the university condemns any form of sexual or relationship violence.

At DePaul, all employees, including student employees, are considered "responsible employees" and as such, must report any form of sex discrimination, including incidents of sexual harassment and sexual and relationship violence, to the university's Title IX coordinator. Additionally, individuals who have experienced sexual and relationship violence are strongly encouraged to report the incident to the Title IX coordinator in the Office of Institutional Diversity and Equity. Reports can be made directly at titleixcoordinator@depaul.edu or through other offices including Public Safety, the Office of Health Promotion and Wellness, or to a responsible employee.

The university prohibits retaliation against anyone for raising complaints under Title IX.

For more information on sexual and relationship violence prevention and response visit: <http://policies.depaul.edu/policy/policy.aspx?pid=320>

Q: During a recent school-sponsored social event held off campus after normal work hours, a colleague of mine made inappropriate statements to me of a sexual nature. My colleague's behavior made me very uncomfortable, but it occurred outside the workplace after normal work hours. What can I do?

A: Work-related events, such as business travel, or work-sponsored events, even if they are held off campus, are considered extensions of the workplace. You should report the incident to your manager or to the Title IX coordinator.

Q: As a responsible employee at DePaul, what information do I need to report to the Title IX coordinator if I learn of sex discrimination, including sex harassment or sexual or relationship violence?

A: You must disclose to the Title IX coordinator any information you know, including the name of the person reporting the sex discrimination, the name of the alleged perpetrator, the names of others involved, and any relevant facts that have been provided, such as date, time and location.

Family and Medical Leave Act (FMLA)

The Family and Medical Leave Act (FMLA) is a federal law that provides for leaves of absence for circumstances that require employees to be absent from work for extended periods of time due to the employee's serious health condition, the serious health condition

of an immediate family member (child, spouse, or parent), the birth of a child, or the placement of a child with an employee for adoption or foster care. Under the provisions of the FMLA, an eligible employee's position and benefits are protected for up to 12 weeks of unpaid leave in a rolling 12-month period.

An employee with a serious health condition, requiring an absence of more than three consecutive days, should contact Human Resources immediately. Details regarding eligibility criteria and employee rights and responsibilities can be found in the university's Family and Medical Leave Act policy. The university uses an external vendor for administration of FMLA benefits. Questions regarding FMLA should be directed to the Office of Human Resources.

For more information, visit:
policies.depaul.edu/policy/policy.aspx?pid=187

Q: I have been scheduled for a surgical procedure that will involve a recovery period of at least three weeks. How much notice do I need to provide my manager?

A: You should inform your manager of your plan to be absent as soon as possible. In addition, you will need to contact the Office of Human Resources to begin the application process.

Threats and violence

DePaul strives to maintain a work environment free from intimidation, threats (direct or implied) or violent acts. The university will not tolerate intimidating, threatening or hostile behavior of any kind. Employees who engage in conduct that is prohibited by the Threat Assessment and

Reporting Policy will be subject to disciplinary action, up to and including termination. As per the Threat Assessment and Reporting Policy, employees who believe they have been subject to threatening or violent behavior in the workplace, should report the incident to their supervisor, Public Safety or Human Resources.

For more information, visit:
policies.depaul.edu/policy/policy.aspx?pid=219

Q: A colleague in my office has developed a reputation for having a bad temper. Once at a meeting my colleague was so upset that he threw a stapler across the room in a rage. After a recent disagreement with him about a work-related issue he waited for me in the lot where I park my car and confronted me in an aggressive manner. He said that I was "not being fair" and that it made him "extremely angry." What should I do?

A: DePaul has a no tolerance policy against intimidating and hostile behavior of this kind. The incident should be reported to your manager and to the Public Safety Office or Human Resources. A prompt and thorough investigation of the incident will be conducted and appropriate action will be taken.

Overtime and timekeeping

Non-exempt employees are required to complete a time report to receive pay. Time reports are official records that must accurately reflect the time worked. Falsifying a time report is a serious act of misconduct that can lead to discipline up to and including termination.

DePaul complies with all applicable laws governing wage and hourly administration in the workplace.

In accordance with the Fair Labor Standards Act (FLSA), non-exempt employees will receive pay equal to one and one-half times the regular rate of pay for the hours they work in excess of 40 hours in a work week. Overtime is paid based on actual time worked, not time compensated. Time compensated is time not worked, such as vacation, sick or holiday pay. Supervisors of non-exempt employees must authorize overtime before it is worked.

Questions regarding overtime compensation should be directed to the Office of Human Resources.

financialaffairs.depaul.edu/payroll/index.htm

policies.depaul.edu/policy/policy.aspx?pid=203

policies.depaul.edu/policy/policy.aspx?pid=204

Q: My supervisor directed me to add five hours that I did not work to my time report as recognition for my contribution to an important project. Is that an acceptable form of recognition?

A: No. The time report is an official document that should reflect the actual hours worked by the employee. Falsification of a time report is a fraudulent act that is subject to discipline up to and including termination.

Employment of relatives

Relatives of DePaul employees do not receive preferential consideration for employment at the university. Relatives may work in the same department, though no individual should be directly supervised by a relative. Additionally, care should be given to avoid situations where relatives are responsible for checking or

verifying each other's work. Relatives are persons related by blood, marriage or legal procedure.

If a conflict occurs, attempts will be made to find a suitable position within the department or university where one of the employees may transfer. If no accommodations can be made, one of the employees may be asked to resign.

For more information, visit:

<https://policies.depaul.edu/policy/policy.aspx?pid=197>

Q: My new external grant includes funding for several part-time positions. As principal investigator and hiring manager, I plan to fill one of those positions by hiring my daughter. Does the university's Employment of Relatives policy apply to externally funded grant positions too?

A: Yes. The university's Employment of Relatives policy states that no individual shall be employed in a department or unit under the immediate supervision of a relative regardless of the source of funding.

Political activities and contacts with public officials

Political participation is a sensitive issue at DePaul that must be carefully understood and followed. The Higher Education Act of 1998 requires institutions that receive federal aid to promote voter registration. A "good faith effort" should be made to distribute voter registration forms to all enrolled students.

DePaul is also subject to many political limitations due to its non-profit, tax-exempt status. For example, the university or anyone on behalf of the university cannot endorse or fund any

political activity or individuals running for public office, whether at the local, state or federal level. Doing so could jeopardize DePaul's tax-exempt status.

Employees are encouraged to participate in the election process as long as it is not during the hours they work for the university. However, DePaul employees are prohibited from speaking or acting on behalf of the university when involved in political activities. Also prohibited is the use of DePaul letterhead, university lists, phones or office space to support a specific political candidate.

When a university-related activity requires contact with a political official, whether from the City of Chicago, or on state or federal levels, it should first be cleared through the Office of Community and Government Relations.

For policy information, visit:
policies.depaul.edu/policy/policy.aspx?pid=117
policies.depaul.edu/policy/policy.aspx?pid=121

Q: As I was walking to a building on campus, I noticed a sign with a political candidate's name on it in an office window of a DePaul employee. Is this against university policy?

A: Yes. The sign could be construed as an endorsement of the candidate named on the sign by the university. DePaul's status as a tax-exempt organization places limits on the types of allowable political activities. In this instance, the endorsement concern can be alleviated by positioning the sign so it is only visible from the inside of the office.

Environmental health and safety

DePaul takes the safety and well-being of the entire university community very seriously. By law, DePaul is required to follow the Occupational Safety and Health Administration's (OSHA) and the Environmental Protection Agency's (EPA) regulations, other local and state environmental/safety codes, regulations and ordinances, and the internal policies of the university. This applies to chemical inventory and storage, compilation of Safety Data Sheets (SDSs), disposal of hazardous waste, training for employees and students, and provision of "right-to-know" information.

Environmental, health and safety information pertaining to DePaul University can be found at rmehs.depaul.edu. Hard copies are also available from The Office of Environmental Health and Safety.

For policy information, visit:
policies.depaul.edu/policy/policy.aspx?pid=60

To view safety manuals and procedures, go to the EHS website.

Q: It is unclear to me what I should do in

the event of a fire or other emergency that requires evacuating my building. Where do I go to get this information?

A: Your manager can provide you with the evacuation procedures for your work area. It is important to address the following areas: the type of alarm or announcement, location of emergency exits, how to request assistance in exiting the building, and the assembly point for your work group after you have exited the building.

Specific information regarding the university's evacuation procedures can be found at:
publicsafety.depaul.edu/links/index.asp

Duty to report crime and accidents The university's procedures and practices for reporting crime and other suspected misconduct promote good business practice and comply with various laws.

The university, through its Public Safety Office and in concurrence with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act, reports all serious crimes on campus to the proper municipal authority and provides statistics on these crimes in its Annual Safety and Security Information Report and Fire Safety Report. Employees who witness a crime being committed on or around DePaul's campuses should report the information to DePaul Public Safety. Employees who are Campus Security Authorities (CSAs) under the Clery Act must report all crimes reported to them to Public Safety as soon as possible. CSAs are university faculty and staff members with "significant responsibility" for student and campus activities. Crimes that occur off-campus involving DePaul students or at DePaul sponsored events should also be reported to local municipal authorities and Public Safety. Employees who report an incident to Public Safety may also be required to report the matter to DCFS pursuant to their obligations as a mandated reporter of child abuse and neglect.

The Illinois Abused and Neglected Child Reporting Act (325 ILCS 5) mandates that all university personnel who have reasonable cause to believe that a child

under the age of 18 known to them in their professional or official capacity may have been subjected to physical or sexual abuse, may be at risk of physical or sexual abuse, or is being deprived of the proper or necessary care immediately report such mistreatment to the Illinois Department of Children and Family Services ("DCFS") by calling the DCFS child abuse hotline at 1-800-25-ABUSE (1-800-252-2873). Mandated reporters are individually responsible for ensuring that certain conduct is reported directly to DCFS and reporting this conduct to DePaul Public Safety, a supervisor or administrator will not fulfill this legal obligation. Employees who report an incident to DCFS may also be required to report the matter to Public Safety pursuant to DePaul's crime reporting guidelines.

Reporting an accident is just as important as reporting a crime. If an accident occurs on university property, the Public Safety Department should be notified so that an accident report will be issued. If the accident results in an injury to a DePaul employee, the Office of Risk Management should be contacted. If an injury occurs to another person or damages another person's property, contact the Office of Risk Management.

For policy information, visit:
policies.depaul.edu/policy/policy.aspx?pid=54
policies.depaul.edu/policy/policy.aspx?pid=105

Q: I think I've been the victim of theft, what should I do?

A: If the crime happens on or to university property, contact the Public Safety Department and make sure that a Security Report is issued. Then notify the Office of Risk Management if an insurance claim needs to be filed. A copy of the Security Report is needed to support the insurance claim. DePaul does not provide insurance coverage for employee or student personal property. If loss of personal property occurs, an employee or student should consult their homeowner's or renter's insurance policy.

DRUG-FREE WORKPLACE AND LEGAL DRINKING AGE COMPLIANCE

As an institution receiving federal financial assistance, DePaul University complies with the Drug Free Workplace Act and the Drug Free Schools and Communities Act. The State of Illinois prohibits the sale, use, or possession, of alcoholic beverages by persons who are under 21 years of age. Alcohol may be served to those of legal age at university events, including classes. Event sponsors are responsible for having adequate control measures in place to ensure that persons under 21 years of age and persons who are obviously intoxicated are not served alcohol.

Q: Our academic department is hosting an event and plans to have food and alcoholic beverages available to guests. Can undergraduate students enrolled in the program be included on the list of invitees?

A: Undergraduate students may be invited to the event. However, the event sponsor is responsible for ensuring alcoholic beverages are not served to persons under 21 years of age. Proper controls may include hiring a professional bartender to serve alcohol, on-site security, the presence of a university representative, a method of age identification, and monitoring of the event.

For policy details, go to: policies.depaul.edu/policy/policy.aspx?pid=259

FINANCIAL MANAGEMENT

Travel and entertainment

The university will reimburse employees and university guests performing services for the benefit of the university for reasonable business expenses incurred while conducting authorized university business. Employees are encouraged to use their university Pro Card for expenses in lieu of incurring out-of-pocket expenses. When not using a Pro Card, employees are expected to pay expenses out-of-pocket.

All reimbursement requests must be substantiated by documentation of a clearly stated business purpose, the amount of each separate expenditure, the date of the

expenditure, and the location of the expenditure. An original receipt is required for all transactions, except meals of \$25 and under.

Reimbursement for local travel, generally considered travel that does not require overnight lodging, normally includes trips to non-routine destinations for business purposes that are not part of the normal and usual position requirements. Local travel does not include normal commuting costs. DePaul does not reimburse for normal commuting costs.

For policy information, visit: policies.depaul.edu/policy/policy.aspx?pid=103

Q: I had to go to a suburban campus for a meeting. Is my mileage or travel expense reimbursable?

A: Yes. As long as the expenses are not part of your daily travel or commuting costs, travel expenses are reimbursable when visiting other campuses for business-related functions.

Gifts from the university

In general, university funds are not to be used to purchase a gift for an employee or group of employees. Any such gifts must be purchased with personal funds or the department may take up voluntary collections for such purchases. Please note that the university must report and tax, as compensation, all non-de minimus non-cash gifts it provides to employees. Refer to the Gifts to Employees policy for additional information.

As an exception, with the approval of the appropriate Dean or Vice

President, a unit/department may provide a modest length of service/retirement gift to an employee in recognition of their years of service to the university.

In addition, with the approval of the appropriate Dean or Vice President, a unit/department may send flowers upon the death of an employee, or an immediate family member of an employee.

For policy information, visit: policies.depaul.edu/policy/policy.aspx?pid=44

Q: A close family member of an employee just passed away. Can my department purchase a flower arrangement for the funeral?

A: With the approval of the appropriate Dean or Vice President, a unit/department may send flowers upon the death of an employee or an immediate family member of an employee. Normally, the cost of the flowers should not exceed \$150.00. For memorial donations to outside organizations, see the Gifts or Donations from the University policy.

Gift Acceptance and Processing

All private donations (gifts) received by any area of the university must be sent to the Office of Advancement for processing within one working day of receipt of the donation, to ensure the donor receives legal credit and proper acknowledgement.

If a donor has expressed an intent to give a gift of real or personal property, securities, a planned gift, or a gift of \$250 or more, the Office of Advancement must be contacted. Advancement will coordinate an

internal review to determine if the university can accept the gift and to arrange for proper transmission of any accepted gifts to the university.

Q: Our area would like to solicit private, charitable donations in order to help financially support our activities. Do we need to obtain university approval?

A: Yes. You must obtain approval to solicit private, charitable donations that benefit your program from the Office of Advancement. You should obtain approval from the Advancement gift officer that works with your area, and you must adhere to all existing university solicitation clearance procedures. Furthermore, if you want to conduct a fundraising event, you must obtain additional clearance from the Vice President of Development via the fundraising event clearance form. The fundraising event clearance form is available at alumni.depaul.edu/give/Forms/FundraisingEvent.aspx. All donations you receive must be delivered to Advancement Gift Processing to ensure that donors receive legal credit and proper acknowledgement.

To view the Gift Acceptance and Processing policy go to: policies.depaul.edu/policy/policy.aspx?pid=229

Proper use of consultants

It is expected that university activities will be carried out to the maximum extent possible by utilizing the services of regular employees. When services required cannot be provided adequately by regular employees within the scope of their university employment, consultants

or independent contractors may be utilized. The university is responsible for analyzing each pay for services situation to determine whether the work performed should be treated as dependent (employee) or independent (external consultant/vendor) based on Internal Revenue Service (IRS) guidelines. The Use of Independent Contractors/Consultants policy provides guidelines to determine dependent versus independent status.

When consultants or independent contractors are necessary, the Manager of Accounts Payable or the Tax Manager should be contacted for aid in determining if the service provider should be paid as an employee or as an independent contractor (external consultant/vendor) based on Internal Revenue Service (IRS) guidelines.

For policy information, visit: policies.depaul.edu/policy/policy.aspx?pid=94

policies.depaul.edu/policy/policy.aspx?pid=81

Q: If a current DePaul employee is providing services to another department independent of her position, should she be paid as an employee or as a consultant?

A: This employee must be paid as an employee and her payment arrangements must be made according to university policies and procedures. If the employee is paid hourly, there may be overtime implications. To ensure compliance with overtime laws, contact Human Resources regarding compensation.

Trademarks, fair trade and licensing

DePaul owns and controls several names and logos associated with the university, such as the Tree of Wisdom, the DePaul signature, Coat of Arms, the Seal, and the Blue Demons athletic logo. Any variation or modification to a DePaul trademarked symbol or logo is illegal, regardless of its intended use.

To ensure compliance with university policies and brand standards, contact the Department of University Marketing Communications prior to using the Tree of Wisdom or the DePaul signature on printed materials or electronic media. Contact the Director of Sports Marketing and Licensing for permission prior to using the Blue Demons Athletic logo on any material. The trademark or copyright symbol (™ or ®) must be used next to DePaul logos on any item that could be sold, regardless of whether you intend to sell it.

DePaul conducts its business in a socially responsible manner that supports the ideals of its namesake, St. Vincent de Paul, and his strong beliefs in social justice. The university has a Fair Business Practice Committee that reviews labor conditions found in factories of DePaul licensees, and recommends minimum standards with which licensees are required to comply. The university expects its licensees to adopt business practices that are compatible with these standards.

For policy information, visit: policies.depaul.edu/policy/policy.aspx?pid=118

Q: I am ordering a novelty item for my department event on which I would like to use a DePaul logo. Who should I contact? Do I need to use the trademark symbol?

A: Contact the Director of Sports Marketing and Licensing in Athletics to discuss the use of a DePaul logo for your project. The Director will advise you on whether and how to use any DePaul mark and also discuss your next steps for proceeding with the order. You must use the trademark symbol, even though you plan to give the items away.

FINANCIAL AID CODE OF CONDUCT

Background

DePaul University participates in the Federal Direct Loan Program and receives Title IV federal loans for its students. As a condition of this participation and to comply with the Higher Education Opportunity Act of 2008 (“HEOA”), DePaul has instituted this Financial Aid Code of Conduct (“Code”) to ensure the integrity and compliance of its administration of student loan programs. Though DePaul as a direct lender may not be subject to every circumstance detailed below, the University nonetheless prefers to take an expansive approach to combat any actual or appearance of a conflict of interest with respect to student loans.

Procedures

All DePaul University officers, employees, and agents with responsibilities for financial aid or student loans must comply with this Code. Such officers, employees, and agents must be initially trained on the Code’s requirements. Thereafter, such officers, employees, and agents shall be annually informed of its provisions and shall annually certify in writing their understanding and acceptance of this Code. This Code will

also be attached to the University's Code of Conduct maintained by Compliance and Risk Management.

The Financial Aid Code of Conduct is based upon Section 493 of the HEOA and shall be interpreted consistently with its provisions and any regulations promulgated there under. The determination of whether conduct of a DePaul officer, employee, or agent falls within this Code shall be made by the Office of Financial Aid, in consultation with the Office of the General Counsel. All questions regarding this Code should be directed to the Director of Financial Aid Compliance at (312) 362-8348.

If there is uncertainty as to whether conduct falls within the restrictions of this Code, officers, employees, and agents must consult with the Director of Financial Aid Compliance in advance of proceeding with the conduct. Officers, employees, and agents subject to this Code who receive any of the "gift" exceptions identified in paragraph two must also report them in writing to the Director of Financial Aid Compliance.

Provisions

1. Ban on Revenue Sharing

DePaul University shall not enter into any revenue-sharing arrangements with any lender. This includes any arrangement between DePaul and a lender that results in the lender paying a fee or other benefits (such as a share of the profits) to DePaul, its officers, employees or agents, as a result of the University recommending the lender to students or their families.

2. Ban on Gifts

DePaul has a Gifts to Employees Policy ("Gifts Policy") that outlines guidelines and restrictions associated with the

acceptance of gifts offered by third parties to University employees and business units. In addition to the Gifts Policy, DePaul officers, employees, and agents employed by the Office of Financial Aid or otherwise responsible for education loans will also be bound by the following gift restrictions:

No DePaul officer, employee, or agent employed by the Financial Aid office or otherwise responsible for education loans shall solicit or accept any gift from a lender, guarantor, or servicer of education loans. This ban even applies to gifts whose value falls below the limits of DePaul's Gifts Policy. For the purposes of this Code, the term "gifts" includes but is not limited to any cash, gratuity, favor, discount, entertainment, hospitality, loan, or other item having a monetary value of more than a de minimus amount. The term as used herein includes a gift of services, transportation, lodging, or meals, whether provided or paid for directly or reimbursed after the expense has been incurred.

For the purposes of this Code, the term "gifts" shall not include any of the items below. **However, officers, employees, and agents subject to this Code must report receipt of any of the following in writing to the Director of Financial Aid Compliance:**

- Standard material, activities, or programs on issues related to loans or financial information, such as a brochure, a workshop, or training;
- Food, refreshments, training, or informational material furnished to an officer, employee, or agent of DePaul as an integral part of a training session that is designed to improve the service of a

lender, guarantor, or servicer of education loans to the institution, if such training contributes to the professional development of the officer, employee, or agent;

- Favorable terms, conditions, and borrower benefits on an education loan provided to a student employed by DePaul, if such terms, conditions, or benefits are comparable to those provided to all DePaul students;
- Entrance and exit counseling services provided to borrowers to meet DePaul's responsibilities for entrance and exit counseling as required by the HEOA, so long as DePaul's staff controls the counseling and it does not promote the products or services of any specific lender;
- Philanthropic contributions to DePaul from a lender, servicer, or guarantor of educational loans that are unrelated to educational loans or any contribution from any lender, guarantor, or servicer that is not made in exchange for any advantage related to education loans; or
- State education grants, scholarships, or financial aid funds administered by or on behalf of a state.

A gift from a lender, guarantor, or servicer of education loans to a family member or other acquaintance of an individual subject to this code is prohibited if (1) given with the individual's knowledge and acquiescence, (2) with reason to believe it was given because of his or her official University position. For additional restrictions on gifts, please refer to DePaul's Gifts Policy.

3. Ban on Contracting Arrangements

No DePaul officer, employee, or agent employed in the Office of Financial Aid or otherwise responsible for education loans shall accept from any lender or its affiliate any fee, payment or other financial benefit (including the opportunity to purchase stock) as compensation for any type of consulting arrangement or other contract to provide services to or on behalf of a lender, guarantor, or servicer of education loans.

4. Ban on Certain Interactions with Borrowers

For any first time borrower, DePaul shall not assign the borrower's loan to a particular lender or refuse to certify, or delay certification of, any loan based on the borrower's selection of a particular lender or guaranty agency.

5. Ban on Offers of Funds for Private Loans

DePaul shall not request or accept from any lender any offer of funds to be used for private education loans, including an opportunity pool loan, to students in exchange for the institution providing concessions or promises regarding providing the lender with a specified number of loans or loan volume, or a preferred lender arrangement for such loans.

6. Ban on Staffing Assistance

DePaul shall not request or accept from any lender any assistance with call center staffing or Office of Financial Aid staffing. However, this Code shall not be construed to prohibit DePaul from requesting or accepting assistance from a lender related to professional development training, financial counseling materials (provided they disclose the identity of any lender

that assisted in their preparation), or short-term, non-recurring staffing during local, state, or federal emergencies.

7. Ban on Advisory Board

Compensation

No DePaul officer, employee, or agent employed in the Financial Aid office or otherwise responsible for education loans, who serves on an advisory board, commission, or group established by lenders or guarantors, shall receive anything of value from the lenders or guarantors except for reimbursement of reasonable expenses incurred in serving on such board, commission, or group.

8. Ban on Other Conflicts of Interest

DePaul has a Conflicts of Interest Policy which requires University employees to either refrain from or disclose their involvement in matters where any conflict or appearance of conflict between personal and University interests exists. In addition to this Conflicts of Interest Policy, all DePaul officers, employees, and agents employed in the Office of Financial Aid or otherwise responsible for education loans are prohibited from having any conflicts of interest with respect to their responsibilities for Title IV education loans.

In addition to the items above, as a member of the National Association of Student Financial Aid Administrators (NASFAA), DePaul also follows the standards established in NASFAA's Statement of Ethical Principles and Code of Conduct for Institutional Financial Aid Professionals. See nasfaa.org/mkt/about/Statement_of_Ethical_Principles.aspx.

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