Code of Conduct for Senior Financial Managers

This code outlines the expectations or standards of conduct for St. Lawrence University employees with significant responsibilities related to the financial assets, performance and the books and records of the university. Senior Financial Managers include the President, all vice presidents and many management staff. Each of these managers shall acknowledge receipt and understanding of this policy and complete the Conflict of Interest Statement. These employees will:

- Conduct themselves in an honest and ethical manner, including the ethical handling of actual or apparent conflict of interest between personal and professional relationships. Each senior financial manager will execute a Conflict of Interest Statement and update it annually.
- Strive for full, accurate, timely and understandable disclosure in reporting and recording transactions in the University’s books and records in accordance with the University’s accounting policies and practices.
- Ensure, to the best of their ability, that their work and actions comply with applicable government laws, rules and regulations.
- Proactively promote ethical behavior among subordinates and peers and encourage employees to act responsibly, with due care, without misrepresenting or omitting material facts or allowing independent judgment to be compromised.
- Promptly report violations of this code to their respective Vice President, the President of the University or the Chair of the University’s Audit Committee of the Board of Trustees or through Ethics Point. Confidentiality of individuals reporting violations of these standards will be maintained whenever possible. Retaliation against individuals reporting a violation or a potential violation of this policy will not be tolerated.

Code of Conduct for Senior Financial Managers

I ____________________________ acknowledge receipt and understanding of the Code of Conduct for Senior Financial Managers.

______________________________  __________
Signature                      Date
CONFLICT OF INTEREST STATEMENT

(Print Name)

1. To your knowledge, are you an officer or director of any private sector (profit or non-profit) organization with which St. Lawrence University has business dealings?

Yes ______ No _______

If the answer to the foregoing question is “yes,” please list the names of such corporations, the office held, and the approximate dollar amount of business involved with St. Lawrence University during the preceding calendar year.

________________________________________________________________________

________________________________________________________________________

________________________________________________________________________

2. To your knowledge, do you, or does any member of your family, (defined as yourself, your spouse, minor children or other person living in your household) have a significant financial interest in, or receive any remuneration or significant income from, any private sector (profit or non-profit) organization with which St. Lawrence University has business dealings?

Yes ______ No _______

If the answer to the foregoing question is “yes,” please list the business organization in which such interest is held and the person(s) by whom such interest is held

________________________________________________________________________

________________________________________________________________________

________________________________________________________________________

Nature and amount of each such financial interest, remuneration, or income:

________________________________________________________________________

________________________________________________________________________

________________________________________________________________________
3. To your knowledge, did you, or any member of your family, (defined as yourself, your spouse, minor children or other person living in your household) receive during the preceding calendar year, any gifts or loans from any private sector (profit or non-profit) organization with which St. Lawrence University has significant business dealings?

Yes ______ No ________

If the answer to the foregoing question is “yes,” list such gifts or loans as follows:

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<tr>
<th>Name of Source</th>
<th>Item</th>
<th>Approximate Value</th>
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I affirm that, to the best of my knowledge, the foregoing information is true and complete.

______________________________      _________
Signature                    Date

CC: Personnel File

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**Conflicts of Interest**

An employee shall be considered to have a conflict of interest if such employee, or any member of his or her family, (defined as the employee, employee’s spouse, minor children or other person living in the household) has existing or potential financial or other interests which might impair, or reasonably appear to impair, the employee’s independent, unbiased judgment in discharge of his or her responsibilities to the University. All employees shall disclose to their division Vice President any possible conflict of interest at the earliest practicable time. No employee shall play a role in any decision in which such employee has a conflict of interest.

*Updated October 2011*