

Yale University's Standards of Business Conduct

The University's mission of advancing knowledge and educating citizens requires all members of the Yale community to share a commitment to excellence. The excellence we prize in our work can be sustained, however, only if our actions as members of the Yale community are beyond ethical reproach. The success and reputation of the University in fulfilling its core mission depend on the integrity with which each community member — whether dean or faculty member, business manager or other staff — participates in our joint endeavor. Accordingly, each member of Yale University is expected to adhere to the University's Standards of Business Conduct in dealings inside and outside of the University.

These Standards express the principles that have long governed the business dealings of all members of the Yale community. They are designed to serve as a useful distillation of well-established precepts and to re-emphasize the importance of adhering to them in all business dealings. These Standards are reflected in many separate policies and procedures of the University, whose definitive statements appear elsewhere — for example, in the Faculty Handbook, and the Personnel Policies and Practices Manual, both available on the University website. Web addresses for related policies are linked to the standard and provided in this brochure. Questions about the applicability of the Standards or the referenced policies in particular circumstances may be addressed to the Yale Assistant Vice President and Controller, at 432.5524, or to the Deputy General Counsel, at 432.4949.

Your confidential channel to report any concerns is the Yale University Hotline: 1.877.360.YALE.

Yale University Offices

877.360.YALE	Yale University Hotline
432.4949	Office of the Vice President & General Counsel
436.0497	University Auditing
432.1335	Office of the Chief Financial Officer
432.5524	Controller's Office
785.3550	Environmental Health & Safety
432.6754	Facilities Operations, Construction and Renovation
436.3650	FAS Human Subjects Committee
432.0108	Office of Research Administration
432.3060	Grant & Contract Financial Administration
	Grant & Contract Administration
785.4692	Medicine
432.2460	Central
432.5775	Human Resources
432.6500	Information Technology Services
785.5992	Institutional Animal Care & Use Committee
800.351.2831	Medical Billing Hotline
432.0849	Office for Equal Opportunity Programs
432.4444	Provost's Office
432.4400	University Police
436.3650	University Privacy Officer
785.3868	Yale Medical Group—Compliance Office
785.2436	YSM Finance & Administration
785.4688	YSM Human Investigation Committee
737.2420	YSN Human Subjects Research Review Committee
785.3200	YSM Information Technology Services
737.4100	YSM Ombudsperson



Yale University



Standards of Business Conduct



1 Ethical conduct

Yale faculty and staff should conduct themselves ethically, honestly, and with integrity in all dealings. They need to be fair and principled in their business interactions and to act in good faith in these matters with others both inside and outside the community. They should act with due recognition of their position of trust and loyalty with respect to the University and its students, research sponsors, and donors. When in doubt about the propriety of a proposed course of action, they should seek counsel from those colleagues, supervisors, or administrators who can assist in determining the right and appropriate course. (Guiding Principles for Business and Financial Administration, Policy 1101, <http://www.yale.edu/ppdev/policy/1101/1101.pdf>; Policies and Procedures for Dealing with Allegations of Academic Fraud, http://www.yale.edu/grants/policies_reg/acadfraud.html.)

2 Respect for others

The Yale community is diverse — in race, background, age, religion, and in many other ways. The personal actions of each community member establish and maintain the culture of tolerance and respect for which we strive. While principles of free speech remain paramount at Yale, faculty and staff should respect the rights and dignity of others regardless of their differences, and must conscientiously abide by the principles of nondiscrimination adopted by the University. Harassment along sexual, racial, or political lines has no place in our community. (University Equal Opportunity Statement & Statement on Sexual Harassment, <http://www.yale.edu/equalopportunity/policies/index.html>; Information Technology Appropriate Use Policy, <http://www.yale.edu/policy/itaup.html>.)

3 Conflicts of interest

As is more fully stated in the Yale Policy on Conflict of Interest and Conflict of Commitment, Yale faculty and staff must avoid improper conflicts of interest in conducting their work at the University. Financial conflicts of interest must be disclosed, reviewed, and appropriately managed or eliminated. Faculty and staff should demonstrate sensitivity in identifying potential conflicts of interest, whether of a financial, personal, or professional nature, and must follow the reporting and other provisions of applicable University policies. (University Policy on Conflict of Interest and Conflict of Commitment, <http://www.yale.edu/provost/html/coi.html>; Faculty Handbook, <http://www.yale.edu/provost/handbook/yfhtoc.html>; Personnel Policies and Practices Manual, Policy 505, <http://www.yale.edu/ppdev/PersPracWeb/505.html>.)

4 Compliance with applicable laws and regulations

The University is in a heavily regulated environment. Compliance with laws is important as a matter of principle. Faculty and staff should also recognize that noncompliance can have severe adverse financial and other consequences, potentially affecting the reputation and operations of the entire University. Yale faculty and staff must comply rigorously with federal, state, and local laws and regulations that apply to the performance of their responsibilities at the University. All have a duty to inform themselves, through University sources and independently, about relevant legal obligations and to keep current with changes in applicable law. When in doubt about the interpretation of applicable law, they should seek advice from the Office of the Vice President and General Counsel.

5 Compliance with applicable University policies and procedures

The University has established policies and procedures for managing its business and other operations. Some are required by law; some are prudential; and some are managerial, designed to ensure smooth and coordinated business operations. Yale faculty and staff are expected to inform themselves about and comply with applicable University policies and procedures. (See Policy compilations and links at, e.g., <http://www.yale.edu/ppdev/>; <http://www.yale.edu/ocr/pfg/policies/index.html> (Cooperative Research, for intellectual property policies); www.yale.edu/grants/policies_reg/index.html and <http://info.med.yale.edu/ysm/grants/policies/> (Grant and Contract Administration); <http://www.yale.edu/provost/html/policies.html> (Provost's Office, for Faculty Handbook and other policy statements).

6 Compliance with contractual, grant, and other private obligations

In the course of its operations, the University frequently undertakes contractual and other formal obligations to outside entities. These obligations are embodied, for example, in commercial contracts for the purchase of goods or services, software licenses, gift indentures, and memoranda of understanding with other organizations. Yale faculty and staff are expected to adhere closely and act in good faith with regard to all applicable private obligations assumed by the University.

7 Individual responsibility and accountability

Yale faculty and staff should assume and exercise responsibility appropriate to their positions and roles. They are accountable to each other, to the University, and to themselves for their actions and their decisions not to act.

When roles or responsibilities are unclear, they should take it upon themselves to obtain clarity. They should exercise sound business judgment in the performance of their responsibilities, to the best of their ability.

8 Stewardship of property and funds

As stewards of University property and funds with a responsibility to contributors to the University, including federal, state, and local governments, Yale faculty and staff should treat University property with care, as if it were their own property, and must expend funds prudently. They should avoid waste and improper use, and should not use University funds, property, or facilities for their personal benefit or for the benefit of a non-University organization without proper approval. Their acts should reflect the recognition of a special obligation to use University property responsibly and consistent with the tax-exempt status conferred on the University in light of its educational, research, and clinical mission.

9 Appropriate treatment of confidential information

In their various capacities, Yale faculty and staff become privy to confidential information of many different types. Such information may concern students, patients, employees, or research sponsors, for example, or it may be proprietary information of an enterprise licensing Yale intellectual property or otherwise subject to contractual or legislated obligations of confidentiality. Yale faculty and staff are expected to inform themselves about applicable obligations and to maintain the confidentiality of such information, safeguarding it and using it only as any applicable restrictions permit. (See HIPAA, <http://info.med.yale.edu/hipaa/>)

10 Recording, allocating, and charging costs and effort

The accuracy and reliability of financial and effort reports is of paramount importance to the business operations of the University. At all times, Yale faculty and staff must record, allocate, and charge costs and effort accurately and maintain supporting documentation as required by established policies and procedures.

11 Internal controls

Internal controls provide the keystone of sound business practices. These controls include adequate segregation of duties, diligent application of preventive and detective control systems, and conscientious compliance with authorization, reporting, and other established processes. Internal controls are critical to ensuring efficient operations, responsible financial management, accurate financial reporting, careful protection of assets, and satisfactory

compliance with applicable laws and regulations. Faculty and staff are expected to maintain and support internal controls structures at the University.

12 Gifts, gratuities, and “kickbacks”

Relationships between Yale and its vendors must be free of any taint. Yale faculty and staff should not personally accept any material gift, gratuity, or other payment, in cash or in kind, from any vendor seeking to do business with Yale or currently doing business with Yale. If questions arise about the materiality of a proposed gift or gratuity, the proposed recipient should seek advice from the Office of the Vice President and General Counsel. (See Policy 2201, Gifts from External Parties to Employees, <http://www.yale.edu/ppdev/policy/2201/2201.pdf> Regarding student lending relationships, see Yale Student Lending Code of Conduct and Connecticut State Financial Aid Code of Conduct, <http://www.yale.edu/sfas/finaid/student-loan-info>)

13 Antitrust

Yale faculty and staff may not improperly collude with other entities in matters affecting financial decisions of the University. The University's standards in this regard can be found in the Yale University Antitrust Compliance Guidelines at http://www.yale.edu/provost/Yale_Antitrust_Compliance.pdf.

14 Obligation to report suspected material violations

Yale faculty and staff are strongly encouraged to report suspected material violations of these Standards, of laws and regulations, or related University policies and procedures, both to the Director of University Auditing and to a supervisor, Dean, the Controller, or the Office of the Vice President and General Counsel, depending upon the nature of the violation. Individuals charged with supervising others at the University should do so actively, making sure that supervisees have received adequate training with respect to their obligations and are meeting their obligations under these Standards. Supervisors are expected to take appropriate disciplinary action to address noncompliance. An employee shall not be disciplined or otherwise penalized for reporting, in good faith, an allegation that these Standards have been violated. (See: Institutional Resources for Guidance on the Standards of Business Conduct, <http://www.yale.edu/resources/pyramid.html>.)

15 Consequences of violation

Violations of these Standards, of laws and regulations, or of related University policies and procedures may carry disciplinary consequences, up to and including dismissal.