

**SECTION:** Asbury College/Institutional  
**SUBJECT:** Conflict of Interest

**ISSUED BY:** President's Cabinet  
**REPLACES:** New  
**APPROVED BY:** President's Cabinet  
**EFFECTIVE DATE:** April 2005

### Policy

Asbury College, as a ministry initiated and sustained by God, has a mandate to conduct all of its affairs decently and above reproach both in the sight of God and man. That accountability included commitment to operate with the highest level of integrity and to avoid conflicts of interest. Potential conflicts of interest can arise in a variety of ways and can involve board members, officers, administrators or other employees. Therefore, it is very important that all employees be aware that potential or apparent conflicts of interest may arise from involvement in any of the following activities:

- Conducting business for oneself or another organization during normal work hours during which the individual's work performance is negatively impacted and/or for which organization resources, such as supplies or equipment, are used without permission;
- Accepting gifts or anything that could be constructed as a "kick-back" from third parties that do business or want to do business with the organization;
- Receiving honorariums or royalties for products or services delivered by Asbury College or its agents or employees;
- Solicitation of donors and others for support of the institution;
- Holding any interest, including owning stock or holding debt, in any third party that does business or wants to do business with the organization;
- Serving in any positions of leadership, such as board member or trustee, in any third party that does business or wants to do business with the organization;
- Holding any interest in any asset, such as real estate or equipment, which the organization wants to acquire or use.

It is important to note that involvement in the above listed activities does not immediately constitute a conflict of interest. It is the responsibility of employees to report their involvement in such activities to their immediate supervisor or executive officer to discuss any potential or apparent conflicts of interest that may arise.

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Because of the potential for conflicts of interest in these activities the college specifically prohibits certain activities of its employees as follows:

- The use of official position and influence by persons who are in a position to make or substantially influence a decision on behalf of the college from which they or an immediate family member may derive personal benefit.
- Acceptance of other employment, contract for services or other arrangements for remuneration that may impinge on College obligations. This prohibition includes serving as an adviser or consultant to any such organization, unless that activity is conducted as a representative of Asbury College. This is intended to include the use of donor information and relationships to further the position of another organization. Honorariums received for speaking engagements in which the speaker is serving as a representative of Asbury College shall also be returned as gifts to the College.
- Receiving personal gifts or loans from third parties dealing with the organization or an affiliate. Receipt of any gift is disapproved except gifts of nominal value (less than \$50) which could not be refused without discourtesy. No personal gift of money should ever be accepted. The meaning of gifts for purposes of this policy includes the acceptance of lavish entertainment and free long-distance travel and lodging.
- Employees are not to give, offer, or promise, directly or indirectly, anything of value to any donor, potential donor, or institution in direct connection with a particular transaction or business that Asbury may have with such individuals.
- Employees must disclose to their supervisor or Executive Officer any interest they or their immediate family have in any firm which does business with Asbury College or which competes with Asbury College. Asbury College may require divestiture of such interest if it deems the interest to be in conflict with its best interests.

It is the policy of Asbury College to prohibit its employees from engaging in any activity, practice or act which conflicts with, or appears to conflict with, the interest of the Asbury College. At no time shall an employee of the College advance in their professional relationships a personal agenda superior to the work of the institution.

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