

YESHIVA UNIVERSITY

CODE OF CONDUCT

Introduction

This Code of Conduct applies to all employees, faculty and staff of Yeshiva University and its related entities and affiliated schools (the “*University*”), as well as all consultants, vendors and contractors providing services to the University and individuals who perform services for the University as volunteers. The Code refers to all these persons collectively as “*members of the University community.*”

The Code is the foundation of the University’s Ethics and Compliance Program, which is intended to assist the members of the University community in conducting their activities ethically, honestly and legally. As a non-profit institution, the University recognizes that it is essential for all members of the University community to maintain the highest ethical standards of conduct and integrity. The Code, together with the University’s Employee Handbook, Faculty Handbook and other policies and procedures, as the same may be modified or supplemented from time to time, describes the behavior expected of all members of the University community. The Code is not intended to cover every situation that might arise but is intended to help members of the University community make the right decision or ask the right questions.

It is the responsibility of all members of the University community to know, understand, and comply with the Code. Managers are responsible for promoting compliance with the Code. Failure to comply may result in disciplinary action including retraining, reprimands, suspension or termination, and other adverse consequences. It is the ethical responsibility of all members of the University community to report compliance concerns, improper conduct, and any suspected or actual violations of policy or of the Code. The University has a compliance hotline (866-447-5052, <http://www.yu.edu/Offices-and-Services/Compliance/>) to receive such reports.

➤ *Compliance with Law and Professional Standards*

Each member of the University community is responsible for complying with all foreign and U.S. federal, state and local laws and professional standards applicable to his/her work, as well as University policies and procedures, and for staying current with them. Members of the University community should notify the University’s Office of the General Counsel if at any time they perceive a conflict between these sources of guidance.

➤ *Conflicts of Interest*

All members of the University community occupy a position of trust with the University and, as a result, have a duty of loyalty to the University. Members of the University community are responsible for recognizing the possibility of a conflict of interest and should disclose activities or situations that may result in a conflict of interest or the appearance of a conflict in accordance with applicable conflict of interest policies.

➤ *Confidential Information*

Members of the University community are required to maintain the highest level of privacy and to protect confidential information, including, but not limited to, personal information of donors, personnel records and patient health information. Members of the University community should contact the University’s Office of the General Counsel with any questions as to the confidentiality of any information.

- *Use of University Property*
Members of the University community should only use the University's property for University purposes. However, members of the University community may use the University's property for lawful not-for-profit personal purposes in an incidental and reasonable manner.
- *Destruction of Property and Theft*
Members of the University community should not intentionally damage or destroy the property of the University or others, or engage in theft.
- *Bribes and Kickbacks*
Members of the University community should ensure that payments made by or on behalf of the University are made only for legitimate business purposes of the University. Under no circumstances is it acceptable to offer, give, solicit or receive any form of bribe or kickback.
- *Intellectual Property of the University*
Members of the University community should safeguard the University's rights in its intellectual property, such as trademarks, service marks, patents, copyrights, inventions, and trade secrets.
- *Intellectual Property of Others*
Members of the University community may not reproduce, distribute or alter copyrighted materials without permission of the copyright owner, unless otherwise permitted by applicable law.
- *Respectful Environment*
Members of the University community should treat others with dignity and respect. Members of the University community may not engage in discrimination or harassment. Violent behavior is unacceptable.
- *Substance Abuse*
Members of the University community are prohibited from the unlawful possession, unlawful use, unlawful distribution, or unlawful manufacture of drugs and the unauthorized use of alcohol at any University facilities or in connection with any University activities.
- *Fair Treatment*
Members of the University community are expected to maintain a professional work environment and to treat fellow members in a fair, equitable and impartial manner. Members of the University community should comply with all applicable policies and procedures, including, but not limited to, those regarding the appointment, retention, tenure, work assignments, promotion, demotion or salary of fellow members.
- *Political Activities*
Members of the University community should not seek reimbursement from the University for contributions to political candidates, causes or parties, and should not work on behalf of such causes, parties or candidates during working hours or at any time use the University's facilities or resources for such purposes.
- *Environment, Health and Safety*
Members of the University community are expected to maintain a safe work environment and to comply with all applicable federal, state and city regulations.

- *Educational Records*
Members of the University community are expected to maintain student educational records in accordance with all applicable laws (including, without limitation, the Family Educational Rights and Privacy Act (FERPA)).
- *Financial Reporting and Business Records*
Members of the University community are responsible and accountable for maintaining an adequate system of internal controls over all areas of their responsibility, and maintaining all business records in accordance with laws and regulations regarding the retention of business records.
- *Information Technology and Communications Equipment*
Members of the University community should use the University's information technology systems, including, but not limited to, computers, e-mail, Internet access lines, telephones and voice mail, only for University purposes. However, members of the University community may use the University's information technology systems for lawful not-for-profit personal purposes in an incidental and reasonable manner.
- *Fundraising and Institutional Advancement*
Members of the University community must act with fairness, honesty, and integrity in connection with the solicitation and receipt of gifts to the University. Members of the University community must comply with all federal and state laws and regulations, and not take any action, or omit to take any action, that may mislead or otherwise deceive a donor.
- *Education and Teaching Standards*
Members of the University community are expected to provide the highest quality of education and training to the students, and respect each student as a valuable individual. Members of the University community are expected to maintain a professional environment conducive to the development of the students, to promote academic freedom, and to work together to advance the education of the students. Members of the University community should not tolerate plagiarism or falsification.
- *Research Principles and Standards*
Members of the University community are expected to maintain the highest standards of professional conduct and integrity in research. Members of the University community should propose, conduct, and report research with integrity, objectivity and honesty. Members of the University community should protect people and humanely treat animals involved in research or teaching. Members of the University community should only use research funds for their designated purposes, should comply with all approved protocols and all federal and state laws and regulations. Members of the University community should not tolerate plagiarism, falsification, or fabrication of research data, or other scientific misconduct.
- *Patient Care Standards*
Members of the University community involved in patient-related activities should strive to deliver quality and comprehensive patient care and take appropriate action to foster continuous improvement through scientific knowledge that is shared with patients, colleagues and the public. Members of the University community should provide patients with information necessary to make informed health care decisions, prepare clear, honest and accurate patient medical documentation in a timely manner, and maintain confidentiality in accordance with existing University policies and procedures, federal laws and state regulations.

- *Obligating the University*
Members of the University community must not make any agreements on behalf of the University, unless expressly authorized to do so. Any offer to enter into such an agreement must be referred to the University's Office of the General Counsel and/or the Procurement Services department.
- *Use of University Human Resources*
The time and effort of other members of the University community, and of the students, may only be used for University purposes.
- *Public Relations*
Members of the University community should refer all media inquiries and requests to the University's Office of Communications and Public Affairs. Additionally, members of the University community should not respond to such inquiries or requests for information unless otherwise authorized by the Office of Communications and Public Affairs.
- *Regulatory or Legal Inquiries*
Members of the University community should refer inquiries from governmental officials and entities to the University's Office of the General Counsel. Members of the University community should not respond to such inquiries unless they are otherwise authorized by the Office of the General Counsel or required by law.

For interpretation, counsel or advice regarding the Code, please contact the Office of the General Counsel (212-960-0051).

For more information:

Albert Einstein College of Medicine website - www.einstein.yu.edu/home/policies.asp

Human Resources website - <http://www.yu.edu/hr>

Procurement Services website - www.yu.edu/procurement

Office of the General Counsel website – www.yu.edu/ogc