



National University of Health Sciences

General Policies

Title: **Conflict of Interest**

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Date: **Adopted: 12/10/1990**

Date(s) Revised: **02/11/92, 04/27/09, 03/17/25**

President

Date

POLICY STATEMENT

It is the policy of National University of Health Sciences (NUHS) that no employee (or member of the employee's immediate family) shall engage in activities with any related outside organization, which may result in personal benefit at the expense of the University, or which may influence the employee's decisions involving the University.

Illustrations of Conflicts of Interest

The following are some examples of the types of activities that may be considered a conflict of interest:

- Financial Interests – holding a substantial financial interest (10% or more) in any related outside organization, directly or indirectly, by an employee or the employee's family members. Ownership or trading of any related outside organization's securities in amounts less than a substantial financial interest shall not violate this policy provided that the purchase and/or sale of such securities is not made as a result of non-public information. Should the employee be involved in research funded by Public Health Services (PHS) under the auspices of NUHS, the employee is subject to the terms of the NUHS policy "Financial Conflict of Interest in Research".
- Gifts, Entertainment or Valuable Services – acceptance of compensation, commissions, fees, gifts or other valuable goods or services from any related outside organization. This policy would not be violated by the acceptance of items of nominal value or entertainment incidental to the University's business, which merely indicate personal friendship or tokens of respect and are not intended to influence the employee's performance of duties for the University.
- Privileged Information and Conflicting Business Opportunities – the use of non-public, privileged, or proprietary information, or the employee's official position for personal gain or that of a family member, or disclosure of such information to others.

- **Borrowing of Money** – the borrowing of money from any related outside organization, except loans or advances from banks or other financial institutions on commercial loans.

Definitions:

Family Members – an employee's spouse, any dependent or any other person who lives in the household of the employee.

Related Outside Organization – Any person, partnership, firm, corporation, trust or government entity of which the employee has knowledge, and which has one of the following relationships with NUHS:

- Supplies to the University goods or services, including the sale or lease of land;
- Lends money to the University;
- Transacts any other business with the University.

Consultation:

An employee should discuss any outside relationship that may involve a possible conflict of interest with the employee's supervisor. The supervisor will make the determination as to whether or not a conflict of interest will arise.

Non-Compliance With Policy:

Failure to comply with this policy shall result in appropriate action by the University, including termination of employment or when warranted, legal proceedings.