



1.2 Standards of Ethical Conduct

1.2-a. Standards of Ethical Conduct, Introduction and Purpose

The Standards of Ethical Conduct applies to these groups, referred to as members of the Walsh University community:

- Employees and students of Walsh University
- Consultants, contractors and others, when performing services for the University or interacting with members of the University community, acting on behalf of the University, or otherwise required under contract to comply with these standards.

Members of the Walsh University community are expected to conduct themselves ethically, honestly and with integrity in all dealings. This means principles of fairness, good faith and respect consistent with laws, regulations and University handbooks and policies govern our conduct with others both inside and outside the community. These principles also guide our behaviors online and through social media.

Regardless of our various individual affiliations, each Walsh community member is expected to conduct the business of the University in accordance with our shared mission statement and core values and act in accordance with reason as we make decisions, exercising sound judgment and serving the best interests of the institution and the community.

1.2-b. Respect for Others

Walsh University promotes a professional and congenial work environment and takes all necessary steps to ensure that the work environment remains pleasant for all employees. Accordingly, everyone is expected to demonstrate professional courtesy and consideration towards fellow campus members, customers, vendors, the public or anyone else with whom they come into contact with while conducting business on behalf of Walsh University. The same is expected of our physical work environments. We all reflect Walsh University and represent Walsh to others in the community and those that visit us on campus.

Employees are expected to exhibit professional workplace behavior at all times. Unprofessional behavior includes, but is not limited to, malicious, obscene, threatening or intimidating acts, acts that disparage coworkers or that might constitute harassment or bullying. Examples of such conduct may include offensive comments meant to intentionally harm someone's reputation. Unprofessional behavior also includes refusal to follow a direct and lawful instruction from a supervisor, using inappropriate or offensive language, screaming, yelling, threatening or attempting to harm a co-worker, sabotaging another's work, stalking others, making false statements about others with malice that cause harm, or

publicly disclosing another's private information. Engaging in unprofessional workplace behavior will be subject to corrective action, including separation from the University.

Walsh University opposes unjust discrimination as a matter of human dignity. Walsh University does not discriminate on the basis of race, age, sex, color, disability, national or ethnic origin, or status as a veteran in the administration of our policies and programs. This statement applies to all academic programs, all athletic programs, and to all policies and procedures concerning students and student activities. This statement applies to all personnel and administrative policies. Walsh University is a religious institution of higher education in the Catholic-faith tradition and is protected by the Religious Freedom Restoration Act (RFRA) and the First Amendment.

1.2-c. Compliance with Laws and Applicable Policies and Procedures

University policies and procedures are designed to inform our everyday responsibilities, to set standards and to give University community members notice of expectations. Members of the University community are expected to transact all University business in conformance with policies and procedures and accordingly have an obligation to become familiar with those that bear on their areas of responsibility. Each member is expected to seek clarification on a policy or other University directive found to be unclear, outdated or at odds with University objectives. It is not acceptable to ignore or disobey policies if one is not in agreement with them, or to avoid compliance by deliberately seeking loopholes.

University business is to be conducted in conformance with legal requirements, including contractual commitments undertaken by individuals authorized to bind the University to such commitments. The acceptance of an agreement, including sponsored project funding, may create a legal obligation on the part of Walsh University to comply with the terms and conditions of the agreement and applicable laws and regulations. Therefore, only individuals who have authority delegated by an appropriate University official may enter into agreements on behalf of the University.

In some cases, University employees are also governed by ethical codes or standards of their professions or disciplines. It is expected that those employees will comply with applicable professional standards in addition to laws and regulations.

1.2-d. Confidentiality, Privacy, and Information Security

Walsh University community members receive and generate various types of confidential, regulated, proprietary and private information on behalf of the University. All members of the community are expected to comply with all applicable rules, laws, and regulations (whether federal, state, local or foreign), contractual obligations, and University policies pertaining to the use, protection and disclosure of this information. When disaffiliating from Walsh, community members must return all sensitive University data unless an exception has been granted in writing.

1.2-e. Financial Responsibilities and Internal Controls

Members of the Walsh University community are expected to employ sound business practices and exercise prudent financial management in their stewardship of University resources and protection and management of University financial assets. All University accounting and financial records, tax reports, expense reports, time sheets and effort reports, and other documents including those submitted to government agencies must be accurate, clear, complete and submitted by established deadlines. All published financial reports will make full, fair, accurate, timely and understandable disclosures as

required under generally accepted accounting principles, bond covenant agreements, other requirements, and our core values.

1.2-f. Use of University Resources

University resources are reserved for business purposes on behalf of the University. They may not be used for personal gain, and may not be used for personal use except if the manner is incidental, and reasonable in light of the employee's duties. University resources include, but are not limited to:

- University systems (e.g., telephone systems, data communication and networking services)
- The Walsh domain for electronic communication forums
- Walsh name, logo, and letterhead
- University equipment (e.g., computers and peripherals, University vehicles)
- Walsh facilities
- Procurement tools such as purchasing cards, travel cards and petty cash
- University records including student, employee, donor, sponsor, and patient records

1.2-g. Conflict of Interest

Relationships between Walsh and its vendors or sponsors must be free of any real or perceived impropriety or favoritism. Outside professional activities, private financial interests or the receipt of benefits or gifts from third parties can cause an actual or perceived conflict of interest.

This Conflict of Interest policy serves as an umbrella policy that establishes University wide expectations regarding conflicts of interest. Employees are also subject to additional conflict of interest standards described in related University policies, including but not limited to 1.8-e, Employee-Student Consensual Relations, and 1.8-s, Nepotism Policy. Employees are responsible for promptly disclosing any actual or potential conflict of interest to their area Vice President in accordance with University procedures.

Unless documented as an essential function of a position, University community members should not solicit any gift, and should not personally accept any material gift, gratuity or payment, in cash or in kind, from any third party seeking to do business with the University or currently doing business with the University.

1.2-h. Reporting Suspected Violations

Adherence to these standards requires that any suspected violations of applicable standards, policies, laws or regulations be brought to the attention of the appropriate official. Members of the Walsh community should report suspected violations of applicable laws, regulations, government contract and grant requirements, these standards and University policies and procedures. This reporting should normally be made initially through management channels, beginning with the immediate supervisor. If for any reason it is not appropriate to report suspected violations to the immediate supervisor (e.g., the suspected violation is by the supervisor), or the employee is uncomfortable doing so, individuals may go to a higher level of management within their department or Human Resources. Managers and persons in supervisory roles are required to report allegations presented to them or that come to their attention in the ordinary course of performing their supervisory duties. Every concern is treated seriously and reviewed in the appropriate manner.

All members of the Walsh University community are expected to cooperate fully in the investigation of potential violations of University policy and applicable rules, laws, or regulations.

Walsh policy prohibits retaliation against an individual who in good faith reports or provides information about concerns or suspected violations. Retaliation is an adverse action taken because an individual has made a report or has participated in an investigation. False accusations made with the intent of harming or retaliating against another person may subject the accuser to disciplinary action.

Walsh University encourages reporting through the management channels so that the allegations may be investigated for substantiation. To ensure the highest standards of ethical conduct and accountability, our organization provides a secure and anonymous channel for reporting concerns related to fraud, waste, financial misconduct, or other unethical behavior. Reports can be submitted anonymously through our reporting website at <https://wuinform.walsh.edu>. This system is designed to protect the confidentiality of all reporters, ensuring that your identity will not be disclosed unless you choose otherwise. All submissions will be reviewed promptly and handled with the utmost discretion and professionalism.

1.2-i. Consequences of Violation

Confirmed violations will result in appropriate disciplinary action up to and including termination of employment or other relationships with the University. Where appropriate, referrals may be made to law enforcement officials.

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