



## Code of Ethical Business Conduct

*"A college administrator is expected to be more than a financier, more than a school master. He [or she] must be in some tangible and expressive way 'the corporate consciousness of the College.'"*<sup>1</sup>

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### I. INTRODUCTION

It is the goal of Dartmouth College to adhere to the highest ethical standards in all that it does. Dartmouth College expects that those who are part of the Dartmouth community, including trustees, faculty, staff, and student employees ("Dartmouth Personnel") will adhere to such standards in their dealings with each other and with those beyond the Dartmouth community. Ethical business conduct calls for all Dartmouth Personnel to assume responsibility for safeguarding and preserving Dartmouth's assets and resources in the fulfillment of its mission. Dartmouth will comply fully with all relevant laws and all contract and grant requirements, as well as with its own high standards of integrity and quality. Dartmouth Personnel are expected to assume personal responsibility and accountability for understanding relevant laws, regulations, and contract and grant requirements. In addition to complying with specific laws or regulations that govern business activities, standards of fairness, honesty, and respect for the rights of others will govern Dartmouth's conduct at all times.

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### II. ETHICAL PRINCIPLES

#### a. Compliance with Laws

Dartmouth College will transact its business in compliance with the laws of the jurisdictions in which it does business. Dartmouth Personnel will familiarize themselves with any legal

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*1 - William Jewett Tucker, My Generation (1919), p. 250.*

obligations arising out of the work done for Dartmouth, including but not limited to the obligations to comply with applicable recordkeeping requirements and not to retaliate against anyone who reports a suspected violation of the law. If questions arise regarding compliance with the law, or if it appears that one of Dartmouth's policies conflicts with the relevant law, the person who becomes aware of that situation should contact the office at Dartmouth that has oversight responsibility for the policy, or the Office of the General Counsel.

#### **b. Contractual and Grant Obligations**

In addition to its commitment to comply with applicable laws, Dartmouth College recognizes its contractual obligations to donors, the government, suppliers, research sponsors, employees, and others with whom it contracts. Regardless of the source of funds, Dartmouth College will adhere to its contractual obligations.

#### **c. Integrity and Quality**

Dartmouth Personnel should recognize that Dartmouth College has earned and must maintain a reputation for integrity and quality that goes beyond compliance with laws, regulations, and contractual obligations. Dartmouth strives for excellence in administration as well as academics. Even the appearance of misconduct or impropriety can cause severe damage to Dartmouth's reputation. As such, Dartmouth Personnel must strive at all times to maintain the highest standards of quality and integrity.

#### **d. Conflict of Interest**

Dartmouth Personnel should avoid situations that create or appear to create conflicts between their personal interests and Dartmouth's interests. All decisions made by Dartmouth Personnel in the course of their professional responsibilities are to be made solely on the basis of their desire to promote Dartmouth's best interests. If an individual's personal interests might lead an independent observer reasonably to question whether the individual's actions or decisions on Dartmouth's behalf are influenced by those personal interests, the individual should recuse himself or herself from the decision-making process and notify the responsible Dartmouth officials, as described in more detail in the [Conflict of Interest Policy](#) of Dartmouth College.

In addition, it is Dartmouth's policy to comply in all respects with state and federal laws concerning conflicts of interest, including the New Hampshire Pecuniary Benefit Law, which

governs transactions between New Hampshire charitable organizations and their trustees and officers. Further information concerning the Pecuniary Benefit Law may be obtained from the Office of the General Counsel.

#### **e. Confidential Information**

Dartmouth Personnel may have access to confidential, proprietary, and/or private information. Those who have access to this information may not make any unauthorized use or disclosures of the information, either during or after employment.

#### **f. Antitrust Considerations**

Like other economic enterprises, colleges are subject to federal and state antitrust laws, which are aimed at protecting competition. For this reason, Dartmouth Personnel should avoid agreements or exchanges of information with other colleges and universities that adversely affect economic competition between institutions. Dartmouth Personnel should never enter into agreements with other colleges or universities regarding future tuition, fees, financial aid, or salary levels. In addition, it is ordinarily inadvisable for Dartmouth Personnel to disclose or exchange future plans or projections concerning these subjects with other colleges or universities. Dartmouth Personnel should not participate in surveys concerning these matters unless the survey seeks public information or information that is historical in nature. Dartmouth Personnel who have affiliations with other colleges and universities (e.g., on the board of trustees of another institution) should not disclose Dartmouth's non-public business information to the other institution, or vice versa.

#### **g. Financial Reporting**

All Dartmouth financial information, including financial reports, tax returns, expense reimbursements, time sheets, and other documents, including those submitted to government agencies, must be accurate, clear, and complete. All entries in Dartmouth's books and records, including departmental accounts and individual expense reports, must accurately reflect each transaction. Retention of these documents shall conform to established Dartmouth record retention policy.

#### **h. Authority to Contract**

All transactions must be authorized by appropriate individuals and conducted in accordance with Dartmouth's [Signature and Requisition Authority Policy](#).

Individuals who enter into contracts on Dartmouth's behalf should confirm the extent of their authority to do so on a regular basis.

**i. Accepting Gifts**

Employees representing the College are expected to uphold the integrity of the institution while conducting business with outside organizations, vendors and individuals. All employees are expected not to compromise any business transaction in exchange for personal benefit such as gifts. Promotional items, of an advertising nature, an occasional business meeting meal, or items of insignificant value, not to exceed the value of a business meeting meal, are acceptable. Gifts outside of these guidelines would be deemed unacceptable and shall be returned.

**j. Additional Administrative Policies**

Additional and more detailed and explicit policies may govern particular areas of administration such as human resources, finance, information technology, or research. It is the responsibility of each person working in those areas to learn and adhere to those policies. A selection of related policies is provided below. Additional policies may be found by visiting departmental web pages.

- Peer to Peer File Sharing and Copyright Law:  
<http://www.dartmouth.edu/copyright/peer2peer/>
- Research Misconduct Policy and Procedures:  
<http://www.dartmouth.edu/~osp/resources/policies/dartmouth/MisconductPolicy.html>
- Business Expense Policy: <https://policies.dartmouth.edu/policy/business-expense-policy>
- Accepting Gifts: <https://policies.dartmouth.edu/policy/gift-acceptance-policy>
- Procurement Sole Source and Competitive Bidding Policy:  
<https://policies.dartmouth.edu/policy/sole-source-competitive-bid-policy>
- Employment Policies: <http://www.dartmouth.edu/~hrs/policy/>

**k. Consequences of Violations of Dartmouth's Policies**

Each person is responsible for ensuring that his or her own conduct and the conduct of anyone reporting to him or her fully comply with this Code and with Dartmouth's policies. Violations may

result in the taking of appropriate disciplinary action up to and including discharge from employment. Disciplinary action will be taken in accordance with the procedures applicable to faculty or staff, as the case may be. Conduct representing a violation of this Code may, in some circumstances, also subject an individual to civil or criminal charges and penalties.

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### **III. REPORTING OF SUSPECTED VIOLATIONS<sup>2</sup>**

#### **a. Reporting to Management**

Dartmouth Personnel should report suspected violations of applicable laws, government regulations or Dartmouth policies, government or industrial contract and grant requirements, or this Code. This reporting should normally be made initially through standard management channels, beginning with the employee's immediate supervisor. Alternatively, employees may go directly to Human Resources, Institutional Diversity and Equity, Safety and Security, Risk Management, the Office of the Executive Vice President for Finance and Administration, or the Office of the General Counsel, to report suspected violations or problems. Dartmouth understands, however, that making a report to any of these individuals and offices may not be appropriate or comfortable for any number of reasons. In these cases, people may look to the Dartmouth Compliance and Ethics Hotline. The Hotline can be accessed either through a toll-free number (888-497-0516) or through a website: [www.dartmouth.ethicspoint.com](http://www.dartmouth.ethicspoint.com). The telephone number and website are owned and hosted by EthicsPoint, not Dartmouth. Reports can be made anonymously, but this is not required. In either case, providing as much information as possible will aid Dartmouth in its investigation of the reported concern. You can find more information on the Risk and Internal Controls Services webpage: [www.dartmouth.edu/~rmi](http://www.dartmouth.edu/~rmi).

#### **b. Cooperation**

All employees should cooperate fully in the investigation of any misconduct.

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*2 - Channels of reporting described in this Code are not intended to supersede specific grievance or other procedures established for particular situations. Where applicable, community members are advised to utilize such procedures. See, e.g., the equal opportunity grievance procedure:*

<http://www.dartmouth.edu/~ide/policies/grievance/index.html>

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#### **IV. QUESTIONS ABOUT THIS CODE**

Questions about this Code may be directed to the Office of the Executive Vice President for Finance and Administration or the Office of the General Counsel.