

January 9, 2009

To: Finance and Administration Department Heads

From: Peggy Plympton

A few years ago we successfully developed and implemented a formal Code of Ethics within the Finance and Administration area. We believed that while strong ethics have always been a part of our practice, our employees should have identified standards that let them know what is expected and helps them recognize and understand ethical issues and how to deal with them.

We identified that this should be discussed with our staff annually. Let this email serve as a reminder to you to take some time to discuss this important topic at your next staff meeting. In addition, have each staff member read the code and sign the response form. The signed forms should be maintained within your department for the current year plus two.

I have attached:

- 1) A copy of the Code of Ethics form for your employees to read and sign,
- 2) A form showing examples of what is meant by each of the code values, and
- 3) A list of Code of Ethics talking points to assist you when you are holding discussions with your staff.

Thanks for your help. If you have any questions or need additional information, please feel free to contact me.

**Lehigh University  
Finance and Administration  
Code of Ethics**

It is imperative that all Finance and Administration (F&A) personnel adhere to the highest principles and ethical standards. Each F&A employee is held to the highest degree of trust and is expected to abide by the following values:

- 1. Give primary consideration to the objectives and policies of the University.**
- 2. Act with honesty and integrity, avoiding actual or apparent conflicts of interest between personal and professional relationships.**
- 3. Be knowledgeable of and comply with laws, rules and regulations of federal, state and local governments and all University policies and procedures.**
- 4. Decline any gratuities or personal gifts of more than nominal value. Grant all competitive vendors equal consideration insofar as state or federal statute and University policy permit.**
- 5. Respect the confidentiality of information acquired in the course of business and refrain from using this confidential information for personal advantage.**
- 6. Protect and ensure the efficient use of all University assets and resources.**
- 7. Strive to provide information that is accurate, complete, objective, relevant, timely and understandable.**
- 8. Promote ethical behavior as a responsible partner among peers in the work environment and the community.**
- 9. Treat co-workers and other colleagues with respect, fairness and good faith, and promote conditions of employment that safeguard the rights and welfare of all employees of the university.**

\* \* \* \* \*

This code should be reviewed and signed annually by every F&A employee.

I have read and agree to abide by the Lehigh University Finance and Administration Code of Ethics. If I have any questions regarding aspects of my situation or if I have noted concerns regarding another employee, I know that I can discuss this with my supervisor, contact a member of the Human Resources Office or the Internal Audit Office, call the Ethics Hotline (8-2500) or the University Ombudsperson.

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

**Lehigh University**  
**Finance and Administration**  
**Examples of Code of Ethics Values**

To provide additional guidance: the following lists examples of what is meant by each of the values mentioned within the F&A Code of Ethics.

**1. Give primary consideration to the objectives and policies of the University.**

Some Examples:

- Maintain the University's interests in dealing with any vendors for the purchase of products or services
- Request reimbursement for only allowable and accurate travel expenses
- Keep all outside business interests separate from University responsibilities

**2. Act with honesty and integrity, avoiding actual or apparent conflicts of interest between personal and professional relationships.**

Some Examples:

- Ensure proper contracts and pricing is used when employing a University vendor for personal services
- Lehigh's requirements must take priority over those of any other employer
- Disclose apparent conflicts of interest
- Refrain from making decisions when they may benefit you personally

**3. Be knowledgeable of and comply with pertinent laws, rules and regulations of federal, state and local governments and all University policies and procedures.**

Some Examples:

- For all new construction ensure compliance with building codes and fire regulations
- Remit all taxes accurately and on a timely basis
- Do not copy unauthorized software or violate University software policy
- Do not discriminate in your hiring practices

**4. Decline any gratuities or personal gifts of more than nominal value. Grant all competitive vendors equal consideration insofar as state or federal statute and University policy permit.**

Some Examples:

- Do not accept any cash gifts from vendors or non-cash items worth more than a nominal value
- Utilize bidding procedures when required
- Minimize sole sourcing and fairly evaluate bids received

**5. Respect the confidentiality of information acquired in the course of business and refrain from using this confidential information for personal advantage.**

Some Examples:

- Do not reveal or use personnel information maintained in Banner or other sources for other than University purposes
- Keep vendor bid information confidential – do not share pricing and terms/conditions
- Do not share confidential information with other employees unless it is part of their responsibilities

**6. Protect and ensure the efficient use of all University assets and resources.**

Some Examples:

- Do not tolerate the inappropriate use of University funding and equipment
- Protect the information stored on the University's computers
- Minimize personal calls and email
- Lock desks and offices when unattended
- Provide good financial stewardship over Banner indexes
- Do not use University equipment for personal purposes
- Make environmentally appropriate choices

**7. Strive to provide information that is accurate, complete, objective, relevant, timely and understandable.**

Some Examples:

- Ensure financial reports are accurate and timely
- Complete time reports accurately and ensure that they are adequately supported
- Verify source of information prior to recording the data
- Process all invoices and payroll information on a timely basis
- Thoroughly complete all purchase requisitions

**8. Promote ethical behavior as a responsible partner among peers in the work environment and the community.**

Some Examples:

- Do not use a position of authority or friendship with other employees to attempt to circumvent University policies
- When ethical concerns arise, report concerns through the proper communication channels via a supervisor or the ethics hotline (8-2500)
- Set example for others in all decision making

**9. Treat co-workers and other colleagues with respect, fairness and good faith, and promote conditions of employment that safeguard the rights and welfare of all employees of the university.**

Some Examples:

- Adhere to all human resources guidelines and practices
- Be tolerant of views of others
- Do not discriminate in hiring practices
- Establish a work environment that supports all individuals

**Lehigh University  
Finance and Administration Code of Ethics**

**Talking Points**

**Why is there a need for a Finance and Administration Code of Ethics?**

The Code of Ethics is important because our employees are making business decisions every day that affect them and the university i.e.: dealing with vendors, hiring new personnel, preparing financial information, etc. We have a responsibility to our trustees, donors, students, the larger community and ultimately, ourselves, to ensure that the highest standards of ethics, integrity, and fairness are maintained in all dealings. We must also provide the utmost level of confidence in our administrative business processes and financial data.

The Code sets standards for the employees and lets them know what is expected. It also helps employees understand ethical issues so that they can recognize them and deal with them properly.

**How does this Code fit with the annual review of the University's Conflict of Interest Policy?**

A strong code of ethics and conflict of interest policies are necessary for any successful organization. Although in some organizations these policies are combined into one, at this point in Lehigh's evolution we are maintaining them as two separate documents.

**Why does the Code need to be reviewed annually?**

It is important the employees know and remember that the University places importance on maintaining good ethical standards. Signing it annually is a reminder that the implementation of the standards is a responsibility of us all.

**What is meant by gifts of "nominal value"?**

Certain vendors may offer "gifts" to University employees. Any gifts that are accepted must always be occasional, reasonable and appropriate. Items such as dinners, fruit baskets, etc. can be accepted. Gifts such as trips to resorts, free airfare, etc. should not be accepted because they are excessive. A cash gift should never be accepted. The appropriateness of any gift should be discussed with the employee's supervisor prior to acceptance.

**Why do ALL F&A employees have to review the code?**

The implementation and maintenance of strong ethics is a responsibility of everyone. All F&A employees should be aware of what is expected.

**What should an employee do if he/she observes to be non-ethical behavior by another employee?**

If an employee notices what he/she believes to be unethical behavior by another employee they have several options available. The employee could: 1) talk about their concerns with their supervisor; 2) report their concerns on the University's Ethics Hotline at 8-2500; 3) speak with someone within the Human Resources Department; or 4) contact the University's Ombudsperson at 8-3428.