

Code of Conduct

Date: February 2009

The College Code of Conduct includes: the [conflicts of interest policy](#), [acceptance of gifts policy](#), [whistleblower protection standard](#) and [reporting of violations](#).

CODE OF CONDUCT

As representatives of the College, all employees- faculty and staff- are expected to conduct themselves in a professional and ethical manner, maintaining high standards of integrity and the use of good judgment. Employees are expected to be principled in their business interactions and act in good faith with individuals both inside and outside the campus community. They should act with due recognition of their position of trust and loyalty with respect to the College and its students, research sponsors and donors.

Employees are expected to comply with all college policies and procedures, laws and regulations, and contractual, grant and other obligations, public or private, and to safeguard College property and funds. Set forth below are additional policies relating to conflicts of interest, acceptance of gifts, "whistleblower" protection, and reporting of violations.

CONFLICTS OF INTEREST

A conflict of interest exists when an employee (or his/her immediate family) engages in a personal activity or has a direct or indirect business interest in a transaction involving Bowdoin College. Examples include decisions to purchase goods, hire a vendor, hire a candidate, or make an investment decision. A conflict of interest may also exist if an employee makes personal use of information acquired through his/her employment at Bowdoin College.

Management of the College must submit an annual questionnaire in which they are required to report potential conflicts of interest to the Senior Vice President for Finance and Administration & Treasurer that are then reported to the Audit Committee of the Board of Trustees. In addition, any employee of the College is

expected to report, on his/her own initiative, any conflict of interest that may significantly affect the College. Examples of conflicts that should be reported include business relationships between the employee (or his/her immediate family) and the College, its suppliers, research sponsors or donors; outside board memberships of the employee (or his/her immediate family) that might affect the College's business dealings or reputation; any outside employment or consulting relationships of the employee that might be of interest to the College; and holding by the employee (or his/her immediate family) of any local political office. For guidelines regarding conflict of interest in relationship to sponsored projects involving research and education please see [Bowdoin College Financial Interest Disclosure Policy for Sponsored Projects](#).

It should be understood that conflicts of interest are not, in and of themselves, wrongful or even disadvantageous. The College maintains relationships and derives support from many people and organizations. This web of relationships inevitably leads to different parties having different interests. It is important, however, that the College be in a position to identify conflicts of interest so that management and the Board can take appropriate steps to assure fair treatment of the College in its business dealings, and to preserve and strengthen those relationships that will advance the College's mission in the future.

It is not possible to list every possible conflict. Ultimately it is the responsibility of each employee to exercise good judgment and avoid (or appropriately disclose) any situation that could appear to be a conflict of interest or raise the appearance of impropriety.

ACCEPTANCE OF GIFTS POLICY

Employees of the College may not solicit, obtain, accept or retain any personal benefit from any supplier, vendor, donor, customer, client, public official, or any individual or organization doing or seeking to do business with the College. For the purposes of this policy, personal benefit includes, but is not limited to, gifts, gratuities, favors, certain travel, services, compensation, use of vacation residences, discounts, special treatment, or anything of

monetary value exceeding \$50.00. Reasonable exceptions may include purchase of a business meal, or consumable gifts offered to an entire workgroup during a holiday season, where rejection would damage the spirit in which the gift was offered.

This policy does not prohibit members of the faculty and other employees from receiving honoraria or reimbursement for travel and other expenses from grant agencies, foundations, or other colleges or universities. This policy does not prohibit employees from receiving compensation or per diem payments for service on outside boards of directors.

Reasonable exceptions to this acceptance of gift policy may also be granted for activities that further development opportunities and donor relations. Any such exceptions should be reviewed and approved by the Senior Vice President for Planning and Development and Secretary of the College.

"WHISTLEBLOWER" PROTECTION STANDARD

The College will take steps to help ensure that employees who come forward in good faith to report suspected violations of law, this Code of Conduct or other college policies will be protected from retaliation in employment practices at Bowdoin College.

REPORTING SUSPECTED VIOLATIONS AND CONCERNS

You are encouraged to report violations or concerns about violations of law, this Code of Conduct or college policies that come to your attention. Inappropriate activity can range from clearly illegal activity (such as falsifying data or misusing College funds) to activity that is lawful but unethical (such as purporting to speak on behalf of the College without proper authority).

Any suspected violations of this Code including improper offers or suggestions from a supplier, vendor, or anyone seeking to do business with the College, and any activity that could be perceived as presenting a serious conflict of interest should be reported anonymously by going to www.ethicspoint.com. Any suspected violations may also be reported to the Senior Vice President for Finance and Administration & Treasurer, or in her/his absence, to

any other senior officer or the President. Appropriate cases will be referred to the Audit Committee of the Board of Trustees.

Disciplinary actions for proven violations of this Code, or for improper retaliation against anyone who reports possible violations, will be determined on a case-by-case basis and may include termination of employment. Those who violate this Code may also be subject to civil and criminal charges in some circumstances.

Questions concerning this policy may be directed to the Senior Vice President for Finance and Administration & Treasurer, Bowdoin College, 5600 College Station, Brunswick, Maine 04011, Telephone: 207-725-3242.