

# TEMPLE UNIVERSITY

## POLICIES AND PROCEDURES

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| <b>Title:</b>                      | Gifts and Conflicts of Interest – All Employees |
| <b>Policy Number:</b>              | 04.16.03  |
| <b>Issuing Authority:</b>          | Board of Trustees                               |
| <b>Responsible Officer:</b>        | Chief Compliance Officer                        |
| <b>Date Created</b>                | December 13, 1983                               |
| <b>Date Last Amended/Reviewed:</b> | November 2022                                   |
| <b>Date Scheduled for Review:</b>  | July 2024                                       |
| <b>Reviewing Office:</b>           | Office of University Counsel                    |

### **Scope of Policy**

Temple University personnel at various administrative levels occupy positions in which they directly or indirectly influence the expenditure of large amounts of money. In order to avoid any possible conflict of interest, or appearance thereof, University personnel must be extremely cautious and circumspect with respect to gifts. Even though there may actually be no wrongdoing intended, the knowledge that a Temple University representative has accepted a gift from those who do business with the University can easily be misinterpreted.

### **Policy**

Except when there is an exchange of gifts between personal friends, no University representative may accept a gift which exceeds the value of \$50.00 from any firm or individual doing business with the University. Gifts exceeding this value are to be turned over to the University.

Gifts of real or personal property to the University may be accepted only by the President or the Vice President of Finance and Treasurer.

### **Notes**

#### **1. History:**

The June 23, 1988, amendment raised the allowable maximum gift value from \$25 to \$50 and included guidelines relating to selected situations.

#### **Last Amended:**

Adopted by the Board of Trustees on December 13, 1983.

Amended by the Business and Finance Committee and the Executive Committee, the latter acting on behalf of the Board of Trustees, on June 23, 1988.

November 2022: Updated to reflect current Bylaws and job titles.

## **2. Cross References:**

Board of Trustees Policy #01.35.01

Conflict of Interest – Trustees and Hospital Governors Board of Trustees Policy #04.16.01

Conflict of Interest – All Employees Board of Trustees Policy #04.16.02

Conflict of Interest – Faculty Policy #04.16.02

**TO:** THE TEMPLE COMMUNITY

**SUBJECT: EXAMPLES OF CONFLICT OF INTEREST AND GIFT ISSUES**

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In order to help the Temple Community, understand and apply the University policies pertaining to Conflict of Interest and the receipts of gifts, selected situations and how you deal with them are enumerated below:

1. The following activities are permitted ONLY when PRIOR WRITTEN APPROVAL of your cognizant Vice President AND University Counsel are obtained when:
  - a. Hiring, supervising, or maintaining the time and attendance records by a Temple University employee for relatives.
  - b. A Temple employee travels at vendor(s') expense, or he/she is accompanied by a spouse or child who also travels at a Temple vendor(s') expense.
  - c. Receipt of meals, tickets to sporting events, and/or theater in excess of \$50 from a Temple vendor.
  - d. Individuals who negotiate, consummate, or administer contracts on behalf of the University, and obtain special reduced prices for items of personal use from bidders on those contracts, which reduction is not available to the University Community at large.
  - e. Site visits where the Temple employee involved in the decision is fed and entertained by actual or probable vendor(s) and vendor(s') expense in excess of \$50.
  - f. Engaged as a consultant for an actual or probable Temple vendor.
2. The Conflict of Interest covers any area or activity in which an employee may have or appear to have his or her judgement impaired in behalf of the University.
3. Employees or their relatives may not borrow or take loans from the University, except under programs specifically authorized by the Executive Cabinet or by the President.

6/21/88