



Research Foundation – Conflict of Interest Policy

The following policy applies to all Research Foundation employees acting in a significant decision-making position, project directors, or any person who has signature authority for a Research Foundation account. *SUNY faculty and staff employees conducting externally funded programs through the Research Foundation are also included under this policy.* An annual disclosure form is required. Individuals have an option to certify that they have no real or apparent conflicts of interest by simply signing the form.

Research Foundation's policy requires that:

"No officers or employees of the Research Foundation should have any interest, financial or otherwise, direct or indirect, or engage in any business or transaction or professional activity or incur any obligation of any nature that is in substantial conflict with the proper discharge of their duties in the best interest of the Research Foundation."

Prohibited activities include (*references to employees below includes Research Foundation employees and SUNY employees conducting externally funded programs through the Research Foundation*):

1. No officers or employees of the Research Foundation shall accept other employment which will impair their independence of judgment in the exercise of their duties and responsibilities.
2. No officers or employees of the Research Foundation shall accept employment or engage in any business or professional activity which will require them to disclose information confidential to the Research Foundation that they have gained by reason of their position or authority.
3. No officers or employees of the Research Foundation shall disclose information confidential to the Research Foundation acquired by them in the course of their duties except as required by law nor use such information to further their personal interests, unless such information has previously been made public.
4. No officers or employees of the Research Foundation shall use or attempt to use their position to secure undue privileges or exemptions for themselves or others.
5. No officers or employees of the Research Foundation shall engage in any transaction as a representative or agent of the Research Foundation with any business entity in which they, their spouse or any dependent, or any business partners have a direct or indirect financial interest that might conflict with the proper discharge of their duties or responsibilities.

6. No officers or employees of the Research Foundation, or corporation, firm or association of which such person, their spouse or any dependent, or any business partners is a member, shall sell, contract for or provide goods or services to the Research Foundation in connection with a program or project administered through the Foundation in a manner that is inconsistent with the Foundation's established procurement policy.

7. Officers and employees of the Research Foundation shall not, by their conduct, give reasonable basis for the impression that any person can improperly influence them or unduly enjoy their favor in performance of their duties, or that they are affected by kinship, rank, position or influence of any party or person.

8. Officers and employees of the Research Foundation shall abstain from holding personal investments that they have reason to believe may be directly involved in decisions to be made by them or that will otherwise create conflict between their duties in the best interest of the Research Foundation and their private interests.