Conflict of Interest

In the interest of operating the university in a way that exercises good stewardship of its funds and good faith in its business transactions, certain guidelines must be observed by employees in the performance of financial and other transactions.

**Overall Expectation**

Biola employees are to refrain from placing themselves, or allowing themselves to be placed in, situations in which their judgment or actions on behalf of the university may be affected by personal considerations, or in which their loyalty or stewardship to the university may be compromised. The list of situations below illustrates and further defines this expectation, but is not intended to be all-inclusive. Employees facing circumstances which may be in difference to this overall expectation, but which are not specifically covered below, should discuss their situation with their supervisor and Human Resources.

**Gifts/Services**

Biola employees may not accept gifts, gratuities, entertainment or favors, discounts, and services, the value or significance of which might reasonably be expected to interfere with the exercise of independent and objective judgment. Acceptable gifts should be of nominal value—generally under $50—and be usable in one's work or department, rather than strictly of a personal nature.

**Honoraria**

Employees may accept and retain honoraria with the condition that, if the university has incurred expenses (travel, lodging, etc.) in connection with the activity generating the honorarium, the honorarium be used in whole or part to offset those expenses.

**Outside Activities**

Employees may accept appropriate opportunities for participation and service in ministry, humanitarian, civic, community and professional enterprises that are not incompatible with the performance of their assigned responsibilities. Participation in outside activities should occur outside normal work hours; however, if an employee wishes to attend a special function associated with this service, prior supervisory approval to be absent from work is required.

**Outside Employment/Organizations**

The university is open to employees accepting outside work in the form of a second job or a self-employed business activity, provided that it does not result in the following:

- Interference with an employee's regular work hours
- A negative effect on the performance of regular work duties
- The employee being at risk of an accident through fatigue or other conditions

On occasion it may be beneficial for Biola to partner with an outside organization to co-sponsor an event or activity. The responsible dean/senior director must approve all such arrangements in advance, with notification made to the division vice president. This is particularly important if the Biola employee making such arrangements is also affiliated with that organization. If university resources are utilized or funds expended, or if there is a sharing of revenue, the Finance department must review and approve such arrangements. (Note: the rental of Biola resources through
Conference Services is exempt from this approval requirement, unless there is an inferred or implied sanctioning of the event by the university).

Biola employees who are affiliated with other organizations must exercise caution to avoid sharing or using confidential or privileged information acquired in the course of their employment. Such information may include private information regarding other employees, donor lists or contacts, or any information covered under FERPA.

**Purchases**

Employees with signature authority for purchasing should ensure that all purchases of goods and services be made on the basis of the best competitive value available to the university. In determining value, consideration should be given to price, quality, and service. Purchases from a self-owned business, a relative, a business owned by a relative, or from any organization in which an employee has a financial or other special interest should be avoided. Employees may not purchase any goods or services or in any way obligate the university for any goods or services purchased, unless approval has been granted by the Purchasing department.

Affirmation of compliance with the conflict of interest guidelines is required of all officers, managers, faculty, and staff as applicable to their particular position and associated responsibilities.

**Annual Disclosure Requirement for Executive-Level Employees**

To comply with IRS regulations governing non-profit organizations, employees in key positions will be surveyed annually to affirm their continued compliance with this policy, and that they do not have a financial, business, or personal interest that is in conflict or appears to be in conflict with the interests of the university. For the purpose of this policy, key positions are defined as all executive-level positions (pay grades E5 and above).