



XAVIER UNIVERSITY

Conflict of Interest

Effective: April 30, 2008

Last Updated: November 10, 2025

Last Review: November 10, 2025

Responsible University Office: Human Resources

Responsible Executive: Vice President for Human Resources, CHRO

Scope: All University Employees

A. PHILOSOPHY

This policy is to protect Xavier University's (the "University") interest when it is contemplating or actually entering into a transaction by ensuring that such transactions will not be adversely affected by any conflicting interest of a University employee.

B. POLICY

All University employees must:

- Carry out their responsibilities to the University with loyalty and in the best interest of the University;
- Conduct their personal and business matters to avoid actual, potential, or apparent conflict between self-interest and the University's interests; and
- Disclose to the University any actual, potential, or apparent conflicting interests.

C. PROCEDURE

All continuing employees must:

- Acknowledge compliance with this policy by signing the Conflict of Interest Annual Disclosure Statement and returning it within thirty (30) days of start date; and
- Timely disclose to her or his supervisor the nature and extent of any actual, potential, or apparent conflicts of interest as they arise.

Certain employees are more likely to encounter conflicts. These include all employees with the authority to engage in negotiations or contract on behalf of the University. In addition to the foregoing, these employees must also:

- Annually review this policy and acknowledge compliance by signing and returning the Annual Disclosure Statement; and
- Timely disclose in writing to the Office of Legal Affairs the nature and extent of any actual, potential, or apparent conflicts of interest as they arise.

This policy is intended to supplement but not replace any applicable state laws governing conflicts of interest applicable to nonprofit and charitable universities. Other University policies may apply to conflicts of interest.

Please refer to the appropriate policies for additional information.

D. DEFINITIONS

1. Conflict of Interest

A conflict of interest exists when an employee's commitments or obligations to the University may be compromised by the employee's other interests or commitments. Although not all conflicting interests are impermissible, those involving self-gain by the employee or the employee's family may serve to compromise the employee's obligation to the University. An actual or apparent conflict of interest exists where:

- a. An employee's actions or activities involve both an advantage to the employee and any effect on the University's interests; or
- b. An employee's association or involvement with a third party prevents the employee from exercising care, skill or prudent judgment on behalf of the University in performance of the employee's assigned duties.

2. Employee

This policy applies to all full and part-time employees of the University.

3. Family

A conflict of interest also exists where the interest of a family member may serve to compromise the employee's obligation to the University. Family includes the employee's immediate family (spouse, child, parent, or sibling) and in-laws (father-in-law, mother-in-law, son-in-law, daughter-in-law, brother-in-law in-law or sister-in-law).

E. HISTORY

The Conflict of Interest policy was updated with minor changes in December 2025.

F. POLICY REVIEW SCHEDULE

Next Review: To be determined.

Other applicable policies and/or resources: n/a