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Introduction

This guide is designed to provide an overview of certain administrative policies and procedures at the Institute and seeks to provide an understanding of the workings of the Institute and the role of each Institute community member. Support of these policies by all members will help us achieve our goals as an organization. All members of the Institute community are encouraged to familiarize themselves with these policies and procedures so our work environment may be as pleasant, productive, and equitable as possible. Observance of these policies is considered a key responsibility of all Institute personnel, including Faculty, Staff, administrators and supervisors.

The guide describes our policies and procedures as they exist today. As the Institute evolves, the guide will change accordingly. The Institute reserves the right to change, rescind or add to any policies or procedures at its discretion, with or without prior notice -- except for its policy of at-will employment and those policies required by law. It is not intended to create contractual or other legal obligations, for either Faculty and Staff, the Institute or its members.

Classification of Temporary Workers as Employees or Contractors

When a department requests temporary help, the classification of the temporary workers providing the services must be determined. Typically such workers fit into one of the following three categories:

1. Temporary employee of the Institute: An individual who is hired to fill an occasional or seasonal position on a part-time or full-time basis and is paid a wage by the Institute.
2. Employee of a temporary agency who is assigned to the Institute: In this situation, the temporary employee is an employee of a temporary agency, is paid a wage by the agency, and is assigned by the agency to work for a specified period at the Institute.
3. Independent contractor: This is an individual who provides contract services to the Institute and is paid a contract fee by the Institute through Accounts Payable.

There is no single definition of a contractor or an employee. A number of federal and state statutes, as well as precedents of case law including the Internal Revenue Code, Fair Labor Standards Act, and United States Citizenship and Immigration Services regulations determine such classifications. In general, an employee is distinguished from a contractor by the employer's right to direct and control both the way the employee performs the work and the result(s) of that work. The IRS has identified 20 factors for consideration in this analysis. No one factor is considered to be more important than any other, and a worker does not need to display all 20 factors to be considered an employee. Consistency in the application of these factors is required by the IRS:

1. Instructions:
If a worker is required to follow the company's instructions about when, where, and how s/he is to work, employee status may exist.
2. Training:
If the worker is required to undergo company training to any significant extent, employee status may exist.
3. Integration:
If the worker's services are integrated into a company's operations in a way that suggests the worker is subject to the direction and control of the company, employee status may exist.
4. Services rendered personally:
A requirement that services must be rendered personally by the worker implies that the company is interested in the methods used to complete the work and the results, indicating employee status may exist.
5. Assistants:
If the company hires, supervises, and pays assistants for the worker, then employee status may exist. If, on the other hand, one worker hires, supervises, and pays the other assistants

pursuant to a contract by which the worker agrees to provide materials and labor, contractor status may exist.

6. Continuing relationship:

An ongoing relationship between a worker and company suggests employee status, even if the work is not continuous and may even be irregular.

7. Set hours of work:

If the company establishes fixed working hours, this implies control over the worker, signaling that employee status may exist.

8. Full-time work:

If the worker must devote full time to the company and is therefore restricted from doing other gainful work, employee status may exist.

9. Work location:

If work is performed on the company's premises, especially if the work could be performed elsewhere, employee status may exist.

10. Order or sequence of work:

If the work must be performed in an order or sequence established by the company, and the worker is not free to follow his or her own pattern of work, then employee status may exist.

11. Reporting:

If the worker is required to submit regular oral or written reports to the company instead of simply achieving the results, employee status may exist.

12. Payment for services:

Payment by the hour, day, week or month generally implies an employer-employee relationship. Payment by the job or straight commission implies that the worker is more likely a contractor.

13. Payment of expenses:

If the company pays the travel or business expenses of the worker, employee status may exist.

14. Furnishing tools and materials:

If the company supplies tools, materials, or other equipment, employee status may exist.

15. Significant investment:

If the worker does not invest in the facilities used by the worker, employee status may exist. If the worker makes significant investment in the facilities used, contractor status typically exists. (Areas that are often scrutinized are home offices and equipment.)

16. Profit or Loss:

A person who usually does not realize a direct profit or loss as a result of providing services (because they are compensated at a fixed rate) is typically an employee. A person who can realize a profit or loss directly as a result of his or her agreement to provide services is more likely a contractor.

17. Working for one firm at a time:

A worker who performs services for only one company at a time is typically categorized as an employee.

18. Services not available to the general public:

A worker who does not generally make his or her services available to the general public is typically viewed as an employee.

19. Right to discharge:

The right to discharge a worker at any time is a factor indicating employee status. In contrast,

a contractor may not be discharged if the contractor produces results that meet contract specifications. A contractor relationship may only be terminated upon completion of the contract.

20. Right to terminate: A worker with the right to terminate his or her relationship with the company at any time without incurring any liability is generally an employee.

Recruiting and Hiring Temporary Employees

As a rule, the Institute prefers to hire regular employees* to fill its Staffing needs. However, in some instances, the use of temporary employees for limited periods is an appropriate answer to business needs. For example, such employees may be needed to fill short-term job assignments or manage periods of heavy workloads. These temporary employees may not work more than 800 hours in any twelve-month period.

Temporary employees must be supervised by regular, full-time Institute employees. Temporary employees on the Institute's payroll are paid on an hourly basis and must complete timesheets to be signed by their supervisor on a bi-weekly basis. Benefits for temporary employees are limited to state-mandated benefits, such as temporary disability, workers' compensation and unemployment compensation. Temporary employees are not eligible for vacation, paid sick leave, or other leaves of absence.

Temporary employees who work for a temporary employment agency may be entitled to some benefits through their agency, but are not eligible for *any* benefits through the Institute. Temporary agency employees complete payroll forms and time cards provided by their agency. The Institute supervisor must sign the time cards for these employees and submit a copy of the signed time card to Human Resources so that the agency's invoice can be paid.

In the event that a department needs the help of temporary employees, the person responsible for filling the hiring need should contact Human Resources for assistance with the hiring process. Candidates for temporary positions must be informed that the job is temporary. Upon commencing work at the Institute, all temporary employees must provide proof of eligibility to work in the United States, appropriate payroll documentation, and a work permit if under age 18.

*Regular employees are defined as those in established positions of the Institute with no time limit placed on the term of their employment and who are eligible for benefits based on their full-time (35 to 40 hours per week) or part-time (25 to 34 hours per week) schedule.

Recruiting and Hiring Temporary Contract Workers

As a rule, the Institute prefers to hire regular* employees rather than contractors to fill its staffing needs. In most instances, people hired by the Institute are considered to be employees, as defined by the IRS for tax reporting purposes (please see the Classification of Temporary Workers policy for more information). However, under certain circumstances it may be necessary to hire temporary personnel on a contract basis for a specified period of time in order to complete a particular project. Such contract workers, whose terms of employment must undergo an IRS classification analysis, are not employees of the Institute. They are paid for the time they work, as specified by their contract, but are not entitled to other benefits of employment.

It is essential that workers be properly classified as either employees or contractors, and that the classification be substantiated by documentation. The federal Internal Revenue Code, as well as other federal and state laws, governs the designation of a worker as an employee or a contractor. If an employee is misclassified as a contractor, the Institute may be subjected to significant tax penalties and other liabilities. Please see the Classification of Temporary Workers policy for more information.

Each classification must be determined *prior to* the time when the individual begins work. This determination will be made in consultation with the Comptroller's Office and/or the Human Resources Office. Contractors must enter into independent contractor agreements with the Institute prior to performing any services.

Individuals receiving payments such as honorariums, prizes, awards, and postdoctoral fellowship stipends do not need to undergo the IRS classification analysis. Processing of these types of payments is governed by the Business Office.

All requests for temporary help should be reviewed in advance by Human Resources or the Business Office, according to Institute guidelines. All contractors engaged by the Institute are subject to the same background verifications as regular, active employees of the Institute. Contractors, unlike employees, are paid through the Accounts Payable office after the contracted work is completed or approved, according to their specific agreement. Payments to legal aliens are processed according to federal law.

Supervisors who have questions or need guidance about this process should contact the Business Office or the Manager of Human Resources.

*Regular employees are defined as those in established positions of the Institute with no time limit placed on the term of their employment and who are eligible for benefits based on their full-time (35 to 40 hours per week) or part-time (25 to 34 hours per week) schedule.

Interviewing and/or Hiring of Relatives

The Institute maintains a non-discriminatory policy in all hiring practices and seeks to employ the most qualified individual in each post.

There are occasions when a qualified candidate for a position is related (by birth, domestic partnership, marriage, or other comparable personal relationship) to a current member of the Faculty, or to Staff or a Visiting Scholar (Member or Visitor). Although there is an Institute policy prohibiting relatives from working in positions as supervisor and supervisee, there is no broader prohibition of the hiring of relatives of current Institute-affiliated individuals.

In certain, very limited cases, personal relationships may be considered if one of the positions involves having access to information of a highly sensitive nature (such as, but not necessarily limited to, certain positions in the Human Resources or the Business Office) as determined by the Office of Human Resources. Except for these situations, and the supervisor/supervisee prohibition, personal relationships should not be considered when making appointments.

Supervisors' Responsibilities

In general, anyone who supervises other employees has a responsibility to uphold and fairly apply all Institute policies and procedures, as well as all legal requirements. While it is impractical to provide an exhaustive list of job-specific expectations, the following list includes responsibilities that are generally expected of all supervisors:

- Demonstrate ethical standards of behavior and create an atmosphere in which diversity is accepted and all employees are treated fairly and consistently
- Ensure that employees understand what is expected of them and explain to them how to carry out their duties
- Recognize good performance, address inadequate performance, and take corrective action when necessary
- Remain current on Institute policies, procedures and news in order to inform and update employees

To be successful, supervisors should be familiar with Institute resources designed to assist with these duties. The Employee Handbook as well as this guide provide useful and basic information for supervisors and Staff. For additional assistance or information, contact the Manager of Human Resources.

Work Boundaries for Support Staff

While individual Schools may have work rules appropriate to the needs and practices of their disciplines, some general guidelines on which types of work are appropriate for the support of Faculty, Emeritus Faculty and Members have been established in consultation with the Schools.

Work requests that relate specifically to office tasks that facilitate the academic work of the Faculty, Emeritus Faculty, or Members are appropriate. Some examples of such tasks are: making travel arrangements for travel for academic purposes (including investigating rates, obtaining visas, booking hotels, car rentals, etc.); preparing papers and letters; and managing professional correspondence.

However, support Staff of the Institute, including Academic Assistants, should not be asked to perform work of a personal nature in the course of their Institute work. Some examples of personal work are: personally providing transportation to or from train stations for the faculty member or others; collecting mail from a faculty home while the faculty member is traveling; acting as a primary contact for a faculty member's house alarm de-activation; and preparing paperwork for personal banking transactions.

Similar to other Institute policies, the *Work Boundaries for Support Staff* guidelines should be reviewed by the School Administrative Officers at minimum on an annual basis, and they should feel free to discuss any suggested revisions with the Manager of Human Resources. The School Administrative Officers should also give each Faculty and Emeritus Faculty member the periodic opportunity to review the work instructions for their Academic Assistant in accordance with their required level of support.

The Institute does have a separate policy on *Consulting and Other Work Performed by Staff for Other Members of the Institute Community* that describes the boundaries to be observed when a member of the Institute community hires a member of the Institute Staff to perform personal work, such as, for example, lawn mowing, carpentry for one's home, or babysitting. Before hiring an Institute Staff member for personal work, the Institute encourages individuals to consider possible issues that might arise if there is a direct reporting relationship between the individuals.

Purchasing

The Purchasing Department is responsible for procuring equipment, goods and services for the Institute at the most competitive rates available. All purchases from sources outside the Institute should be coordinated with the Purchasing Department. In general, Staff and faculty should only contact outside vendors to discuss technical support or product specifications. Exceptions to this rule include food purchases by our dining department, book purchases by our libraries, and computer software and licensing purchases authorized by the Institute Computing Manager.

The Purchasing Staff will reach agreements with vendors concerning price, delivery, quantity, quality, and all other matters that belong in a purchasing agreement. Purchases related to government grants must comply with the grant guidelines and any relevant statutes, regulations or policy statements. Accordingly, requisitions for grant-related products or services should also be referred to Purchasing in order to make use of the Department's expertise.

Faculty members and departmental supervisors have authority to submit purchase requisitions. Each department head should notify the Purchasing Department and the Comptroller of other designated Staff members who also have signature authority to submit purchase requisitions. Capital purchases above a specified dollar limit may require approval by the Associate Director for Finance and Administration. In instances where Staff or faculty work directly with a vendor to procure goods or services, that Staff or faculty member is responsible for reviewing and monitoring the relationship with this vendor to ensure that the Institute's standards are being met (i.e., competitive bidding, fair and ethical negotiations, etc.).

Persons engaged in procurement, whether or not they are members of the Purchasing Department, may not accept gifts or gratuities from vendors, and must avoid conflicts of interest. (For more information see the policies on Standards of Personal Conduct, Conflicts of Interest and Gifts and Gratuities.) Institute policy prohibits the purchase of any equipment, good or service through the Purchasing Department for the personal use of any member of the Institute, faculty, Staff, or faculty or Staff member's family.

Travel Expenses

Business travel expenses that are identified in advance, such as airfare or registration fees, can be paid directly by the Institute and charged to the appropriate expense account. Invoices for such items should be forwarded to the Business Office for processing.

To request reimbursement of out-of-pocket travel expenses, a travel voucher with supporting documentation and original receipts should be forwarded to the Comptroller within one month of return. The travel voucher is available from the Business Office website:

["Request for Travel Reimbursement"](#) The dates and purpose of travel should be noted clearly on the voucher. A record of expenses incurred by the individual while traveling should be maintained and documented by original receipts. Current exchange rates for foreign denominations can be obtained from the Classic 164 Currency Converter <http://www.oanda.com/converter/classic> .

Mileage for use of one's personal vehicle will be reimbursed at the current government approved rate. Mileage is calculated from one's place of business to the destination. Mileage from home is considered commuting and is not reimbursable. The current mileage rate is available at the U.S. General Services Administration website,

<http://www.gsa.gov/portal/content/100715>

Gratuities may be included in the amount shown for applicable expenses such as meals, taxi service, etc. The gratuity should be limited to the generally accepted norm of 15% unless the expense is incurred in a country where local practices are not consistent with this guideline. Tips for skycaps, bellhops, and porters are generally limited to US \$1.00 per bag.

Travel costs for meals and hotel can only be reimbursed for those expenses incurred during the period of the conference/meeting. If a trip includes additional working days before or after the conference/meeting, these days must be charged to an employee's Paid Time Off.

Domestic air travel including Canada and Mexico may be in coach or business class. International travel, when actual flying time excluding stop-over is under 10 hours, may be in coach or business class. International travel, when actual flying time excluding stop-over is over 10 hours, may be in business or first class.

If a spouse or companion elects to accompany the employee on a research/business trip, the additional expenses incurred are considered personal expenses.

Per diem rates may be used for reimbursement in lieu of the itemization method described above. Government sanctioned per diem subsistence rates are available on the U.S. Treasury

website. Per diem rates for travel within the Continental United States may be obtained at the U.S. General Services Administration website,

<http://www.gsa.gov/portal/content/104877>

Foreign per diem rates may be obtained at the U.S. Department of State

(http://aoprals.state.gov/content.asp?content_id=184&menu_id=78)

Consulting and Other Work Performed by Staff for Other Members of the Institute Community

The Institute recognizes that its Staff members have skills and talents that may be valuable to Institute community members outside their own departments. Applying such skills and talents can benefit not only the individual Staff member, both financially and by improving their skills, but also the Institute through the sharing of needed talents and by increasing internal collaborations.

Staff members who engage in work for other individuals affiliated with the Institute must ensure that these activities occur outside their normal work hours and do not interfere with their primary duties or work schedule. Moreover, such Staff members must ensure that any activities outside their normal duties do not conflict or appear to conflict with the interests of the Institute. If a Staff member wishes to engage in such after hour activities, he or she should disclose the intended relationship with his/her supervisor prior to participating in any such activities. For additional guidance please see the Conflict of Interest policy.

Work engagements which are performed outside of normal and defined Institute-compensated time are strictly between the individual employee and the outside entity. The Institute will not participate in arrangements of transactions or disputes of any transactions.

If you have any questions or need additional guidance on this policy, contact the Manager of Human Resources.

Use of Institute Resources

Institute resources are defined as items of Institute property that are used for Institute purposes, such as its facilities, equipment, telecommunications, technology, electronic systems, vehicles, postage, and other tangible assets. The Institute expects that reasonable care be taken when using IAS resources, and that they not be altered or intentionally damaged.

Occasionally it is necessary for Institute personnel to monitor or gain access to some of these resources, as in cases of employee absence, emergency, equipment maintenance or upgrade, or because of security concerns. Institute community members are encouraged not to use Institute equipment to store or send sensitive personal information.

In general, members of the Institute may not use Institute resources to carry out private business or activities for their personal financial benefit. On occasion, incidental personal use of equipment may be permitted on a limited basis provided such use does not impact negatively the work of the office or the department. (For more detailed information on the use of Institute technology, see the Computer Use Guidelines in the Employee Handbook and the Computer Use Guidelines on the Institute web page.)

The Institute's logo, seal, name or endorsement may be used only with the prior consent of the Director or the Associate Director for Finance and Administration. The Institute considers all non-public information as proprietary and as such, expects it to remain confidential.

Supervisors are responsible for ensuring that Institute community members understand and adhere to this policy.

Use of Institute Facilities by Individuals or External Organizations

In certain circumstances, some of the common areas of the Institute may be rented by individuals or external organizations for private gatherings.

The following rooms and venues may in certain circumstances be hired for use by individuals and external organizations: (a) Dining Hall, Dilworth Room, Marquand House, areas in the Institute grounds (e.g. pond area); (b) Wolfensohn Hall; (c) Fuld Hall Common Room, West Building Lecture Room, White/Levy Room, Simonyi Hall Lecture Room, Bloomberg Hall Lecture Room; (d) West Building Seminar Room.

With the exception of Wolfensohn Hall, the period of hire must be on a Saturday or Sunday if in the months of September to June. In the case of Wolfensohn Hall, events taking place in the evening will be considered on any day of the week. Events taking place on any day of the week in any of the locations listed will be considered during July and August.

Applications for hire may be made by employees of the Institute (Staff and Faculty), Members of the Institute (during the period of their Membership), Emeritus Faculty, Trustees, Emeritus Trustees, and surviving spouse and partners of deceased Faculty and Emeritus Faculty, for personal use or for use by an external organization of which the applicant is a member. Additionally, applications for personal use of Marquand House may also be made by past employees who have at least 20 years' service for the Institute, and members of the Founder's, Director's and Chairman's circles of the Friends of the Institute.

Applications should be made in writing to the Director. Where an application is made by a Member or on behalf of an organization whose activities relate to one of the Schools, The Director will consult the relevant School before deciding whether to grant the application. In deciding whether to grant an application, the Director will have regard to the nature and purpose of the event for which the application is made, the level of commitments already made and the need to preserve the tranquil working atmosphere of the Institute. The Director will consult the Executive Officers of the relevant Schools through the Administrative Officers before granting applications for use of rooms in Bloomberg Hall (Natural Sciences), Simonyi Hall (Mathematics), and the West Building (Historical Studies and Social Science). Bookings under this policy should be regarded as provisional until about nine months before the event in case the Institute needs the facility itself. (December 31 for the following September to December; March 31 for the following January to April; and June 30 for the following May to August.)

Applications for personal use will be granted for weddings, birthdays, and Bar and Bat Mitzvahs of the immediate family members of the applicant, provided that the level of commitments already made is not too large. Applications made on behalf of external bodies will be granted only if the purpose of the event is broadly educational or cultural and if it is not for profit. An application will not be granted if it seems possible that there might be conflict between the purpose of the event and the interests of the Institute.

The charges for hire for the various categories listed above are: (a) \$3.00 per guest; (b) \$250; (c) \$125; (d) \$50. Additionally there will be charge of \$50 per Staff member per hour for maintenance and custodial services including setting up and cleaning up. There will be further charges for the repair of any damage. Any caterers or other vendors to be used must be approved by the Institute. The host and vendors must provide certificates of insurance naming the Institute as certificate holder. All ordinances of Princeton Township, including those relating to noise, must be complied with.

Return of Institute Property Upon Termination

To ensure that Institute property is retained and security is preserved, all separating Staff employees or departing Institute community members are responsible for returning all property in their possession to their immediate supervisor, the School Administrative Officer, or the Manager of Human Resources. Such property includes, but is not limited to, keys, identification cards (for both community members and family members), calling cards, uniforms, computers, tools, and other Institute resources. Library materials must be returned directly to the library.

The Institute must ensure that intellectual property is secure and that technology systems are not compromised. Therefore, upon leaving the Institute, community members will no longer have access to the Institute's computer systems, e-mail accounts, voicemail accounts, or other protected technology systems. Each school is responsible for determining the appropriate level of access permitted to these systems by former Members. Supervisors should notify appropriate computing personnel to suspend all passwords and other authorizations for a user leaving the Institute.

In some cases, such as retirement of employees, exceptions to these guidelines may be granted.

Standards of Personal Conduct

The good name and reputation of the Institute is maintained by the actions of each member of the Institute community. In that spirit, this policy is a shared statement of our commitment to upholding the ethical, professional and legal standards we use as the basis for our daily and long-term decisions and actions. We all must be cognizant of and comply with the policies, standards, laws and regulations that apply to our work environment. We are each individually accountable for our own actions and, as members of the Institute community, are collectively accountable for upholding these standards of behavior and for compliance with all applicable laws and policies.

Accordingly, each member should uphold the highest standards of ethical personal conduct. Whether employees are at work on the Institute's property or off-site representing the Institute, they should demonstrate good judgment and proper respect for the rights of others and the law in every aspect of conducting their duties. Additionally, discretion is important in one's work, and Institute employees should not disclose nonpublic information such as confidential or private personal information that becomes known to them in the course of their work.

Although the personal conduct of Institute community members is self-regulated, individuals should be sensitive to situations that may raise questions or the appearance of impropriety. The Institute reserves the right to take the appropriate disciplinary action, up to and including termination of employment, against any individual whose professional or personal conduct falls outside the parameters of good judgment, integrity, or the law, regardless of where such violations occurred. Adherence to this policy also makes us responsible for bringing suspected violations of applicable standards, policies, laws or regulations to the attention of the Institute. Raising such concerns is a service to the Institute and does not jeopardize one's position or employment.

It is the Institute's intent to have as few rules and regulations regarding conduct as possible. Individual departments, however, may create specific work rules tailored to their own areas of concern. Similarly, certain Institute policies have been created to inform the community on appropriate behavior with regard to work schedules, the use of alcohol and controlled substances, and other matters. Other policies explicitly forbid harassment and conflicts of interest. Please see the appropriate policies for more information on these and other specific topics.

Personal Relationships in the Workplace

Perspective on Personal Relationships

The Institute, like other employers, has adopted guidelines designed to ensure that personal relationships do not lead to real or perceived conflicts of interest or favoritism. Personal relationships include, but are not limited to, immediate family members, domestic partners, and members of the same household. Employees who share a personal relationship may work at the Institute, even in the same department, as long as one employee does not have the ability to influence or control the other's terms and conditions of employment. Terms and conditions of employment include, but are not limited to, hiring, promotions, retention, job classification, salary, performance appraisals, work assignments, and leaves of absence.

Although the Institute does not attempt to prohibit romantic or sexual relationships between Institute community members, such relationships are not encouraged, and it is strongly suggested that the potential impact of such relationships on the work environment be considered carefully. Such relationships can readily create a conflict of interest, or the appearance of a conflict, and/or lead to charges of harassment or discrimination that expose both the Institute and the persons involved to legal proceedings. If any such charges are filed, the Institute is obligated to investigate them in accordance with its Harassment Policy and Grievance Procedure.

Supervisors and Potential Conflicts of Interest

If a personal relationship exists or develops between a supervisor and someone s/he supervises, certain more stringent safeguards, described below, need to be followed. These steps are necessary because a conflict of interest, or the perception of a conflict of interest, may be created when a supervisor directly or indirectly affects employment-related decisions -- e.g., evaluates performance or determines the compensation of an employee with whom s/he has or has had a personal relationship. Employees concerned about the impact of the personal relationship of co-workers on their own work environment are encouraged to speak with their supervisor or with the Manager of Human Resources.

Any supervisor who has or has had a personal relationship with an employee who reports to him/her must discuss the issue with the Associate Director for Finance and Administration or the Manager of Human Resources. The discussion will be kept confidential, within the larger need to deal with the situation appropriately. The goal of the Associate Director for Finance and Administration or the Manager of Human Resources is to help resolve any problems as fairly and discreetly as possible.

If a personal relationship has led to a conflict of interest, favoritism, harassment, or other negative impact on the Institute community, the following options will be considered and may be taken, depending on the circumstances of the case:

- The supervisor may be removed from any evaluative role in employment decisions that affect the employee.

- The supervisor may be subjected to corrective action if s/he does not bring the relationship to the attention of the Associate Director for Finance and Administration and Comptroller or the Manager of Human Resources.
- The supervised employee may be transferred or other appropriate action may be taken.

This policy prevails at all levels of supervision. For clarification or additional information about this policy, contact the Manager of Human Resources. All conversations will be held in confidence to the fullest extent that is possible.

Conflicts of Interest and Outside Activities

Institute community members have the responsibility to protect the Institute from conflicts of interest or the appearance of conflicts of interest. A conflict of interest may arise if an individual's personal interests interfere with their professional relationship with and obligations to the Institute. Conflicts of interest can also arise if an Institute community member interacts inappropriately with other members or uses his/her status at the Institute for inappropriate purposes. (For more information, see the Institute's policies governing Harassment, Personal Relationships in the Workplace, and Consulting and Work Performed by Staff for Other Members of the Institute Community.)

The concept of conflict of interest is complex and every potential situation cannot be addressed in a single policy; however, it is useful to establish general guidelines. Generally stated, Institute community members are obligated to act with integrity and exercise good judgment in all of their activities and to be sensitive to situations that may be actual conflicts or create an appearance of a conflict of interest. Similarly, Institute community members must avoid situations that benefit, or appear to benefit, themselves or their families rather than the Institute. Institute resources, facilities, equipment and information may not be used to further an Institute community member's involvement in outside activities.

Although every kind of conduct that could lead to a conflict of interest cannot be included here, the following examples may be helpful:

- Outside employment or consulting during Institute work time
- Significant financial interest in business concerns that are vendors to the Institute
- Accepting gifts from vendors or other business concerns
- Hiring members of one's family on an employment or contract basis
- Professional associations and civic activities that might conflict with the Institute's mission
- Inappropriate use of the Institute's name
- Exploitation of one's association with the Institute for private gain

Institute community members who are concerned that some activity or conduct may conflict with this policy should speak with their supervisor or the Manager of Human Resources *prior to* engaging in that activity or conduct. Actions that contradict this policy may subject individuals to disciplinary procedures. Where government funds are involved, a conflict of interest may also result in civil and/or criminal penalties.

Outside Employment

Consistent with this policy, Staff members may not take on additional work for themselves or any third party during work hours. Additional work that is performed outside normal working hours should not be competitive with or detrimental to the Institute's best interests. Employees considering additional employment should speak with their supervisors about the nature of the work, the commitment that would be required, and other relevant details. If it is determined that this work would create, or has the potential to create, a conflict of interest, the request will not be approved. Any employee who takes additional employment against the wishes of the Institute will be subject to Institute action, up to and including dismissal.

Professional Associations and Voluntary Activities

The Institute recognizes the importance of participating in (1) professional associations and societies that align with career interests and (2) certain voluntary civic and community activities. Even so, such activities may raise actual and/or perceived conflicts of interests in terms of time commitment and other employment obligations. Institute community members must remember that during working hours, their primary commitment is to the Institute, and they should not allow outside activities to interfere with this commitment. Institute community members should establish clear boundaries to separate outside activities from Institute commitments.

Confidential Information

Employees in certain offices or departments may have access to confidential and/or proprietary information as part of their responsibilities. Such information must be treated with care inside the Institute and with strict confidence outside the Institute. Confidential information or knowledge must not be disclosed to other employees (unless there is a recognized business need), third parties, family members, colleagues, or friends; this obligation continues after an employee has left their employment with the Institute. Employees who disclose confidential information without clear need and prior consent or in any way violate this policy will be subject to disciplinary action.

Gifts and Gratuities

The Institute has a policy that forbids Institute community members from soliciting or accepting gifts, gratuities, or special favors of any kind from outside vendors, contractors or companies with whom they do business on behalf of the Institute. The Institute has adopted this policy to ensure that vendors, contractors and other business associates are selected fairly and engaged only for appropriate business reasons. Accepting gifts and gratuities would tarnish a business relationship and cause the appearance of favoritism or conflict of interest. (For more information about this topic, see Conflicts of Interest in this manual.)

Gifts and gratuities may include, but are not limited to:

- Cash rebates to an individual making a purchase on behalf of the Institute
- Free tickets to a sporting, cultural or entertainment event
- Personal discounts
- Personal commissions
- Tangible items of value (such as liquor, securities, real estate, etc.)

An occasional, nominal business courtesy, such as a lunch, dinner, or promotional item provided by a vendor, contractor or outside company, is acceptable under this policy. Gifts, gratuities or favors valued in excess of \$25, however, are not acceptable, nor is a cash distribution of any amount. If the value of a gift is undetermined, it should by default be considered unacceptable. If a community member receives a gift or gratuity, he or she should notify the supervisor or the Associate Director for Finance and Administration and Comptroller and return the gift to the donor. The donor may also be advised that it is acceptable to credit the Institute's account as an alternative to giving a personal gift or reward.

All supervisors are responsible for ensuring that employees are aware of and adhere to this policy. Each Institute community member interacting with third parties is responsible for informing them of this policy.

Solicitations

In order to reduce distractions and enhance the working environment, solicitations for any purpose are restricted to non-working hours. The distribution of invitations, handbills, advertisements, or other written materials, whether in printed or electronic form, by interoffice mail or by utilizing Institute e-mail addresses, is prohibited. Distribution of written solicitations by non-community members is forbidden on any Institute property. Exceptions for charitable organizations and Institute-sponsored events may be made, at the discretion of the Institute, but even such approved activities are best limited to non-working hours.

Supervisors should ensure that Staff members understand the content and purpose of this policy.