

I. INTRODUCTION

The University of Denver expects the highest standards of conduct and honesty from all of its University Representatives. University Representatives must fulfill their institutional responsibilities with care and loyalty and must avoid involvement in activities that conflict with, or appear to conflict with, those responsibilities. The term “University Representatives” includes trustees, officers, faculty members, and employees of the University of Denver.

II. POLICY OVERVIEW

A. General Rule

University Representatives should use good judgment and professional commitment to protect themselves and the University from conflicts of interest. This includes avoiding situations or activities that could interfere with a University Representative’s unfettered exercise of judgment in the best interests of the University. University Representatives should make decisions and take actions on behalf of the University for the sole purpose of advancing the best interests of the University. While the University encourages participation in professional, community service, and other external activities, University Representatives must avoid ethical, legal, and financial conflicts of interest arising out of those activities that may compromise their effectiveness in carrying out their University responsibilities.¹

¹ See also University Policy FINA 3.20.070 - *Code of Business Conduct*, Section G, page 3 of 5: “University Personnel are responsible for performing their duties in good faith and in the best

Senior Vice Chancellors, Vice Chancellors, Deans, Officers, and the equivalent;

Directors (Director 1, 2, and 3 HR Position Titles);

Academic Department Chairs;

Head coaches and assistant coaches of University athletics programs;
and

All persons not appearing on the above list who are required to complete an Annual Sub-Certification Disclosure by University Policy FINA 2.10.070 - *Corporate Governance and Responsibility*.

University Representatives receiving the questionnaire have a responsibility to answer questions thoroughly and to the best of their abilities. If a University Representative becomes aware of a material change in circumstances concerning a previously-submitted disclosure, the University Representative must promptly provide amended information to the Office of Enterprise Risk Management, using the

