

1 **GEORGIA STATE UNIVERSITY FOUNDATION, INC.**

2
3 Policy number/name: 1.4 Code of Conduct Policy

4
5 Issuing date: June 10, 2009 Effective date: June 10, 2009

6
7 Policy approved by: Board of Trustees

8
9 Governance oversight by: Audit Committee

10
11 **I. Revision history**

12
13 This is the initial version of the policy.

14
15 **II. Purpose of the policy/Policy statement**

16
17 Georgia State University Foundation is committed to the highest ethical and professional
18 standards of conduct for university related foundations. This Code of Conduct Policy serves as
19 a guide for the Foundation trustees, staff, and volunteers in carrying out their duties and
20 responsibilities on behalf of the Georgia State University Foundation.

21
22 **III. Definitions**

23
24 Staff - Staff members employed by Georgia State University assigned to and working on behalf
25 of Georgia State University Foundation as well as any individuals members working directly
26 for Georgia State University Foundation.

27
28 Individuals - all members of the Georgia State University Foundation community who may
29 work or volunteer on behalf of the Foundation in the conduct of its professional purpose.

30
31 **IV. Applicability**

32
33 To all trustees, directors, staff or volunteers conducting business on behalf of the Georgia State
34 University Foundation.

35
36 **V. Exceptions**

37
38 None known

39
40 **VI. Detailed policy statement**

41
42 Georgia State University Foundation and its trustees, directors, staff, and volunteers must, at all
43 times, comply with all applicable laws and regulations in carrying out their duties on behalf of
44 the Foundation. The Georgia State University Foundation will not condone the activities of
45 individuals who achieve results through violation of the law or unethical business dealings.

46 This includes any payments for illegal acts, indirect contributions, rebates, and bribery. The
47 Georgia State University Foundation does not permit any activity that fails to stand the closest
48 possible public scrutiny.

49
50 All business conduct should be well above the minimum standards required by law.
51 Accordingly, individuals must ensure that their actions cannot be interpreted as being, in
52 any way, in contravention of the laws and regulations governing the Georgia State University
53 Foundation's operations.

54
55 Individuals who are uncertain about the application or interpretation of any legal requirements
56 should refer the matter to their supervisor or the office of the Vice President of Development,
57 who, if necessary, should seek appropriate legal advice.

58
59 **A. General Conduct:**

60 The Georgia State University Foundation expects individuals acting on its behalf to
61 conduct themselves in a business-like manner. Gambling, fighting, swearing, and
62 similar unprofessional activities are strictly prohibited while on the job.

63
64 Individual must not engage in sexual harassment, or conduct themselves in a way that
65 could be construed as such, for example, by using inappropriate language, keeping or
66 posting inappropriate materials in their work area, or accessing inappropriate materials
67 on their computer. Violations may result in disciplinary action up to and including
68 termination.

69
70 **B. Conflicts of Interest:**

71 The Georgia State University Foundation expects that individual will perform their
72 duties conscientiously, honestly, and in accordance with the best interests of the
73 Georgia State University Foundation. Individual must not use their positions or the
74 knowledge gained as a result of their positions for private or personal advantage.
75 Regardless of the circumstances, if individual members sense that a course of action they
76 have pursued, or are presently pursuing, or are contemplating pursuing may involve
77 them in a conflict of interest with the Foundation, they should immediately
78 communicate all the facts to their supervisor or higher authority.

79
80 **C. Outside Activities, Employment, and Directorships:**

81 All individual members of the GSUF community share a serious responsibility for the
82 Georgia State University Foundation's good public relations, especially at the
83 community level. Their readiness to help with religious, charitable, educational, and
84 civic activities brings credit to the Georgia State University Foundation and is
85 encouraged. Individuals must, however, avoid acquiring any business interest or
86 participating in any other activity outside the Georgia State University Foundation
87 that would, or would appear to:

- 88 • Create an excessive demand upon their time and attention, thus depriving the
89 Georgia State University Foundation of their best efforts on the job.
- 90 • Create a conflict of interest - an obligation, interest, or distraction - that may
91 interfere with the independent exercise of judgment in the Georgia State
92 University Foundation's best interest.

93
94
95
96
97
98
99
100
101
102
103
104
105
106
107
108
109
110
111
112
113
114
115
116
117
118
119
120
121
122
123
124
125
126
127
128
129
130
131
132
133
134
135
136
137
138
139

D. Relationships with Clients and Suppliers:

Individuals should avoid investing in or acquiring a financial interest for their own personal accounts in any business Georgia State University Foundation that has a contractual relationship with the Georgia State University Foundation, or that provides goods or services, or both, to the Georgia State University Foundation if such investment or interest could influence or create the impression of influencing their decisions in the performance of their duties on behalf of the Georgia State University Foundation.

E. Gifts, Entertainment, and Favors:

Individuals must not accept entertainment, gifts, or personal favors that could, in any way, influence, or appear to influence, business decisions in favor of any person or Georgia State University Foundation with whom or with which the Georgia State University Foundation has, or is likely to have, business dealings. Similarly, individuals must not accept any other preferential treatment under these circumstances because their positions with the Georgia State University Foundation might be inclined to, or be perceived to, place them under obligation to return the preferential treatment.

F. Kickbacks and Secret Commissions:

Regarding the Georgia State University Foundation’s business activities, individuals may not receive payment or compensation of any kind, except as authorized under the Georgia State University Foundation’s and Georgia State University business and payroll policies. In particular, the Georgia State University Foundation strictly prohibits the acceptance of kickbacks and secret commissions from suppliers or others.

G. Funds and Other Assets:

Individual members who have access to Georgia State University Foundation funds in any form must follow the prescribed procedures for recording, handling, and protecting money as detailed in the Georgia State University Foundation’s policies and procedures or other explanatory materials, or both.

Foundation maintains and regularly evaluates internal controls to prevent fraud and dishonesty. If individuals become aware of any evidence of fraud and dishonesty, they should immediately advise their supervisor or higher authority or file a report utilizing the anonymous reporting hotline as described in the foundation’s whistle blower policy so that the Georgia State University Foundation can promptly investigate further.

<http://www.tnwinc.com/GASTATE/>

When an individual’s position requires spending funds or incurring any reimbursable personal expenses, that individual must use good judgment on the Foundation’s behalf to ensure that good value is received for expenditures, and an appropriate business purpose exists. Expenditures must be in compliance with Foundation Policies as well as the State of Georgia Procurement policy and not for personal benefit. This includes the personal use of Georgia State University Foundational assets, such as computers.

140
141
142
143
144
145
146
147
148
149
150
151
152
153
154
155
156
157
158
159
160
161
162
163
164
165
166
167
168
169
170
171
172
173
174
175
176
177
178
179
180
181
182
183
184
185
186

H. Records and Communications:

Accurate and reliable records of many kinds are necessary to meet the Georgia State University Foundation’s legal and financial obligations and to manage the affairs of the Georgia State University Foundation. The Georgia State University Foundation’s books and records must reflect in an accurate and timely manner, all business transactions. The individuals responsible for accounting and recordkeeping must fully disclose and record all assets, liabilities, or both, and must exercise diligence in enforcing these requirements. Individuals must not make or engage in any false record or communication of any kind, whether internal or external, including but not limited to:

- False expense, attendance, production, financial, or similar reports and statements
- False advertising, deceptive marketing practices, or other misleading representations

Individuals should refer to the Records Retention Policy, number 4.1, for guidance on specific time frames for maintaining business documents.

I. Communicating With External Parties:

Individuals must take care to separate their personal roles from their Georgia State University Foundation positions when communicating on matters not involving Georgia State University Foundation business. Individuals must not use Georgia State University Foundation identification, stationery, supplies, and equipment for personal or political matters. When communicating publicly on matters that involve Georgia State University Foundation business, individuals must not presume to speak for the Georgia State University Foundation on any topic, unless they are certain that the views they express are those of the Georgia State University Foundation, and it is the Georgia State University Foundation’s desire that such views be publicly disseminated.

When dealing with anyone outside the Georgia State University Foundation, including public officials, individuals must take care not to compromise the integrity or damage the reputation of either the Georgia State University Foundation, or any outside individual, business, or government body.

J. Prompt Communications:

In all matters relevant to donor, customers, suppliers, government authorities, the public and others in the Georgia State University Foundation, all individuals must make every effort to achieve complete, accurate, and timely communications - responding promptly and courteously to all proper requests for information and to all complaints.

K. Privacy and Confidentiality:

When handling financial and personal information about donors or others with whom the Georgia State University Foundation has dealings, observe the following principles:

- Collect, use, and retain only the personal information necessary for the Georgia State University Foundation’s business. Whenever possible, obtain any relevant information directly from the person concerned. Use only reputable and reliable sources to supplement this information.
- Retain information only for as long as necessary or as required by law. Protect the physical security of this information.

- 187
- 188
- 189
- 190
- 191
- 192
- Limit internal access to personal information to those with a legitimate business reason for seeking that information. Use only personal information for the purposes for which it was originally obtained. Obtain the consent of the person concerned before externally disclosing any personal information, unless legal process or contractual obligation provides otherwise.

193 The aforementioned listing of inappropriate behaviors is in no way exhaustive and each

194 individual must be responsible for their own behavior. Common sense, good judgment,

195 cooperation, and appropriate personal behavior are essentially the responsibility of every

196 member of the Foundation community. Individuals participating in inappropriate conduct will

197 be subject to disciplinary action including termination.

198

199

200 **HELP**

201

202 **People to contact**

203 Position Title	Campus Location	Phone Number	Email Address
204 CFO	1Park Place Suite 533	404-413-3434	findap@langate.gsu.edu
205 Controller	1Park Place Suite 533	404-413-3485	finaac@langate.gsu.edu

206 **Additional information and helpful resources**

207

208 **Policies:**

209 4.1 Records Retention Policy

210 4.2 Conflict of Interest Policy

211 4.3 Whistle Blower (Anonymous Reporting) Policy

212

213