

December 2009

To: Staff and Faculty Colleagues

From: James W. Wagner, President

Attached please find Emory University's [Code of Business Ethics and Conduct](#), a policy that is vital to the success and well-being of this institution, and one that federal regulations call for us to distribute.

My administrative colleagues and I ask that you read this code carefully, thinking about its meaning beyond the letter of the law, and considering Emory's guiding ethical principles and deep commitment to doing what is right.

Great thanks for your good work on behalf of the University. This comes with all best wishes for the holiday season.



Policy 7.20

Code of Business Ethics and Conduct

Responsible Official: VP for Research Administration

Administering Division/Department: Research Compliance

Effective Date: February 01, 2009

Last Revision: November 18, 2009

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Overview

The purpose of this Code of Business Ethics and Conduct Policy ("Policy") is to ensure that employees to whom this Policy applies operate in accordance with all applicable U.S. laws and regulations in carrying out all of their job responsibilities, and in particular any responsibilities they have in connection with Federal Research/Contract Activities. This policy consolidates requirements set forth in separate policies cited as links within the Policy Details of this document.

Applicability

This Policy applies to all employees of Emory University.

Policy Details

A. Overarching Statement of Ethical Principles: Emory University has adopted an overarching [Guiding Ethical Principles](#) that applies to Emory employees and all other members of the Emory Community. Emory employees should strive to adhere to these principles in carrying out their job responsibilities, and in particular any responsibilities they have in connection with Federal Research/Contract Activities. [Statement of](#)

B. Applicable Policy Requirements: Emory University has adopted University-wide standards and policies that govern employees' activities while performing services for or on behalf of Emory University. Emory University employees are expected to abide by and conform to all applicable University standards and policies. These standards and policies apply to all job activities, including, but not limited to Federal Research/Contract Activities. In performing job activities, employees should:

- (1) Conduct such activities in accordance with the Standards of Conduct set forth in Emory University [Human Resources Policy 4.62](#).
- (2) Avoid any conflict of interest in any business or financial relationship or transaction as set forth in Emory University [Human Resources Policy 4.87](#) and in [Research Policy 7.7](#), Policy for Researchers Holding Financial Interest in Sponsored Program.
- (3) Adhere to the standards of conduct and requirements found in Emory's Substance Abuse/Drug-Free Workplace [Human Resources Policy 4.66](#).
- (4) Report any theft or other criminal incidents in accordance with Emory University [Human Resources Policy 4.68](#). [Human](#)

(5) Report any evidence of misconduct in research or violations of research-related policies and regulations in accordance with Emory's Policy on Research Misconduct, Research Policy 7.8.

C. Reporting Suspected Violations: Emory employees should report any suspected violations or questionable matters concerning conflicts-of-interest; fraud; embezzlement; non-compliance with research or HIPAA policies/regulations; financial or billing matters non-compliance; research misconduct; theft; or Emory policy violations, including but not limited to violations of this policy in one of the following ways:

- (1) By talking directly with the employee's manager or any Emory senior administrator.
- (2) By contacting the Emory Internal Audit Division, the Emory Healthcare Compliance Office or the Emory Research Compliance Office at the phone numbers below:
 - i. Emory Internal Audit Division – 404-727-6146
 - ii. Emory Healthcare Compliance Office – 404-778-2757
 - iii. Emory Research Compliance Office – 404-727-2398
- (3) By anonymously reporting the matter through the Emory Trust Line at 1-888-550-8850. The Emory Trust Line is a toll-free, 24 hour/seven days per week, telephone hotline service that is administered by an independent company. Emory employees may use the Trust Line to report their concerns confidentially. The anonymity of persons making reports to the Trust Line shall be preserved to the extent possible. More information regarding the Trust Line and Trust Line training materials can be found at <https://www.finadmin.emory.edu/internalaudit/trustline.html>

D. Procedure for Investigating Suspected Violations:

- (1) Emory supervisors and administrators who receive reports of allegations shall contact the appropriate Emory unit responsible for the subject matter area of the underlying report, which unit shall then review the allegations and conduct any necessary inquiry.
- (2) For reports made through the Emory Trust Line, the Trust Line administrator shall within 24 hours (or possibly sooner, depending upon the level of urgency associated with the call) provide a detailed written report of the allegations to an Emory contact person in the Emory Internal Audit Division or the Emory Healthcare Compliance Office. These units, in turn, will triage the report and contact the specific departments/units involved to conduct an appropriate inquiry. The results of the inquiry will be provided to the Trust Line administrator, who will then communicate with the reporter.
- (3) Depending on the allegations involved, the inquiry may be conducted in accordance with applicable Emory policies that prescribe specific inquiry/investigation processes or procedures. For example, if the allegations concern research misconduct, the inquiry/investigation process outlined in Emory's Policy on Research Misconduct shall be followed.

E. No Retaliation: Emory University prohibits retaliation against:

- (1) Employees who in good faith report accounting/auditing irregularities or fraud, or cooperate with the investigation of alleged accounting/auditing irregularities or fraud; and
- (2) Employees who in good faith report research misconduct, misuse of research funds, violations of policies or regulations regarding human subject or animal research, or violations of HIPAA policies/regulations.

F. Violations of this Policy: Violations of this Policy by employees, including violations of any of the underlying policies referenced herein, may result in disciplinary actions or sanctions by appropriate University administrators, up to and including termination of employment.

Definitions

Federal Research/Contract Activities – federally-sponsored research activities or activities undertaken in the provision of items and/or services to federal agencies pursuant to a contract or subcontract.

Related Links

- Current Version of This Policy: <http://policies.emory.edu/7.20>

Contact Information

Subject	Contact	Phone	Email
Clarification of Policy	Office of Research Compliance	404-727-2398	orc@emory.edu

Revision History

- Version Published on: Feb 01, 2009 (Updated title and broken URL links)
- Version Published on: Feb 01, 2009 (Original Publication)