

HOWARD UNIVERSITY CODE OF ETHICAL CONDUCT

Adopted by the Board of Trustees on March 7, 2020

(Replacing the Code of Ethics and Conduct August 1998
adopted by the Board of Trustees June 6, 1998)

CODE OF ETHICAL CONDUCT

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CODE OF ETHICAL CONDUCT

I. STATEMENT OF PURPOSE

As part of Howard University's commitment to excellence, this *Code of Ethical Conduct* sets forth the common obligations, responsibilities and accepted principles of ethical conduct to which all members of the Howard University (the "University") community must adhere. The *Code of Ethical Conduct* applies to all members of the University community which is defined as members of the Board of Trustees, students, faculty, and administrative and healthcare personnel ("University Community"). It is the University's policy to conduct itself with the highest degree of integrity and honesty in all of its dealings.

Because of the sensitive nature of some positions and the high degree of trust placed in those individuals occupying such positions, this Code of Ethical Conduct places special responsibilities on trustees and Senior Administrative Personnel. For the purposes of this document, the term "Senior Administrative Personnel" shall include the president, the provost, deans, directors, vice presidents, and the chief compliance officer.

II. RESPONSIBILITIES

The University Community shares the following fundamental responsibilities:

To Our Students -- we have the responsibility to provide fair access to all educational opportunities and benefits available at the University in an environment that is free of harassment, discrimination, or intimidation.

To Our Faculty -- we have the responsibility to offer a fair opportunity to teach, conduct research, and to provide service to the community in a setting that provides the academic freedom necessary to cultivate a wide expanse of ideas and teaching methods.

To Our Administrative Staff -- we have the responsibility to provide a work environment that is safe and free from illegal discrimination and fosters the opportunity to develop to their fullest potential.

To Our Patients -- we have the responsibility to offer the highest quality of services and care.

To Our Neighbors -- we shall strive to be exemplars of our values within our community and offer service when we can.

To Our Trustees -- we owe our honesty and best judgment. We must manage the University's assets prudently and fairly in accordance with the trustees' direction and in accordance with the law.

To Our Government -- we have an obligation to always be truthful in our dealings with federal, state and local governments and never to initiate or tolerate a circumstance within our control that may result in the improper use of public funds.

III. REQUIRED CONDUCT

All members of the University Community shall conduct themselves professionally and with integrity, adhering to the following standards and avoiding any conduct that is an actual or apparent violation of these standards at all times.

A. Professional Conduct Adhering to University's Mission and Core Values

Howard University has stated its mission as follows: Howard University, a culturally diverse, comprehensive, research intensive and historically Black private university, provides an educational experience of exceptional quality at the undergraduate, graduate, and professional levels to students of high academic standing and potential, with particular emphasis upon educational opportunities for Black students. Moreover, the University is dedicated to attracting and sustaining a cadre of faculty who are, through their teaching, research and service, committed to the development of distinguished, historically aware, and compassionate graduates and to the discovery of solutions to human problems in the United States and throughout the world. With an abiding interest in both domestic and international affairs, the University is committed to continuing to produce leaders for America and the global community.

Every member of the University Community shall carry out his or her professional duties faithfully and to the best of their ability at all times in furtherance of the University's mission. Excellence, leadership, service and truth are the University's core values as the University aims to forward the development of scholars and professionals who drive change and engage scholarship that provides solutions to contemporary global problems.

B. Respect for the Rights and Dignity of Others

Every member of the University Community is prohibited from discriminating on the basis of race, color, religion, sexual orientation, gender/or gender identity or expression, marital or parental status, national origin, citizenship status, veteran or military status, age, disability and other legally protected status; physically or emotionally assaulting, abusing or harassing anyone; and depriving anyone of rights in physical or intellectual property under University policy, federal, state or local laws.

C. Access to Educational Benefits and Opportunities

No member of the University Community shall deny a student fair access to educational opportunities and benefits available at the University. Harassment, discrimination, or intimidation of students that deny or impede their right of access to these benefits and opportunities will not be tolerated and will be subject to disciplinary action. No member of the University Community shall deny any member of the faculty a fair opportunity to teach, conduct research, and to provide

services to the community in a setting that provides the academic freedom necessary to cultivate a wide expanse of ideas and teaching methods. Unwarranted interruption of classes or other academic activities is an abridgment of the right of the faculty to teach and an abridgment of the rights of the affected students to learn.

D. Fair Employment Practices

Every member of the University Community is expected to be an exemplar of the University's core values of excellence, leadership, service and truth, and to treat each other and members of the public with courtesy, professionalism, and civility. No member of the University Community shall engage in any employment practice that is a violation of federal law, the laws of the District of Columbia, or the laws of any other local jurisdiction where the University has employees or conducts business. No one in a supervisory position, or in any position of higher authority in the University, is to use his or her position to intimidate subordinate employees or to exact personal favors or things of value (for which a fair market price has not been paid) from employees of lesser rank within the University.

E. Provision of Highest Standard of Patient Care

Every member of the University Community involved in furnishing health and health-related services is expected to provide the highest quality of care responsive to the needs of patients, their families and the community which the University serves through its academic medical center Howard University Hospital, to maintain patient records and documentation in accordance with applicable law and best practices, to protect patient confidentiality, and to comply with all laws and regulations governing the provision of healthcare.

F. Maintaining Highest Standards of Academic, Professional and Personal Integrity

Every member of the University Community is expected to conduct University affairs, including all business, teaching and research activities, and all personal affairs with honesty and integrity. This duty includes adherence to all applicable University policies and federal, state and local laws and regulations. Any violation of law, regulations or University policies, including actions such as fraud, plagiarism, misrepresentation, falsification of data, whether committed on or off campus, will be deemed a breach of this *Code of Ethical Conduct*.

G. Avoidance of Conflicts of Interests

Members of the University Community must conduct their University-related activities in a manner that steadfastly avoids conflicts between personal interests and official responsibilities or utilizing any position with the University for personal benefit. Members of the University Community shall be objective, independent and impartial and conduct their duties in a manner that assigns first priority to the needs and goals of the University. Every member of the University Community shall avoid not only actual conflicts of interest but the appearance of conflicts of interests. Accordingly, no trustee, member of the faculty, or employee of the University may receive or solicit anything of value in return for influencing or exercising his/her discretion in a particular way on a University matter, with the exception of the acceptance of an item having a

nominal value or ceremonial gifts received by officers or trustees of the University in their official capacity. All transactions which are or give the appearance of a conflict of interest must be immediately disclosed and reported in writing to the chief compliance officer of the University.

H. Confidentiality and Maintenance of Accurate Accounts and Records

As members of the University Community, we recognize that we are often the custodians of personal and institutional information that we have a responsibility to protect. Members of the University Community who improperly convert records and accounts for their own personal use or for the personal use of another, or who wrongfully disclose such records or accounts, will be subject to appropriate legal sanctions by the University. To further the enforcement of this standard of conduct, certain employees who occupy sensitive or confidential positions may be asked to execute confidentiality agreements with the University as a condition for employment or continued employment.

As members of the University Community, we recognize the importance of maintaining the accounts and records of the University in a manner that provides for an accurate and auditable record of all financial transactions in conformity with best practices in accounting, established business practices, and all relevant provisions of controlling law.

I. Proper Use of University Assets and Resources

As members of the University Community, we recognize the importance of acting in good faith, responsibly and with due diligence and care regarding the use and control of University assets and resources. University assets and resources shall not be used for other than their intended purpose or improperly converted for one's personal use or any unauthorized use. No member of the University Community shall offer University assets and resources to another in order to obtain unfair or personal advantage, not based on the merits of a transaction, or otherwise offer those assets and resources in a manner or under circumstances that would establish a violation of law.

J. Government Relations

Every member of the University has a duty to make full, accurate, and honest representations concerning all relevant information submitted to or requested by the local, state or federal government, and to maintain records and accounts in accordance with generally accepted accounting principles and otherwise in compliance with all pertinent local, state or federal government directives and regulations. No member of the University shall withhold material information from the local, state or federal government, or engage in any other course of conduct that may be or appear to be deceptive or misleading.

K. Duty to Report and Cooperate

Every member of the University Community has a duty to cooperate with the University's general counsel in the initiation and defense of actual or contemplated litigation affecting the interests of the University and in the conduct of any investigation of a violation of this *Code of Ethical Conduct*. In addition, Trustees and Senior Administrative Personnel are under an

affirmative obligation to report reasonably suspected violations of this *Code of Ethical Conduct* to the University's chief compliance officer. To encourage members of the University Community to report and cooperate with the investigation of violations of this policy, all members of the University shall be afforded the protection of applicable whistleblower and prevention of retaliation policies of the University.

IV. ADDITIONAL OBLIGATIONS OF TRUSTEES AND SENIOR ADMINISTRATIVE PERSONNEL

Trustees and Senior Administrative Personnel shall complete and submit for review by the Chief Compliance Officer with respect to Senior Administrative Personnel, and by the Secretary to the Board and the Audit and Legal Committee with respect to the trustees, on at least an annual basis, a Conflict of Interest Disclosure Form ("Form"). The Form shall be amended, as needed, whenever there is a material change in the circumstances of the reporting person that would make the Form then on file materially false or misleading. In addition, all trustees must agree and sign a Statement of Responsibilities ("Statement") that will provide guidance on the special responsibilities attendant to that office. The Form and the Statement may be changed from time to time in consultation with the Board of Trustees.

V. IMPLEMENTATION

The president of the University shall issue such directives or instructions as may be needed to implement this *Code of Ethical Conduct*. The Audit and Legal Committee of the Board of Trustees shall be advised of such directives and instructions. At the request of the Audit and Legal Committee, the full Board of Trustees may consider the president's directives and instructions and take such action in response thereto as it may deem appropriate.

This document is not intended to be a procedural manual or a detailed or all-inclusive account of proscribed conduct. If any member of the University Community should require a greater degree of specificity as particular circumstances arise, guidance can be obtained from the University's chief compliance officer, general counsel or chief human resources officer.

VI. AMENDMENTS

This *Code of Ethical Conduct* is voluntarily adopted by the Board of Trustees and may be amended by the Board of Trustees at any time, with or without notice, and without the provision of consideration to any party.