



## **Code of Business Conduct & Ethics**

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Charleston Southern University's Code of Conduct requires members of the university community to observe the highest standards of professional conduct and ethics in the conduct of their duties. Employees and other representatives of the university must practice honesty and integrity in fulfilling their responsibilities and comply with all applicable laws and regulations. All members are expected to understand and comply fully with all state and federal laws, regulations, and interpretations thereof that are related to their particular duties.

The Charleston Southern University's Code of Conduct applies to the following members of the university community:

- Individuals employed by the university, using university resources or facilities, or receiving funds administered by the university
- Officers, employees, or agents of the institution involved who have responsibilities with respect to education loans.
- Consultants, vendors, and others under contract with the university; and
- Individuals who perform services for the university as volunteers.
- Coaches
- Work-study students.

The code of conduct refers to all these persons collectively as “members of the university community,” “community members,” or “members.”

### **Confidentiality**

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The University maintains confidential records for a variety of business needs. Records include detailed information about students, job applicants, employees, finances and future planning. All of this information must be kept strictly confidential and not released to anyone outside the University without written consent or lawful court order. All personnel must avoid discussing confidential information with outsiders, or where others, including family, can overhear them.

### **Discrimination**

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It is against the law to discriminate against an employee or student on the basis of race, color, sex, age, national origin or other protected status. Any person with information that an individual is improperly discriminating or being discriminated against should report that information.

### **Accounting For and Recording Transactions**

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The University's books, records, accounts and financial statements must be maintained in reasonable detail accurately depicting the University's transactions and conforming to applicable legal and accounting standards giving effect to the University's system of internal controls. Unrecorded or “off the



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books” assets must never be maintained under any circumstances. The accurate and timely reporting of the University’s financial statements requires all financial information to be recorded in the normal course of business, precisely and promptly. The University’s systems for recording and reporting information should be functioning properly and subject to periodic and thorough evaluations.

This obligation applies to all reports or records, financial or otherwise, prepared for either internal or external purposes. While you may not always be familiar with specific accounting or other applicable procedures, you are responsible to make sure that every business record prepared by you, or under your direction, is accurate, complete and reliable. If you are uncertain or in doubt, you should contact the office of the Vice President for Business Affairs.

Casual notes, internal memoranda, email, faxes, other written communications and business records often become subject to public scrutiny. You should avoid exaggeration, derogatory remarks, guesswork or inappropriate characterizations that can be misunderstood or misconstrued.

Responsible persons must not coerce, manipulate, mislead or improperly influence the University’s auditors in the performance of an audit or review of the University’s financial statements.

### **Record Retention**

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State and federal laws require that Charleston Southern University keep certain records for specified periods of time. It is the University’s policy to maintain records for the legally required duration. The legal requirements are many and varied so before you discard any documentation; it is wise to check with your supervisor regarding any requirements that might exist. All Charleston Southern University personnel should learn and follow the record retention policies of their department.

### **Theft and Dishonesty Policy**

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Employees are expected to safeguard and avoid misuse of the funds, records, tangible assets, intellectual property, and other property of the University. Employees are also expected to conduct the business affairs of the University in a manner that complies with applicable state, federal and local laws.

Employees are prohibited from engaging in any activity that may involve theft, misappropriation, or other misuse of University property, or violation of law, including but not limited to the following:

- Theft or unauthorized use of University funds, equipment, supplies, and other tangible property, and data, software, and other intellectual property;
- Misuse of University cash, credit cards, checks, and other financial instruments to purchase personal items or divert University funds to personal use or to unauthorized third parties;
- Falsification of University time or payroll records, expense reimbursement reports, and other University forms, reports, and records;



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- Misappropriation of University data, trade secrets, copyrighted material and other intellectual property for personal use or unauthorized use by third parties;
- Conducting University business affairs in violation of local, state and federal laws; and
- Intentional misstatements in University financial statements, tax or information returns, or other financial reports and records, including the intentional misstatement of the results of operations.

Employees are encouraged to report immediately any known or suspected violation of the theft and dishonestly portions of this code. See “Whistleblower Policy” for more information.

### **Cooperation with Law Enforcement and Government Investigations**

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Federal and State agencies have broad rights to investigate matters involving employees, and students. Charleston Southern University policy is to cooperate with law enforcement investigations and activities within the bounds permitted by law. Anyone who is contacted, orally or in writing, at home or at work, by a person stating that he or she is investigating on behalf of the government or an insurer, has the right if they so desire to state that they will respond only in the presence of an attorney, and therefore has the right to delay the investigation for that purpose. If you are presented with a subpoena, warrant, or court order, you have the right to an attorney when speaking with the government agent. Any person who elects to speak with a law enforcement officer should tell the complete truth.

### **Fair Dealing**

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You should always respect the rights of, and deal fairly with, Charleston Southern University and its employees, volunteers, and work-study students. You should never inappropriately take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, innuendo or any other unfair-dealing practice.

### **Environmental Health, Safety and Waste Disposal**

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The University must comply with government rules and regulations that protect the environment, the public and promote workplace safety. Hazardous materials must be properly controlled and monitored at all stages of use in accordance with laws and regulations. All persons with access must comply with various environmental laws in the disposal of hazardous waste, infectious waste, and “select agents.” Universal waste and e-waste must be recycled. Individuals should learn and follow their organization’s waste disposal policies. Supervisors must arrange for training in accordance with laws and regulations for employees responsible for waste disposal, storage, packaging and labeling. Spills or releases must be reported promptly to Campus Safety who will coordinate with the Physical Plant for assistance in cleaning up large spills.



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### Alcohol and Drug Free Workplace

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The unlawful manufacture, distribution, dispensation, possession, or use of alcohol or controlled substances including illicit drugs, is prohibited on property owned or operated by Charleston Southern University and is grounds for disciplinary action. No Charleston Southern University employee may report to or engage in university related work while under the influence of illegal drugs or be intoxicated by alcohol. Employees who are convicted of a violation of a criminal drug statute as a result of an incident occurring in the workplace or while on university property, must notify the Human Resources Director in writing within five days of his or her conviction. Such conviction will be grounds for mandatory evaluation and possible treatment for substance abuse disorder and for disciplinary action, up to and including termination.

### Education Loans

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In regards to Title IV loan programs, the following are strictly prohibited in dealing with lenders, guarantors, or servicer of loans:

- revenue-sharing arrangements
- gifts from a lender, guarantor, or servicer of loans to any officer, employee in the financial aid office, or agent with responsibility for loans, except for
  - material or programs related to loans, default aversion, etc.
  - food, refreshments, training, or informational material furnished as an integral part of a training program
  - favorable terms, conditions on a loan provided to a student-employee, if the benefits are comparable to those provided to all students
  - entrance and exit counseling services, as long as institutional staff maintain control and the products and services of any lender are not promoted
  - philanthropic contributions to an institution that are unrelated to education loans and not made in exchange for any advantage related to education loans
- contracting or consulting arrangements except that
  - an employee or officer who is not employed in the financial aid office and does not have responsibilities for loans may perform paid or unpaid service on a board of directors of a lender, guarantor or servicer



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- an employee or officer who is not employed in the financial aid office but does have responsibilities for loans may perform paid or unpaid service on a board of directors of a lender, guarantor or servicer if the institution has a conflict of interest policy that requires them to recuse themselves from decisions regarding the institution
- an officer or employee of a lender, guarantor, or servicer may serve on a board of directors of an institution if the institution's conflict of interest policy requires them to recuse themselves from decisions regarding student lending
- assigning a first-time borrower's loan to a particular lender, or refusing to certify, or delay certification of any loan based on the borrower's selection of a lender
- asking for or accepting any offer of funds to be used for private educational loans or opportunity pool loans in exchange for providing a lender with loan volume or a preferred lender arrangement
- requesting or accepting staffing assistance from a lender, except for
  - professional development training
  - educational counseling, financial literacy, or debt management materials
  - short-term staffing assistance to help the institution during emergencies
- payment, except for reimbursement for reasonable expenses, by lenders or guarantors to financial aid office employees or others with responsibilities for education loans

### **Health Insurance Portability and Accountability Act**

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In support of activities related to its mission, Charleston Southern University maintains personal healthcare information about its students, faculty, staff and administrators. The University is committed to protecting the privacy and confidentiality of this information. In this regard, the University endeavors to comply with all federal and state statutes and regulations including, but not limited to, the Health Insurance Portability and Accountability Act (HIPAA) governing the maintenance and use of personal healthcare information. All University personnel are expected to comply with these statutes and regulations.

### **Other Laws, Regulations, University Policy**

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The above is only a summary of significant laws, regulations and policies affecting the University. All personnel must adhere to all laws, regulations and policies, even if they were not specifically mentioned above.



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### **Individual Responsibility**

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We each are responsible for safeguarding and promoting Charleston Southern University through ethical and principled leadership and action that is informed and directed by our core values. This type of ethical and principled leadership is sometimes difficult. There will be times when situations will involve subtleties and complexities that lead to difficult choices. When in doubt, ask yourself whether you feel confident that your actions and decisions would withstand objective scrutiny. If there is any doubt, it will often be helpful to seek guidance and advice from this Code and from other trusted directors and officers.

Each employee is personally responsible to act in accordance with the policies of Charleston Southern University as set forth in this document and otherwise. Violating these policies or failing to report violations could subject an employee to disciplinary action, up to and including termination.