

THE ROCKEFELLER UNIVERSITY CODE OF CONDUCT

A LETTER FROM THE PRESIDENT:

Dear Colleagues:

The following represents The Rockefeller University Code of Conduct. Reviewed by the Academic Council and the Executive Officers Group, this document is being distributed to all members of the community. We encourage you to read it carefully.

At this time, the University, in common with most non-profit organizations, wishes to demonstrate its commitment to good governance and to state clearly the principles of integrity and fair dealing we will follow.

The Code of Conduct does not substitute for individual responsibility and good judgment. Rather, the Code articulates the ethical and legal principles to which the University subscribes, and identifies many of the documents that set forth the University policies that address these matters.

Our University is a diverse organization that is held together through common goals and consistent standards of conduct. This Code of Conduct helps clarify what we stand for and the rules by which we live.



Richard P. Lifton
President

Note: Throughout the text of this Code there are references to policies closely related to the Code provisions. Those policies help to implement but do not limit the Code provisions with which they are associated.

ETHICAL CONDUCT

As members of the community, we should conduct ourselves ethically, honestly and with integrity in all dealings. We must be fair and principled in our interactions and must deal in good faith with others, both inside and outside the community. We should act with due recognition of our position of trust and loyalty with respect to the University's research sponsors and donors. We are accountable to each other, to the University, and to ourselves for our actions and omissions, as well as to the general public. When in doubt about the propriety of a proposed course of action, members of the community should seek counsel from those colleagues, supervisors, or administrators who can assist in determining the right and appropriate course.

RESPECT FOR OTHERS

The Rockefeller community is diverse – in experience, culture, age, race, religion, and in many other ways. The personal actions of each community member contribute to establishing and maintaining the culture of tolerance and respect for which we strive. While principles of free speech remain paramount at Rockefeller, members of the community should respect the rights and dignity of others regardless of differences, and conscientiously abide by the principles of nondiscrimination adopted by the University. Intolerance based on sex, religion, race, sexual orientation or politics has no place in our community. (See equal employment opportunity/affirmative action policy – page 14; see also harassment and intimidation policies – page 25).

COMPLIANCE WITH UNIVERSITY POLICIES AND PROCEDURES

The University has established policies and procedures for managing its research, business and other operations. Some are required by law and others are designed to ensure smooth and coordinated operations. Members of the Rockefeller community are expected to inform themselves of and comply with applicable University policies and procedures, some of which are referenced in this Code of Conduct.

CONFLICT OF INTEREST

The Rockefeller community should be sensitive to situations which could raise questions of potential conflicts or the perception of conflicts between personal interests and the University's or the public's interests. As part of the Rockefeller community, we should each consider ourselves to be in positions of trust and conduct ourselves accordingly. In all our dealings, we must act with fairness and the appearance of fairness. We must be particularly aware of situations where there exists a perception of conflict between a person's private interests and official responsibilities. Such conflicts can arise in many areas (for example, government grants and contracts, investments, positions with for-profit companies, and interactions with present or prospective employees or members of the community). Members of the community who have a duty to report regarding conflict of interest must do so faithfully and accept the obligations inherent in the University's policy for managing conflicts, for the protection of our research effort, our investigators and the University itself. (For specific conflict of interest policy for persons involved in research see page 11).

COMPLIANCE WITH ALL APPLICABLE LAWS AND REGULATIONS

The University operates in a heavily regulated environment. Compliance with laws is essential as a matter of principle. Members of the community should recognize that noncompliance can have severe adverse financial and other consequences, potentially affecting the reputation and operations of the entire University. The Rockefeller community must comply rigorously with federal, state, and local laws and regulations that apply to the performance of our responsibilities at the University. All have a duty to inform themselves, through University sources and independently, about relevant legal obligations, and to keep current with changes in applicable law. When in doubt about the interpretation of the law, community members should seek advice from the Office of the General Counsel.

COMPLIANCE WITH CONTRACTUAL, GRANT, AND OTHER OBLIGATIONS

The Rockefeller University is committed to adhering to its contractual obligations to donors, the government, suppliers and others. The University will adhere to its contractual requirements and will fulfill its contractual obligations. In any instance where particular contractual or grant requirements are difficult to interpret or apply, Rockefeller personnel should consult with their Head of Laboratory or supervisor. See related Rockefeller University policies at www.rockefeller.edu/cgi-bin/finance/researchadmin/index.cgi; also see sponsored program policies at www.rockefeller.edu/osp/files/forms.html.

STEWARDSHIP OF UNIVERSITY PROPERTY AND FUNDS

As stewards of University property and funds, and with a responsibility to the University's contributors, including donors and federal, state, and local governments, the Rockefeller community should treat University property with care, as if it were our own property, and must expend funds prudently. University property should be used only for appropriate University purposes (and occasional incidental personal use of minimal value); wastefulness should be avoided. Our acts should reflect the recognition of an obligation to use University property consistent with the tax-exempt status conferred on the University. See related policies in this handbook.

USE OF COMPUTERS AND ELECTRONIC COMMUNICATIONS

The University's policy on the use of computers, computer networks, and ancillary communications equipment calls for ethical behavior on the part of all campus users. Any information transmitted to, received from, or stored via the University's computers, computer networks, and ancillary communications equipment and services is the sole property of the University (or otherwise subject to copyright protection). The University may restrict or deny

the use of its computers and network systems in the event of violations of University policies, federal, state, or local laws, or standards of conduct appropriate at the University. See related policies in this handbook and on page 7.

RECORDING, ALLOCATING AND CHARGING COSTS AND EFFORT

The accuracy and reliability of financial and effort reports is of paramount importance to the operations of the University. At all times, Rockefeller faculty and staff must record, allocate, and charge costs and effort accurately (for those staff members requiring effort reporting) and maintain supporting documentation as required by established policies and procedures. See related fiscal policies at www.rockefeller.edu/cgi-bin/finance/policiesguidelines.cgi.

CONFIDENTIAL INFORMATION

The University is entrusted with many kinds of confidential, proprietary and private information. It is imperative that those who have access to this information make no unauthorized disclosures of the information, either during or after affiliation with the University.

GIFTS, GRATUITIES AND "KICKBACKS"

The Rockefeller University and its vendors must be free of any taint. Members of the community should not accept any material gift, gratuity, or other payment, in cash or in kind, from any vendor seeking to do business or currently doing business with the University. For example, an acceptable gift may be a fruit basket received at holiday time and shared with the recipient's department. Cash is never an acceptable gift. See related procurement policies at www.rockefeller.edu/purchaseandsupply/policies.php.

HEALTH, SAFETY AND THE ENVIRONMENT

The Rockefeller University is committed to providing safe and healthy work environments at its facility for all members of the community and for our visitors. We are committed to providing employees with a drug-free workplace and to compliance with the New York City smoking law. We are dedicated to designing, constructing, maintaining and operating facilities that protect our people and physical resources. It is our policy to comply with all applicable health and safety laws and regulations, to provide and require the use of adequate protective equipment and measures, and to insist that all work be done in a safe and responsible manner. It is the responsibility of each member of the Rockefeller community to follow all University policies and procedures related to workplace health and safety. Rockefeller is also pledged to being an environmentally responsible corporate citizen. We are committed to minimizing the impact of our facility on the environment with methods that are socially responsible, scientifically based and economically sound. See related policies at www.rockefeller.edu/lab/policiesProcedures.php; see also the Smoking Policy on page 36 and the Substance Abuse Policy on page 37.

REPORTING SUSPECTED IMPROPER CONDUCT

Members of the Rockefeller community should report material violations of this Code of Conduct, laws and regulations, or University policies and procedures to one or more of the following: a supervisor, the Vice President for Finance, the Vice President for Human Resources, the Vice President for Academic Affairs, the University's General Counsel or the Chair of the University's Audit Committee. Individuals charged with supervising others at the University should do so actively, making sure that those under their supervision receive adequate training in order to meet their obligations under this Code of Conduct. Supervisors are expected to take appropriate disciplinary action to address noncompliance.

CONSEQUENCES OF VIOLATIONS

Violations of this Code of Conduct, of laws and regulations, or of University policies and procedures may carry disciplinary consequences, up to and including dismissal.

NO RIGHTS OR CLAIMS

This Code of Conduct and the University Policies are not contracts of employment and do not create rights or claims of any kind for members of the University community or expectations regarding employment at The Rockefeller University.