



Roswell Park Cancer Institute Policy and Procedure	Date Issued: 3/1/1994	Number: 708.1
Title: Conflict of Interest – HRI Employees	Revision: 5	Effective Date: 10/26/15
Prepared by: General Counsel	Approved by: Michael B. Sexton, General Counsel	Page: 1 of 2

A. GENERAL STATEMENT OF POLICY

This statement outlines the Health Research, Inc. policy regarding conflicts of interest.

B. SCOPE

This policy and procedure applies to all HRI, Roswell Park Division employees, officers and consultants.

C. ADMINISTRATION

This policy and procedure is to be administered by the Director of Operations of HRI, Roswell Park Division.

D. POLICY / PROCEDURE

All the following statements apply to all officers, employees, or consultants of HRI.

The following statements apply to all direct (you) and/or indirect (e.g. spouse, parent, child, significant other living with you) transactions, associations, interests.

1. No officer, employee or consultant of HRI should have any interest, financial or otherwise, direct or indirect, or engage in any business, or transaction, or professional activity, or incur any obligation of any nature which is in a direct conflict with the proper discharge of his/her duties in the best interests of HRI.
 - a. No officer, employee or consultant should accept other employment, gifts, gratuities, or any other considerations from a party who is connected with HRI through grants, purchases, leases, contracts, projects or other business and financial relationship, direct or indirect, which will or could impair the officer's, employee's or consultant's independence of judgment in the exercise of his/her duties and responsibilities.
 - b. No officer, employee or consultant should accept employment or engage in any business or professional activity that will require him/her to disclose confidential information which he/she has gained by reason of his/her position or authority within RPCI and/or HRI.
 - c. No officer, employee or consultant should disclose confidential information acquired by him/her in the course of his/her duties except as required by law, no officer, employee or consultant shall use such information to further his/her

personal interests, unless such information has previously been made public, and is therefore no longer confidential.

- d. No officer, employee or consultant should use or attempt to use his/her position to secure privileges or gifts he/she would not ordinarily be offered.
- e. No officer, employee or consultant should engage in any transaction as with any business entity in which he/she has a direct or indirect financial interest that may reasonably tend to conflict with the proper discharge of his/her duties or responsibilities within RPCI or HRI. Examples of prohibited transactions may include: transacting a purchase on behalf of RPCI or HRI while holding stock or a significant equity ownership in that specific vendor or transacting purchases on behalf of HRI with a spouse who will receive commissions or salaries based on those purchases.
- f. An officer, employee or consultant should not explicitly or by his/her conduct state or imply that any person can influence him/her or unduly obtain his/her favor in the performance of his/her duties, or that he/she is affected by the kinship, rank, position or influence of any party or person.
- g. An officer, employee or consultant should abstain from making, directly or indirectly, personal financial investments in or otherwise obtaining financial interests in, enterprises related to HRI (through grants, purchases, leases, contracts, projects or other business and financial relationships) that may be directly involved with decisions made by the officer, employee or consultant or that will otherwise create substantial conflict between the conduct of his/her duties in the best interests of HRI and his/her private interest.

2. DISCLOSURE:

All existing or potential conflicts of interest must be disclosed by the employee involved to the Director of Operations of HRI, the Chair of the Conflicts of Interest Committee, or the Department Chair/Division Head, or Manager, as applicable or his/her designee for review and determination of whether a violation of this policy exists.

3. NOTIFICATION:

All notification or inquiries concerning possible violation of this policy should be filed no later than one week after a conflict is discovered. The Director of Operations of HRI or his/her designee will review and determine whether a violation of this policy exists. If a violation exists, the Director of Operations should bring it to the attention of the COI Committee for resolution.

4. VIOLATIONS:

In addition to any penalty contained in any provision of law, any HRI officer, employee or consultant who violates any of these provisions will be subject to the disciplinary procedure.

E. DISTRIBUTION

This Policy and Procedure will be distributed to all Managers via the RPCI internal web page and to holders of backup hard copies of the manual. Managers are responsible for communicating policy content to pertinent staff.