



VANDERBILT
UNIVERSITY

Vanderbilt University Standards of Conduct

A: Introduction

Vanderbilt University is committed to the highest standards of ethics, honesty, and integrity in pursuit of its mission of education, research, public service, and in supporting health care through its affiliation with Vanderbilt University Medical Center (VUMC). All members of the Board of Trust, the Chancellor, general officers, the executive administration, administrative officers, members of the faculty and staff, and others representing Vanderbilt University are expected to adhere to these Standards of Conduct in the discharge of their duties. The Vanderbilt University Standards of Conduct demonstrates the University's commitment to ethical conduct and compliance by setting forth guidelines for conduct designed to prevent and detect violations of law, uphold accreditation standards, comply with University policies, and encourage reporting of compliance concerns.

Faculty members employed by VUMC will be responsible in the conduct of their work for complying with the standards of conduct adopted by VUMC as well as the standards of conduct adopted by Vanderbilt University.

It is of paramount importance that all University faculty and staff in supervisory positions ensure that they and those they supervise adhere to the Standards of Conduct. The deans of the schools/colleges are responsible for ensuring that the Standards of Conduct are observed by faculty and staff within their schools/colleges. Staff and other University representatives are responsible for the conduct of those employees under their supervision. All members of the University community are responsible for reading and adhering to the Standards of Conduct. The following Standards of Conduct are also published at www.vanderbilt.edu/compliance.

B. Respecting Others

Vanderbilt is committed to fostering equity, diversity, and inclusion. By embracing these values, we nurture an environment of mutual respect, civility, and dignity. Embracing these values also enables us to promote freedom of inquiry and freedom to question, to criticize, and to dissent. We hold ourselves to this standard and we do not tolerate behavior that harasses, mistreats, or belittles or any other action that may harm another person. This is the foundation of ethical behavior at Vanderbilt and the basis of civil discourse within our academic community.

C. Compliance with the Law and University Policies

Vanderbilt University is committed to compliance with all applicable laws, rules, regulations, and University policies. It is the responsibility of each member of the University community, including staff, faculty, agents, representatives, contractors, and vendors, to follow, in the course and scope of their work for Vanderbilt University, all applicable laws, rules, regulations and University policies, and to maintain an educational, research, and business environment that is committed to integrity and ethical conduct. All questions and concerns about the legality or propriety of any action, or failure to take action by or on behalf of the University should be referred to the relevant supervisor, the Office of the General Counsel, or the Office of Audit, Risk and Compliance.

D. Responsible Reporting Of Suspected Violations

Vanderbilt employees are obligated to report in good faith all violations of law or Vanderbilt policies or any concern that a compliance violation may have occurred. Retaliation against employees for such reporting is prohibited and will result in disciplinary action. Members of the Vanderbilt community are expected to report violations and concerns as quickly as practical by contacting their immediate supervisor, the applicable compliance lead, the University Compliance Officer, or Audit, Risk and Compliance. Vanderbilt will take no adverse action against persons for making such reports in good faith, even if the report turns out to be incorrect. False accusations made with the intent of harming or retaliating against another person can subject the accuser to disciplinary action.

Vanderbilt prohibits retaliation against individuals for filing or encouraging another to file a complaint or report of violations of law, regulation or University policy, or for participating in an investigation of any such violation. Retaliation and adverse actions include the following: discharge, demotion, suspension, harassment, denial of promotion, transfer, or in any other manner discriminating or threatening to discriminate against an employee in the terms and conditions of that individual's employment. Any person who believes that he or she has been subjected to, or affected by, retaliatory conduct should report such retaliation to the Equal Employment Opportunity Office (EEOO). <https://www.vanderbilt.edu/eoo/>.

All persons making reports of compliance concerns are assured that such reports will be treated as confidential to the extent permitted by law. Such reports will be shared with others only on a bona fide need-to-know basis. In making reports to the Vanderbilt University Compliance Reporting Hotline, the caller may remain anonymous. The Compliance Reporting Hotline is administered by an outside vendor and has no call identification or number recognition capability. Vanderbilt University Compliance Reporting Hotline: (844) 814-5935 or www.vanderbiltcompliancehotline.ethicspoint.com.

E. Research and Scientific Integrity

Vanderbilt University is committed to compliance with applicable law in the conduct of research and health care services. In particular, Vanderbilt is committed to protecting health, safety, and welfare of human and animal research subjects and to conducting research with scientific integrity. Vanderbilt has adopted policies and procedures designed to foster the responsible conduct of research. It is essential that the conduct of research activities and the delivery of health care services be accurately documented as required by applicable laws, rules,

and regulations. Federal regulations relating to effort reporting and appropriate expenditure of funds must also be followed. In the interest of maintaining the highest standards of scientific integrity, researchers must familiarize themselves with all applicable and relevant federal and state laws governing their activities, and with University policies and procedures relating to misconduct in research (<http://research.vanderbilt.edu/>). Matters involving faculty employed by VUMC will be referred to the VUMC compliance officer with the expectation that the University and VUMC will work cooperatively to handle such compliance matters.

F. False Claims Act

Vanderbilt University requires all faculty and staff to report all known or suspected violations of the Federal False Claims Act (FFCA) or the Tennessee False Claims Act (TFCA) (collectively referred to as FCA). A person violates the FCA by knowingly submitting, or causing another to submit false claims for payment of government funds; making or using a false record or statement to get a claim paid; or engaging in conduct in order to procure anything of value from the state or any political subdivision. In addition, a person is liable under the FCA if they/she/he is a beneficiary of an inadvertent submission of a false claim and, after discovering the claim's falsity, fails to disclose it within a reasonable time.

False Claims Act and Whistleblower Protection Policy:
<http://hr.vanderbilt.edu/policies/whistleblower-protection.php>.

G. Protection of Minors

Vanderbilt University is committed to the protection of minors. Protecting minors is the responsibility of all members of our campus community. All University faculty, staff, students, and volunteers in Vanderbilt programs or operations who interact with individuals under the age of eighteen will be thoroughly screened, complete a background check, training, and adhere to the University's Code of Conduct When Interacting with Minors. Leaders and managers of programs and operations involving minors will ensure personnel are in compliance with the provisions of the Protection of Minors policy prior to scheduled activities. All members of the University are expected to follow Tennessee mandatory child abuse reporting laws, assess and screen internally for risk to minors, and uphold best practices to maintain a safe environment for minors participating in VU programs or under their care.

Protection of Minors Policy, information, forms, and registration:
<https://www.vanderbilt.edu/riskmanagement/protectionofminorslanding%20page.php>

Vanderbilt University Code of Conduct When Interacting with Minors:
<https://www.vanderbilt.edu/riskmanagement/pomcodeofconduct.php>

H. Vendor Relations, Antitrust, Anti-Kickback, and Foreign Corrupt Practices Act

Vanderbilt University is committed to complying with state and federal antitrust, anti-kickback, bribery, and fraud laws and regulations. Vanderbilt employees are expected to avoid activities that would give the appearance of preferential treatment toward any vendor. Vanderbilt policies and business practices prohibit setting charges in collusion with competitors, giving or receiving kickbacks, entering into certain exclusive arrangements with vendors, and sharing

confidential information with competitors. Except where specifically authorized, faculty, staff, and students are prohibited from making commitments or negotiating on behalf of the University or acting as its agent in procurement or contract matters. When someone who can influence purchasing decisions made at the University takes money or anything of value from a vendor, it can be considered a kickback, which is illegal. No gifts or accommodations of any nature, including unrestricted grants, may be accepted by the University or individual members of the University community when to do so would place them in a prejudicial or compromising position, interfere in any way with the impartial discharge of their duties to the University, or reflect adversely on their integrity or that of the University.

In addition, the Foreign Corrupt Practices Act (FCPA) prohibits the payment of bribes to officials of foreign governments. Specifically, the FCPA prohibits providing or promising to provide, directly or indirectly, any payment or item of value to a foreign official in order to influence that foreign official to act in violation of their lawful duty or to secure any improper advantage in order to assist in obtaining or retaining business. Faculty, officials, or other employees of a foreign government-controlled university could be considered “foreign officials” for purposes of the FCPA.

I. Conflicts of Interest and Commitment

Vanderbilt University is committed to managing potential conflicts of interest and commitment. Integrity and objectivity are essential qualities for University community members in carrying out the varied missions of Vanderbilt. All University faculty, staff, and representatives should avoid potential or perceived conflicts of interest and commitment. Individual conflicts of interest refer to situations in which an individual’s or family member’s financial, professional, or other personal considerations may directly or indirectly affect, or have the appearance of affecting, an individual’s professional judgment in exercising any university duty or responsibility, including the conduct or reporting of research.

All members of the University are required to disclose all outside activities and financial interests that might be, or have the appearance of being, conflicts of interest or commitment upon initial employment, and annually thereafter. An updated disclosure must also be submitted if changes in circumstances arise that may give rise to a potential conflict of interest. For more information or to submit a disclosure: <http://www.vanderbilt.edu/compliance/>.

Any concerns about a proposed transaction that may involve inducements offered by a vendor or supplier or a business relationship with a company that is connected with the employee or a family member, should be discussed with the appropriate dean, supervisor, or the Office of Conflict of Interest and Commitment Management.

Vanderbilt University Conflict of Interest and Commitment Policy:

www.vanderbilt.edu/generalcounsel/conflictinterest/COIPolicy_Effective_3-1-2022.pdf; also published in Part III of the Faculty Manual at <http://vanderbilt.edu/faculty-manual/part-iii-university-principles-and-policies/ch3-conflict-of-interest-and-conflict-of-commitment-policy/>

VUMC Conflict of Interest and Commitment Policy and information regarding that policy can be found at <https://vanderbilt.policytech.com/dotNet/documents/?docid=10927>.

J. Environment

Vanderbilt University is committed to complying with all applicable environmental laws and to maintaining all necessary environmental permits and approvals. Environmental compliance includes the proper handling, storage, use, shipment, and disposal of all materials that are regulated under any applicable environmental law. If any employee has actual knowledge that a spill, release, or discharge of any material regulated pursuant to an applicable environmental law has occurred, such employee must immediately report such event to their/her/his immediate supervisor so that necessary action may be taken. Necessary action may include evacuating employees, reporting such event to governmental authorities, and containing and cleaning up any such spill, release, or discharge. Employees with actual knowledge of any other potential violations of environmental laws that could endanger the health and safety of others also should report the matter to either the Environmental Health and Safety Office or the Workplace Safety Office: <https://www.vumc.org/safety/> and <https://www.vanderbilt.edu/workplace-safety/>.

K. Confidentiality

Vanderbilt University is committed to protecting confidential information. Many faculty and staff have access to various forms of sensitive, confidential, financial, or proprietary information. Federal law and University policies prohibit the unauthorized seeking, disclosing or giving of such information, including confidential information contained in health care records, student educational records, and employee records. All members of the University community are required to know and comply with laws and University policies related to information privacy and security.

FERPA: <http://registrar.vanderbilt.edu/ferpa/>

Payment Card Information: <https://www4.vanderbilt.edu/pcicompliance>

L. Electronic Communications and Information Technology Resources

Vanderbilt University prohibits the misuse of information technology resources. Vanderbilt's policies balance its commitment to intellectual freedom and open inquiry with its obligations to protect the security of private, sensitive, or proprietary information and the respect of others' intellectual property. Vanderbilt's network computing and electronic resources, including electronic mail, should be used in a manner consistent with the university's core missions and may not be used in a manner that violates laws, institutional policies, or principles of academic and research integrity. Members of the Vanderbilt community have a fiduciary responsibility to protect information from disclosure by refraining from accessing private or sensitive information without a legitimate business or educational purpose, by refraining from sharing their system passwords, and by following all other policies relating to protecting the security of information.

Acceptable Use Policy: <http://www.vanderbilt.edu/info/computing-aup/>;

Electronic Communications and Information Technology Resources Policy: <http://hr.vanderbilt.edu/policies/electronic-communications.php>;

Social Media Handbook: <https://social.vanderbilt.edu/handbook/index.php>;

Faculty Manual: <http://vanderbilt.edu/faculty-manual/part-iii-university-principles-and-policies/ch6-acceptable-use-of-information-technology/>;

PCI Compliance: <https://www4.vanderbilt.edu/pcicompliance/>

M. Controlled Substances

Vanderbilt University is committed to providing a drug-free workplace. In accordance with the University's Drug-Free Workplace policy, Vanderbilt prohibits the unlawful possession, use, manufacture or distribution of illicit drugs and alcohol on its property or as part of any University-sponsored activity. Additionally, members of the University community, including those who maintain Drug Enforcement Agency (DEA) registration, must comply with all federal and state laws regulating controlled substances. Federal law may impose sentences of up to twenty years in prison and fines of up to \$1,000,000 for violation of criminal drug laws.

Drugs and Alcohol Policy: <http://hr.vanderbilt.edu/policies/drug-alcohol.php>

Substance Abuse Policy: <http://hr.vanderbilt.edu/policies/substance-abuse.php>

N. Discrimination

As stated in Vanderbilt University's Equal Opportunity, Non-discrimination, and Affirmative Action policies, Vanderbilt University is committed to the principles of equal opportunity and affirmative action. Vanderbilt does not discriminate against individuals on the basis of their race, sex, sexual orientation, gender identity, gender expression, religion, color, national or ethnic origin, age, disability, military service, covered veteran status, or genetic information in its administration of educational policies, programs, or activities; admissions policies; scholarship and loan programs; athletic or other University-administered programs; or employment. Any faculty or staff member who experiences harassment or discrimination on grounds protected by the University's nondiscrimination policy should immediately seek assistance through the Equal Employment Opportunity Office. Vanderbilt prohibits retaliation against faculty or staff members who utilize the EEOO in good faith to make complaints of harassing or discriminatory conduct.

EEOO: <https://www.vanderbilt.edu/eoo/>

EEO/AA Laws: <https://www.vanderbilt.edu/eoo/obligations/laws.php>

Equal Opportunity, Non-Discrimination and Affirmative Action Policy:
<http://hr.vanderbilt.edu/policies/equal-opportunity.php>

Anti-Harassment Policy: <http://hr.vanderbilt.edu/policies/anti-harassment.php>

O. Sexual Harassment and Misconduct

Vanderbilt University is committed to the principles of equal opportunity and seeks to establish and maintain a safe and healthy environment for all members of the University community, guests, and visitors. The University provides programs, activities, and a campus environment that foster courtesy and respect. The University seeks to eliminate and prohibits all forms of sexual misconduct. Sexual misconduct, as defined by University Policy, includes sexual harassment, sexual assault, and other intimate partner violence, which includes dating violence, domestic violence, and stalking. Under federal law, including Title IX of the Education Amendments of 1972, the Violence Against Women Act, and the Violence Against Women Reauthorization Act of 2013, Vanderbilt has a duty to prevent and redress sexual misconduct and intimate partner violence. Such conduct is contrary to Vanderbilt's values, represents socially irresponsible behavior, and will not be tolerated. Vanderbilt encourages reporting of violations, will take prompt and effective action to address allegations of sexual misconduct and intimate partner violence, and will resolve complaints in a timely and fair manner. For further information on mandatory reporting of sexual misconduct and harassment, see the policies below.

EEOO: <https://www.vanderbilt.edu/eoo/>

Title IX Office: <https://www.vanderbilt.edu/title-ix/>

Anti-Harassment Policy: <http://hr.vanderbilt.edu/policies/anti-harassment.php>

Sexual Misconduct and Intimate Partner Violence Policy (cases involving students):
http://www.vanderbilt.edu/student_handbook/sexual-misconduct/

Sexual Assault, Stalking, Dating and Domestic Violence Policy in Cases Not Involving Students (Campus SaVE Act Policy): <https://hr.vanderbilt.edu/policies/save-act.php>

P. Responding to Investigation

Vanderbilt University is committed to cooperating with all government investigations as required by law. If an employee receives a subpoena, search warrant, or other similar document, before taking any action, the employee must immediately contact the Office of the General Counsel. The Office of the General Counsel is responsible for authorizing the release or copying of documents. If a government investigator, agent, or auditor comes to an employee's University office or laboratory, the employee must contact a supervisor, the Office of Audit, Risk and Compliance, or the Office of the General Counsel before an employee discusses any matters with such investigator, agent, or auditor.

Q. Enforcement of the Standards of Conduct

Vanderbilt University is committed to ensuring its employees abide by the Standards. Employees who fail to abide by these standards of conduct will be disciplined in accordance with the severity of the transgression up to and including termination. Discipline will be applied under the process applicable to the individual's employee type. It is the intent of the University to enforce discipline consistently across the organization.

R. Conclusion

Vanderbilt University is committed to following local, state and federal laws, rules and regulations. To assist the University with its commitment to appropriate conduct, all faculty, staff, and representatives are required to report violations of any law, policy, or Vanderbilt job-related criminal conduct to a supervisor, the University Compliance Officer, the Office of the General Counsel, or the Office of Audit, Risk and Compliance. Similarly, any known Vanderbilt job-related situations that may endanger the health and safety of any individual should be reported to one of the above offices or to the Vanderbilt University Police Department. All persons making such reports are assured that such reports will be treated as confidential and will be shared with others only on a bona fide need-to-know basis. Vanderbilt will take no adverse action against persons making such reports and prohibits retaliation against persons who make such reports in good faith.

Faculty and staff wanting to make a report of a violation or a potential problem may contact the University Compliance Officer at (615) 322-5162, or call the anonymous, confidential hotline at (844) 814-5935 (www.vanderbiltcompliancehotline.ethicspoint.com). In addition, relevant Human Resource Policies are available at <http://hr.vanderbilt.edu/policies/index.htm>.

Following these Standards of Conduct will help every member of the Vanderbilt Community do the right thing. It will also protect each member of the Vanderbilt community. Talking with the appropriate supervisor, manager, and colleagues is encouraged if something is not clear and, of course, the following offices are always available.

Chief Compliance Officer, Office of the General Counsel

2100 West End Avenue, Suite 1100
Nashville, Tennessee 37203
615-343-1901
<https://www.vanderbilt.edu/compliance/>

Office of the General Counsel

Office of Conflict of Interest and Commitment Management

2100 West End Avenue, Suite 1100
Nashville, Tennessee 37203
615-322-5155

For Anonymous Reporting:

Vanderbilt Compliance Reporting Hotline

<http://www.vanderbiltcompliancehotline.ethicspoint.com/>

Or call toll-free: 844-814-5935