



# EMPLOYEE CODE *of* ETHICAL CONDUCT

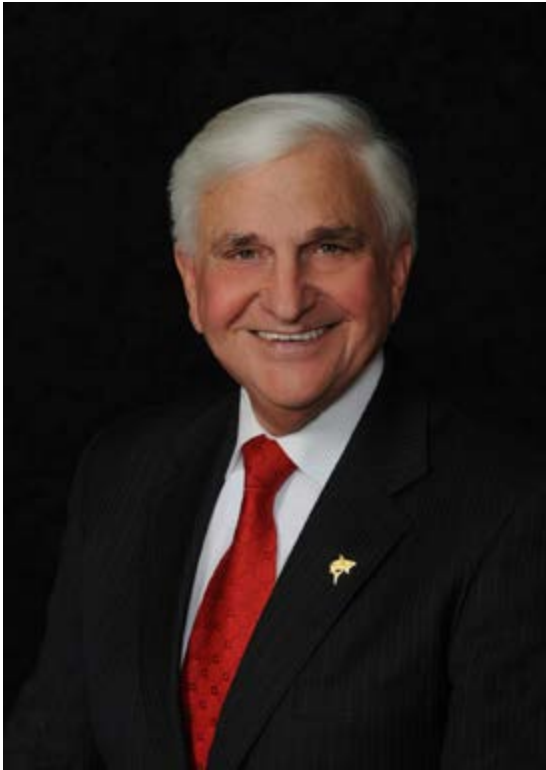
NOVA SOUTHEASTERN  
UNIVERSITY

**NSU**  
Florida



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## A Message from the President and CEO

Nova Southeastern University (“university” or “NSU”) embraces all of its employees as associates of the university individually representing the highest standards and ethical principles expressed within its stated core values. All employees regardless of their position at NSU are treated as an integral and essential associate of the university to further its overall mission and goals. An employee being an associate of NSU shows an ownership and sense of pride in their relationship with their fellow associates and the university as a whole. This connectivity forms a bond to the university to bring the core values to life in their everyday obligations and responsibilities. This Code will be known as the Employee Code of Ethical Conduct but will be built on a strong under-structure of associate to associate respect, integrity, honesty, fairness, and a sense of institutional purpose.

The Code is a living document and may evolve over time. I ask that you read the Employee Code of Ethical Conduct and think about how it applies to your responsibilities at NSU.

A handwritten signature in black ink that reads "George L. Hanbury II". The signature is written in a cursive, flowing style.

George L. Hanbury II, Ph.D.

President and CEO

Nova Southeastern University

## Introduction

NSU established an Employee Code of Ethical Conduct (“Code”) to help create and maintain a culture of integrity.

It is the responsibility of all employees of NSU to act in a manner consistent with this Code, and to hold others accountable to its terms and related policies. For purposes of this Code, the term “employee” includes all employees (full-time and part-time) including administrators, faculty, adjunct faculty, staff, temporary, and student employees.

Integrity is one of NSU’s eight (8) core values, and the university strives to uphold this core value by creating a culture of high ethical standards. To this end, the objective of the Code is:

- 1) To emphasize the university’s commitment to ethical conduct;
- 2) To provide a general overview of conduct;
- 3) To provide reporting mechanisms for good faith inquiries and concerns that may involve potential issues; and
- 4) To help reduce and/or minimize potential issues.

Likewise, since integrity is a university core value, students taking courses, attending classes, or enrolled in academic programs are governed by a Code of Student Conduct found in the [NSU Student Handbook](#).

Employees have an obligation to and are expected to report violations of the Code. NSU has established a procedure that allows employees with knowledge of, or who in good faith, suspect any improper conduct including violations of applicable policies, laws, rules and regulations to promptly report the matter to his or her supervisor or use the reporting process outlined in this Code, including the Ethics and Compliance Hotline (toll free at **888-609-NOVA (888-609-6682)**). No adverse actions will be taken against anyone for making a good faith report and/or raising a good faith concern.



The Code itself does not create additional or different rights or duties; rather, it helps to promote an organizational culture that encourages ethical conduct and a commitment to compliance with applicable laws and university policies and procedures. Additionally, the Code is not intended to replace, limit, or otherwise alter existing policies. It may be supplemented by specific university policies that have been adopted in the past and that may be adopted in the future. This Code may be amended or supplemented from time to time by the Audit and Compliance Committee of the Board of Trustees.

## Additional References

- [Non-Retaliation Policy at the NSU Ethics and Compliance Hotline Websites](#)



## Overview

### What Is a Code of Ethical Conduct?

A Code of Ethical Conduct is a tool to help create and maintain a culture of integrity. It is a set of expectations that outline the types of behaviors that are expected in the workplace.

### Why Is It Important to Have a Code of Ethical Conduct?

A Code of Ethical Conduct helps unite NSU employees by providing a set of expectations that all employees can follow by using the same behavioral standards.

### To Whom Does the Code of Ethical Conduct Apply?

The Code of Ethical Conduct applies to all employees (full-time and part-time) including administrators, faculty, adjunct faculty, staff, temporary, and student employees.

### What Are the Code of Ethical Conduct Certification Requirements?

Annually, as an employee of NSU, you will read and sign the Annual Employee Code of Ethical Conduct Certification attesting your commitment to adhere to the Code.

### What Are the Code of Ethical Conduct Training Requirements?

As an employee of NSU, you are responsible for knowing and following the Employee Code of Ethical Conduct. To help you learn about the Code, an on-line module has been developed to:

- Raise your awareness about the Employee Code of Ethical Conduct;
- Help an employee understand his/her responsibilities with regards to ethics and other laws, policies, and procedures; and
- Reduce the risk of ethical violations within NSU's colleges and departments.



The on-line program consists of two (2) parts: **1) The Employee Code of Ethical Conduct Awareness Training (“Code of Conduct Training”)**; and **2) The Annual Employee Code of Ethical Conduct Certification** attesting your commitment to adhere to the terms of the NSU Employee Code of Ethical Conduct.

### How Will the Code of Ethical Conduct Be Monitored?

The President has overall responsibility for ensuring the implementation of the Employee Code of Ethical Conduct within the university. The President’s Council is comprised of the university’s senior leadership including but not limited to deans, vice presidents, and executive directors who also have responsibility for ensuring implementation of the Code within his/her college or department.

The University Compliance and Integrity Office has been designated as the executive owner of the Code. Additionally, the university shall appoint an Employee Code of Conduct of Ethical Conduct Advisory Committee (“Advisory Committee”) within 90 days after the effective date of the NSU Employee Code of Ethical Conduct. The Advisory Committee should, at a minimum, include the Vice President for Compliance & Chief Integrity Officer and other members of senior management (e.g., President’s Council members, such as finance and operations). The Advisory Committee reviews the Code annually, and employees certify their commitment to adhere to the terms of the Code annually.

## Reporting Options

NSU has an expectation that employees will engage in ethical behavior and conduct themselves in accordance with applicable laws, regulations, and university policies.



### Expected Behaviors

Employees have an obligation to and are expected to:

- Report violations of the Code. NSU has established a procedure that allows employees with knowledge of, or who in good faith, suspect any improper conduct including violations of applicable policies, laws, rules and regulations to promptly report the matter to his or her supervisor or use the reporting process outlined in this Code, including the Ethics and Compliance Hotline (toll free at **888-609-NOVA (888-609-6682)**).
- Continue to report concerns through regular lines of communication. In many circumstances the best place to raise a concern or question is with your supervisor, or with a senior manager in your department. These individuals need to know about concerns that arise in the area under their management and should be in the best position to help you resolve concerns at a local level.

NSU realizes, however, that there may be circumstances when employees are not comfortable reporting a concern in this manner. It is for such circumstances that NSU has selected an external hotline provider to provide employees with an anonymous method for reporting your good faith concerns. The NSU Ethics and Compliance Hotline is toll free, anonymous, and available 24 hours, 7 days a week. The NSU Ethics and Compliance Hotline number is: **(888) 609-NOVA (6682)**.

Reports submitted via the Ethics and Compliance Reporting Hotline will be made available only to specific individuals with the university who are charged with evaluating the report, based on the nature of the asserted improper conduct. All reports will be considered and, where appropriate investigated.

No retaliatory action will be taken against any employee for reporting or inquiring about a concern that may involve improper conduct engaged in by a university employee (who is not also the reporting individual) based upon a good faith and reasonable belief that the conduct has both occurred and is wrongful under applicable law, regulation, and/or university policy.

### Additional References

- [Nova Southeastern University Ethics and Compliance Hotline](#)
- [Non-Retaliation Policy](#)

## Failure to Comply with the Code

Each employee is responsible for ensuring that their own conduct fully complies with this Code.

Raising such good faith concerns is a service to the university and does not jeopardize one's position or employment. Confirmed violations

will result in appropriate disciplinary action up to and including discharge from employment. Disciplinary action will be taken in accordance with the applicable procedures in the Faculty or Employee handbooks. Conduct representing a violation of this policy may, in some circumstances, also subject an individual to civil or criminal charges and penalties.



## Living by Our Values

### Vision

By 2025, NSU will be recognized as a preeminent professional-dominant doctoral research university that provides competitive career advantages to our students and produces alumni who serve and lead with integrity.

### Mission

The mission of NSU, a selective doctoral research university, is to deliver innovative academic programs in a dynamic, lifelong learning and research environment fostering integrity, academic excellence, leadership, and community service through engaged students, faculty, and staff.

### Core Values

#### Academic Excellence

Academic Excellence is the provision of the highest quality educational and learning experiences made possible by academically and professionally qualified and skilled instructional faculty and staff, opportunities for contextual learning, state-of-the-art facilities, beautiful surroundings, and effective resources necessary to support learning at the highest level. Additionally, academic excellence reflects the successful relationship between engaged learners and outstanding instructional faculty and staff.

#### Student Centered

Students are the focus of institutional priorities, resource decisions, and planning. We are stewards of student needs and advocates for student academic success and professional development.

#### Integrity

Integrity involves honesty and fairness, consistency in instruction, ethics of scholarship, freedom of inquiry, and open and truthful engagement with the community through effective communication, policies, and practices.

#### Innovation

Innovation is the creative and deliberate application of teaching, research, scholarship and service for effective education, and the development of useful products or processes providing a value added to the community.

#### Opportunity

Opportunity fosters the possibility for anyone associated with NSU to acquire an education or an educational experience through creative, yet sound pedagogical programs.

#### Scholarship/Research

Research and scholarship products are disseminated and evaluated through intellectual discourse, application, assessment, and other mechanisms of the relevant peer community.

#### Diversity

Diversity includes, but is not limited to, race, ethnicity, culture, religion, philosophy, gender, physical characteristics, socioeconomic status, age, and sexual orientation. It also includes differences in views, interpretations, and reactions, with mutual respect for all. Diversity makes NSU a stronger university and enriches a learning environment focused on preparing individuals to live and work in a global society.

#### Community

NSU is a community of faculty, staff, students and alumni that share a common identity and purpose who engage with the university's external community through diverse services, clinical programs, and community-based research and resources. Our community extends into professional, intellectual, as well as geographical domains that both support and are the focus of our educational mission.





## Code of Ethical Conduct Principles

NSU has always been, and remains, committed to conducting its business with integrity. The university must strive at all times in its dealings, including its business activities, to maintain the Code of Ethical Conduct Principles (“Principles”) and the highest standards of quality and integrity.

## Integrity of Business Practices

NSU is committed to honest and ethical behavior and conducting our business with integrity. The practice of behaving honestly, ethically, and with integrity is an individual responsibility. Each employee is expected to conduct the business of the university in accordance with the core values and the Code, exercising sound judgment and serving the best interests of NSU and the NSU community.

## Individual Responsibility and Accountability

Employees are expected to exercise responsibility appropriate to their position and delegated authorities. They are responsible to each other, NSU and the NSU community both for their actions and their decisions not to act.



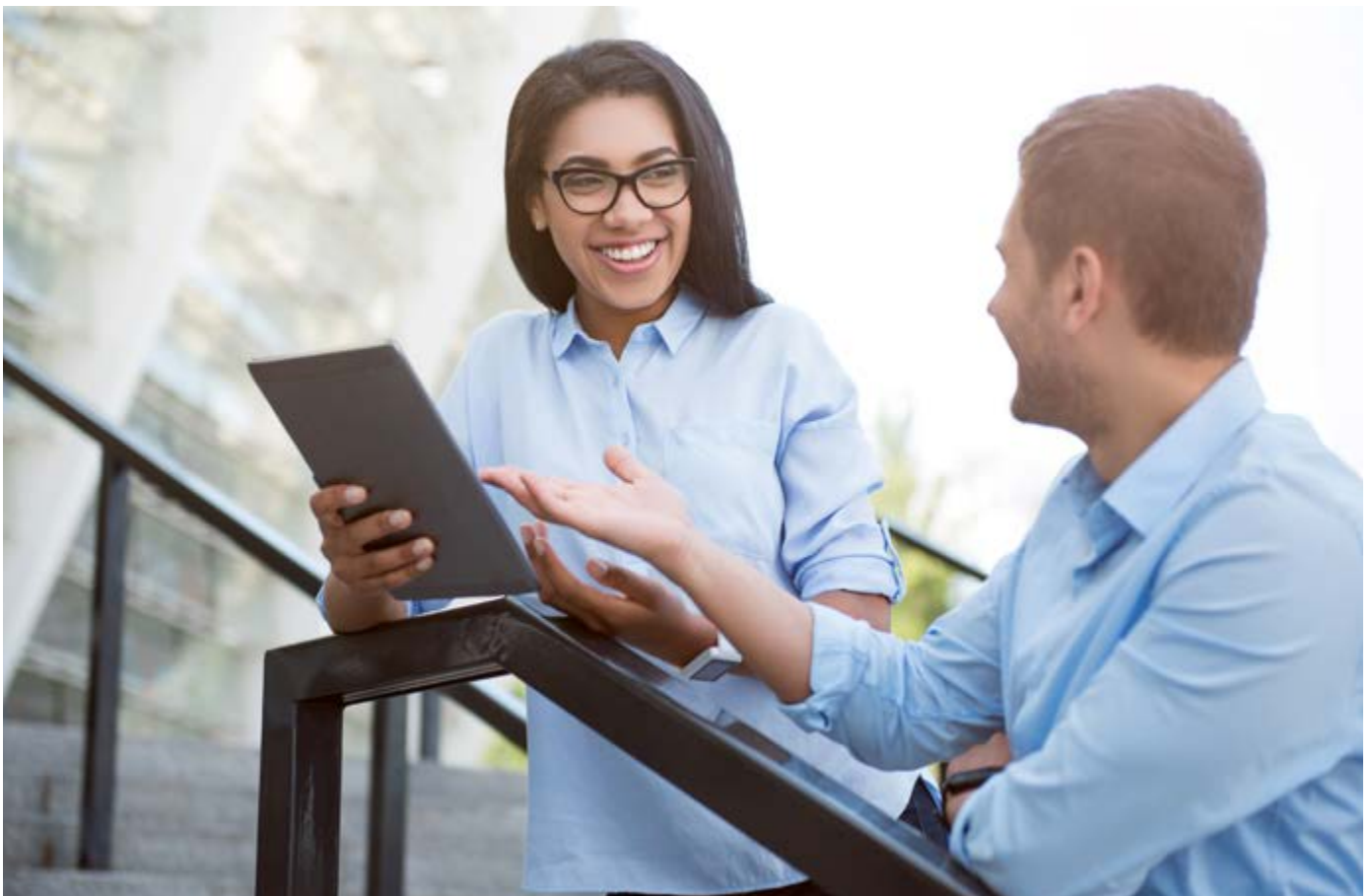
## Respect for Others

NSU is committed to a work environment in which all individuals are treated with respect and dignity.

Individuals have the right to work in a professional atmosphere that promotes equal employment opportunities and prohibits discriminatory practices, including harassment. All relationships among individuals in the workplace are to be business-like and free of bias, prejudice, and harassment.

## Additional References

- [Employee Policy Manual](#)
- [Faculty Policy Manual](#)
- [NSU Equal Employment and Nondiscrimination Policies](#)
- [Policy on Title IX: Sexual Misconduct](#)
- [Non-Retaliation Policy](#)





## Compliance with Applicable Laws and Regulations

Institutions of higher education are subject to many of the same laws and regulations as other organizations. There are also additional requirements unique to higher education.

Employees are expected to become familiar with the laws and regulations bearing on their areas of responsibility. Many but not all legal requirements are embodied in university policies. Failure to comply can have serious adverse consequences both for the employee and for the university, in terms of reputation, finances, and the health and safety of the community.

University business is to be conducted in conformance with legal requirements, including contractual commitments undertaken by employees authorized to bind the university to such commitments.

NSU's Legal team has the responsibility for interpretation of legal requirements. NSU's Legal team consists of the Office of Legal Affairs and Outside General Counsel.





## Compliance with Applicable University Policies, Procedures, and Other Forms of Guidance

University policies and procedures are designed to inform employees of his/her everyday responsibilities, to set minimum standards and to give employees notice of expectations.



### Expected Behaviors

NSU employees are expected to:

- Transact all university business in conformance with policies and procedures and accordingly have an obligation to become familiar with those that bear on their areas of responsibility.
- Seek clarification on a policy or other university directive he or she finds to be unclear, outdated, or at odds with university objectives. It is not acceptable to ignore or disobey policies if one is not in agreement with them, or to avoid compliance by deliberately seeking loopholes.

In some cases, NSU employees are also governed by ethical codes or standards of their professions or disciplines – some examples are attorneys, and health care providers. It is expected that those employees will comply with applicable professional standards in addition to laws and regulations.



## Conflict of Interest and Conflict of Commitment

NSU allows and encourages employees to engage in outside activities and relationships that enhance the mission and reputation of the university, facilitate professional and personal development, and promote education and shared knowledge.

All employees are to act according to NSU's [core values](#) with honesty, integrity, and in the best interest of the university when performing their duties and to abide by the highest standards of research, educational, professional, and fiscal conduct.

Given outside employment or consulting, public service, pro bono work, or serving as a board member or officer of another entity, even without compensation, can result in actual or potential conflicts with an employee's primary obligation/commitment to the university, disclosure ensures a proper balance of interests. All employees (exclusive of adjunct faculty) must arrange their outside obligations, financial interests, and activities so as not to interfere with their primary obligation and overriding commitment to the university.

Failure to disclose an actual or potential conflict of interest may result in disciplinary action, up to and including termination.

### Additional References

NSU has implemented Conflicts of Interest policies governing other key areas of the university enterprise. Please consult the following policies and resources:

- **Academic Affairs:** [Appointment and Review of Part-Time Faculty – Conflict of Commitment](#)
- **Institutional Review Board Policies and Procedures:**  
[Part III: Investigator Responsibilities: Financial Conflict of Interest Policy](#)
- **Office of Procurement Management Policies and Procedures:**  
[Conflict of Interest and Gratuities](#)  
[Conflict of Interest Disclosure: Supplier Registration Form](#)
- **Research and Technology Transfer:**  
[Financial Conflicts of Interest Policy & Financial Interest Disclosure Forms](#)



### Expected Behaviors

- Take appropriate steps, including consultation if issues are unclear, to avoid both conflicts of interest and the appearance of such conflicts.
- Employees should avoid any personal or business relationships, dealings or investments that create a personal interest that conflicts with the best interest of the university. A potential conflict situation can arise when an employee, officer, director, manager, administrator, or supervisor takes actions or has interests that may make it difficult to perform university work objectively and/or effectively.

## Ethical Conduct of Research

NSU is committed to lawfully and ethically conducting its research activities. Employees engaged in research are expected to conduct their research with integrity and follow all applicable state and federal regulations along with university policies and procedures.

NSU strives to provide an open and stimulating environment where creativity and individual thought flourish and where an employee may work independently and productively. The university promotes the highest standards of scientific and scholarly conduct in the research process. In this regard, NSU is committed to preventing misconduct in research.



### Expected Behaviors

- Report observed, suspected, or apparent research misconduct; and
- Cooperate with the university officials assigned to the review of allegations and the conduct of inquiries and investigations.

### Additional References

- [NSU Research Misconduct Policy](#)



## Carefully Manage Public, Private, and Confidential Information

NSU employees are the creators and custodians of many types of information. The public right to information access and the individual's right to privacy are both governed by state and federal law, as well as by university policies and procedures.



### Expected Behaviors

To meet these responsibilities, employees are expected to:

- Learn and follow laws and university policies and agreements regarding access, use, protection, disclosure, retention, and disposal of public, private, and confidential information;
- Follow document preservation and retention guidelines; and
- Maintain data security using electronic and physical safeguards (i.e., do not share passwords).





## Accuracy, Retention, and Disposal of Documents and Records

Adherence to NSU's Records Management and Destruction Policy is central to the integrity of university business practices.

Pursuant to the NSU Records Management and Destruction Policy, all NSU employees are responsible for maintaining the integrity and accuracy of university documents and records in order to comply with regulatory requirements, and to utilize reasonable efforts to ensure that records are readily available to defend university business practices and actions.



### Expected Behaviors

- Employees should not make unauthorized revisions or falsify information on any university record or document.
- Additionally, all university records and documents, including business and health care records, should be retained in accordance with applicable law and NSU's Records Retention Schedule, and should only be destroyed in accordance with the procedures outlined in the Records Management and Destruction Policy.
- Further, no NSU employee may remove a university record or document from the premises or use such records or documents for personal or unauthorized use. This prohibition applies to records or documents created by an NSU employee, faculty member, or student.

### Additional References

For more information regarding what types of documents that constitute a "university record," as the procedures related to the management, retention, or destruction of such records, and applicable records retention time periods, please review:

- [NSU Records Management and Destruction Policy](#)
- [NSU Records Retention Schedule](#)

Any NSU employee with questions pertaining to NSU's Records Management and Destruction Policy or Records Retention Schedule should contact the NSU Office of Records Management.

## Integrity of Financial Reporting

Applicable employees should ensure that assets and liabilities are accounted for properly in compliance with all tax and financial reporting requirements, Generally Accepted Accounting Principles, and established NSU accounting and financial policies.



### Expected Behaviors

- All financial reports, accounting records, research records, expense accounts, time sheets, and other documents should accurately and clearly represent the relevant facts or the true nature of a transaction.
- Additionally, all items of income and expense and all assets and liabilities should be fully and accurately entered on the financial records of NSU.
- Employees should also ensure that no false or artificial records are generated, and that there are no unrecorded NSU assets. All reports submitted to governmental authorities should be accurately prepared, all transactions should be executed in accordance with management's authorization, and access to assets should be permitted only in accordance with such authorization.

Improper or fraudulent accounting, documentation, or financial reporting, or reporting that is intended to hide, obfuscate, or mislead, is contrary to university policy and is strictly prohibited. Any employee who knows or has reason to believe that a transaction is not recorded in compliance with the listed requirements should promptly report such matter to NSU's Vice President for Finance and Chief Financial Officer.

### Additional References

NSU's employees are responsible for reviewing and abiding by:

- [NSU's Accounting Policies and Procedures](#)

## Control of University Funds

Each applicable NSU employee should monitor the commitment and expenditure of NSU funds by persons under his or her supervision. Each NSU employee should utilize reasonable efforts to ensure that any expenditure or transfer of such funds is accurate and made for a valid business purpose, upon proper authorization, and to the recipient indicated in NSU records.

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## Records: Confidentiality/ Privacy and Access

The university is the custodian of many types of information, including that which is confidential, proprietary, and private. Employees who have access to such information are expected to be familiar and to comply with applicable laws, university policies, directives, and agreements pertaining to access, use, protection, and disclosure of such information. Computer security and privacy are also subject to law and university policy.



## Internal Controls

Internal controls are the processes employed to help ensure that the university's business is carried out in accordance with these Principles, university policies and procedures, applicable laws and regulations, and sound business practices.

Internal controls help promote efficient operations, accurate financial reporting, protection of assets, and responsible fiscal management. All employees of the university are responsible for internal controls. Each business unit or department head is specifically responsible for ensuring that internal controls are established, properly documented, and maintained for activities within their jurisdiction. Any employee entrusted with funds, including but not limited to principal investigators, is responsible for ensuring that adequate internal controls exist over the use and accountability of such funds.



## University Resources

University resources may only be used for activities on behalf of the university.

They may not be used for private gain or personal purposes except in limited circumstances permitted by existing policy where incidental personal use does not conflict with and is reasonable in relation to the university duties (e.g., telephones).



### Expected Behaviors

Employees of the university are expected to:

- Treat university property with care; and
- Adhere to laws, policies and procedures for the acquisition, use, maintenance, record keeping and disposal of university property.





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