UNIVERSITY OF DENVER	UNIVERSITY OF DENVER POLICY MANUAL CODE OF CONDUCT	
Responsible Department: Human Resources and Inclusive Community **Recommended By:** VC for People and Culture, Provost, SVC Business and Financial Affairs **Approved By:** Chancellor	**Policy Number** HRIC 3.10.080	**Effective Date** _/___/2026

I. INTRODUCTION

A. This Policy establishes the ethical, professional, and legal standards of conduct applicable to University Personnel.

B. This Policy is grounded in the University's mission and shared values and is intended to support ethical decision making, promote a culture of integrity, and nurture a robust academic environment.

C. This Policy applies to University trustees, officers, faculty, staff, student workers, contractors, volunteers and other individuals who provide services to, or act on behalf of, the University (collectively, "University Personnel").

D. This Policy applies to all activities conducted on behalf of the University, regardless of location, jurisdiction, or work arrangement.

II. POLICY OVERVIEW

A. University Personnel must conduct University business in a manner that complies with applicable laws, regulations, contractual obligations, and University policies. University Personnel must also act with integrity, respect and responsibility, honoring the rights, safety, and dignity of others. University Personnel are individually responsible for their actions and, where applicable, for the actions of University Personnel that they supervise.

B. This Policy provides guidance regarding expected standards of conduct; however, it does not address every situation that may arise. University Personnel must exercise good judgment and seek guidance from their supervisor or HR Partner when questions arise regarding ethical or compliant conduct.

C. In situations where policies do not provide clear direction, University Personnel

should consider: (1) whether the action is consistent with the University's values and commitments; (2) whether the action creates legal, regulatory, or financial risk; and (3) whether, the action if known publicly, could undermine trust in the University among prospective or current students or their families, faculty, staff, donors, accreditors, or community partners.

III. PROCESS OVERVIEW

A. Compliance with Laws and Regulations

University Personnel must comply with all applicable federal, state, and local laws and regulations.

B. Compliance with Contractual and Grant Obligations

The University must comply with its contractual, donor, and grant obligations. University Personnel involved in administering or performing such obligations are responsible for confirming compliance with applicable terms and conditions. University Personnel with questions regarding contractual or grant requirements must raise those questions with the department's senior administrator or the officer that signed the contract or grant on behalf of the University, as appropriate.

C. Compliance with Standards of Ethics and Integrity

University Personnel must conduct themselves in accordance with high standards of honesty, fairness, respect, and integrity. University Personnel must not engage in conduct that significantly disrupts University educational programs or activities, or that a reasonable person would recognize as harassment, intimidation, or that constitutes targeted interference with others' ability to participate fully in such educational programs or activities.

D. Compliance with University Policies

University Personnel must comply with this Policy and other applicable University policies. University Personnel with supervisory authority are responsible for both their own conduct and for promoting compliance by University Personnel that they supervise.

E. Conflicts of Interest and Commitment

1. University Personnel must act in the best interests of the University. University Personnel must accurately and completely disclose where they have an actual, potential or apparent conflict and, where appropriate, recuse themselves from participating in or attempting to influence University decision making where such a conflict exists.

See University Policy RISK 3.20.060 – *Conflict of Interest*

2. All Faculty have an obligation to carry out their University responsibilities in a manner that promotes the best interests of the University.

   See applicable Office of Research and Sponsored Programs policies; PROV 3.20.061 – *Faculty Conflict of Commitment Policy*

F. Confidential Information and Data Protection

University Personnel must protect and safeguard confidential information obtained through their University roles and must comply with applicable laws, contractual obligations, and University policies governing the use, protection, and disclosure of such information. *See* University of Denver Confidentiality Obligations.

This obligation includes protecting and safeguarding personal data, research data, proprietary information, and other sensitive institutional information. University Personnel must report suspected data incidents or unauthorized disclosures in accordance with University policy. *See* University Policy IT 2.30.065- *Data Breach Protocol*.

G. Use of Technology and Artificial Intelligence

University Personnel must use University information systems, digital tools, and technologies responsibly, ethically, and in accordance with University policies.

University Personnel must not input confidential or protected University information into unauthorized external systems or artificial intelligence tools, misuse digital resources, or engage in conduct that compromises privacy, security, intellectual property, or academic integrity.

See University Policy IT 13.10.010 – *Acceptable Use*.

H. Engagement with Governmental Officials and Government Contractors

1. Government Officials

University Personnel must not give, offer, or promise anything of value to any government official for the purpose of influencing official action or obtaining an improper advantage. This prohibition applies regardless of whether the government official is in a position to influence a particular University matter. University Personnel are also prohibited from making indirect payments, facilitation payments, or attempts to route improper benefits to government officials through third parties.

2. Government Contractors and Others

University Personnel must not offer, solicit, or accept anything of value for the purpose of improperly obtaining favorable treatment from government contractors, subcontractors, or other third parties.

I. Safeguarding University Assets and Property

University Personnel are responsible for safeguarding the assets of the University.

1. University Personnel must use University resources and property solely for legitimate University purposes. University Personnel may not use, or permit the use of, University resources for personal gain, unlawful purposes, or unauthorized external benefit.

2. Complete, Accurate and Timely Recording

University Personnel who are responsible for recording University financial transactions must record such transactions accurately, completely, and in a timely manner in accordance with Generally Accepted Accounting Principles ("GAAP") and applicable grant and contract requirements. University Personnel with questions regarding accounting practices must refer those questions to the Controller's Office or the Office of Research and Sponsored Programs, as appropriate.

3. Budget Managers' Authority and Responsibility

Authority and responsibility for University resources are vested in designated Budget Managers in accordance with University Policy FINA 2.10.020 – *Budgetary Responsibility and Structure*. Budget Managers are accountable for transactions and reporting within their delegated authority.

4. Limits of Authority

Only individuals with delegated signatory authority under University Policy FINA 2.10.030 – *Limits of Authority* may enter into contractual or other obligations on behalf of the University.

J. Reporting and Investigations

1. University Personnel must promptly report suspected violations of this Policy, applicable laws, regulations, or contractual requirements through

their supervisor or through the University's Anonymous Reporting Hotline.

2. University Personnel who make reports of suspected violations must do so in good faith and based on their reasonable belief that a violation has occurred. The University strictly prohibits retaliation against individuals who report concerns in good faith, even if concerns are ultimately unsubstantiated.

3. The University will review and investigate reported concerns consistent with applicable policies. Investigations may be conducted or coordinated by and among the Office of Internal Audit, Human Resources and Inclusive Community, the Office of General Counsel, the Office of Civil Rights and Equal Opportunity, or another appropriate internal or external resource.

4. University Personnel must cooperate fully with audits, investigations, and inquiries conducted on behalf of the University, unless requiring cooperation violates another University policy, local, state, or federal law or regulation.

K. Violations

Where University Personnel are found to have violated this Policy, the University may take appropriate corrective action in accordance with applicable University policies and procedures.

IV. DEFINITIONS

None

Revision Effective Date	**Purpose**
	Policy approved and added to the Policy Library