

Statement of Purpose

Columbia University is a world-class university dedicated to teaching, research, and clinical care. In addition to all of the students and faculty that compose the Columbia community, thousands of staff members are also members of that community. Columbia is not only a place where students, faculty, researchers and clinicians come to do their best work, but also a place where thousands of staff members come to do their best work to advance the various missions of the University.

It is, therefore, essential to promote an environment that allows everyone who is a part of the Columbia community to do their best work, be respected, and have as positive an experience as possible at the University. These expectations are in alignment with the University's high ethical standards and with its goal to continually improve, maintain its status as a world-class university and be an employer of choice.

This policy has been developed to promote the environment of respect that is central to success of the University and the individuals who work here. The policy articulates the principles that govern interactions at the University and some of the basic expectations that flow from those principles. There are a number of policies that cover specific interactions and situations. This policy does not replace those policies; it provides a framework for them. While this policy does articulate a basic set of expectations and provides examples to articulate some of these expectations, neither is meant to be comprehensive.

Who Is Governed By This Policy

As a statement of principles based on the values of the University, this document can certainly provide sound advice and direction for all interactions between all members of the Columbia community. As a University policy, it specifically applies to Officers of Administration, people applying to the University to be Officers of Administration, and vendors working on behalf of Officers of Administration.

The guiding principle in this document is respect and the primary goal is the promotion of a positive working environment. Both of these values are community values and, therefore, are the responsibility of everyone. Regardless of the role someone plays at the University or the level he or she has in an organizational hierarchy, each person has a responsibility to adhere to these principles and promote a positive working environment. Regardless of whether someone is working full time, part time, on a temporary basis or as a contractor working on campus for part of a day, each person is expected to adhere to these values and promote a positive working environment.

Statement of Principles to Guide and Govern Interactions

There are four basic principles that guide and govern interactions at the University and promote a positive working environment: respect for governance; respect for others; respect for information; respect for property.

Respect for Governance

Respect for governance is the expectation that members of the Columbia community will act in compliance with the laws, regulations and policies that are in effect and govern behavior at the University and the conduct of University business.

Whether physically on campus or conducting University business, members of the University administration are expected to comply with all City, State and Federal laws. When a member of the University administration is in another country on University business, they are also expected to act in compliance with all relevant laws.

Columbia University conducts a significant amount of research that is funded by government agencies and private foundations. As a result, a number of rules and regulations govern activities — both for people working directly under grants and contracts and, often, for everyone conducting research and research-related activities. Members of the University administration are expected to act in accordance with these rules and regulations to maintain the highest standards of compliance and fulfill their roles as stewards of these important relationships and resources.

Columbia University is a nonprofit institution and is, therefore, also subject to federal and state rules that govern nonprofit institutions. The University's status as a tax exempt organization is central to its mission and financial well being. Members of the University administration are expected to comply with all rules and regulations pertaining to nonprofit

organizations that apply to the University and to act as stewards of the trust entailed in the nonprofit designation.

There are a significant number of laws, regulations, and policies that govern business at the University. Members of the University administration are expected to become familiar with these laws, regulations and policies and are also expected to seek out clarifications when they are not certain about the presence of a governing law, regulation or policy, or have a question about one or more of them.

A respect for governance guides one's own behavior. It is also essential for a community and for a positive working environment. It is, therefore, the responsibility of everyone not to tolerate disregard for and noncompliance with laws, regulations, and policies. Members of the University administration are expected to seek clarifications about possible noncompliance and to report actual and possible violations of laws, regulations and policies. The University has set up a number of mechanisms for inquiry and reporting, is committed to protecting confidentiality, and prohibits any form of retribution against people for reporting violations.

At the end of this document is a list of referrals and policies that can help people understand the resources at their disposal.

Respect for Others

Respect for others is the central principle that governs interactions between people at Columbia University. A primary expectation that flows from this principle is civility and a refrain from abuse of power. Respect for others is expected in

peer-to-peer relationships, between service providers and people within and outside of the Columbia community, between people who are clients or customer and service providers at the University, and within a supervisory context (e.g. manager-to-employee and employee-to-manager).

Respect extends to those people who are contractors doing work on behalf of the University. Respect also extends to the University's neighbors in interactions that members of the University community have with Columbia's neighbors.

Respect should be present in verbal and written communications. Respect should be shown at meetings, on the telephone and in electronic exchanges.

People have the right to disagree, even strongly disagree; however, there is also a responsibility to be civil and to maintain respect even while disagreeing. Problems, mistakes, miscommunications can all arise from time to time in the course of business, and could even call for the escalation of seriousness of attention to a situation. Again, there still remains the expectation of respect and civility in interactions.

Respect for others includes a respect for others who are different from you. A positive working environment where everyone can receive respect and do their best work requires a respect and tolerance for difference and diversity.

Respect for Information

Officers of Administration, by the nature of their position and responsibilities, often have access to information that is confidential, sensitive, and/or personal. In addition to

adhering to the rules and regulations that govern the proper handling of information, everyone is expected to respect the privacy of others by respecting the information that pertains to others.

Business at the University can involve sensitive matters, livelihoods, professional reputations and, of course, the reputation of the University itself. People are expected to manage their access to information responsibly and in a manner that respects all of these things. People also are expected to seek clarification and confirmation of information that comes to them, particularly if it seems inconsistent or questionable, so as not to misrepresent a situation or contribute to a misrepresentation or misunderstanding.

Respect for Property

Officers of Administration act as stewards of University property. Property includes physical assets, intellectual property, the University name, and other resources. As a nonprofit organization, largely supported by gifts, donations, government and foundation grants, it is essential to maintain the highest standards of stewardship for the property and resources entrusted to us. Respect for property, therefore, entails both the efficient use and appropriate use of University assets and resources. Members of the University administration are expected to do nothing that would jeopardize the University's reputation or standing with donors, grantors, or the many people who provide hard-earned resources to the University in order to educate members of their family or themselves.

Statement of Ethical Conduct

The University has also issued this statement regarding ethics:

Columbia University expects all officers of instruction, administration and research, support staff and students to maintain the highest standards of ethical conduct.

Columbia University is one of the world's most important centers of research and at the same time a distinctive and distinguished learning environment for undergraduates and graduate students in many scholarly and professional fields. The University recognizes the importance of its location in New York City and seeks to link its research and teaching to the vast resources of a great metropolis. It seeks to attract a diverse and international faculty and student body, to support research and teaching on global issues, and to create academic relationships with many countries and regions. It expects all areas of the University to advance knowledge and learning at the highest level and to convey the products of its efforts to the world. That commitment upholds the reputation of the University, both locally and globally, and encourages compliance with applicable laws and regulations.

Principles:

The basic principles of Ethical Conduct are:

1. Be honest, ethical and truthful;
2. Obey the law. If you are uncertain about what the law or applicable regulations require, seek assistance from your supervisor; and

3. Follow University policies and procedures. Make sure you understand your responsibilities. If you have questions about specific issues, you should ask your supervisor. University policies and procedures may be found on the University website.

Procedures:

1. Report conduct that concerns you. If you believe that an activity may be illegal, unethical or otherwise troubling, you should report it to your supervisor. If your supervisor is involved in the questioned conduct, you should discuss it with the person at the next supervisory level. You could also discuss your concerns with an ombuds officer or report the conduct to the "hotline" or other responsible administrative officer. Reports may be made anonymously. University employees may not retaliate against you for any good faith report of improper activity.
2. An individual's failure to live up to these principles may result in disciplinary action, including suspension, termination, and monetary fines consistent with University policy. For violations of applicable laws, individuals may also face criminal and civil penalties, including monetary penalties.

Additional Administrative Policies

Additional and more detailed and explicit policies may govern particular areas of administration such as human resources, finance, information technology or facilities. It is the responsibility of each person working in those areas to learn and adhere to those policies.

Additional Resources

There are a number of resources to assist in learning about and understanding University policies and laws and regulations that govern life at the University.

Columbia University Administrative Policy Library

In 2006, Columbia University launched its Administrative Policy Library. The library is a repository for the policies administered by the departments that report to the Senior Executive Vice President, which include:

- Accounts Payable
- Benefits
- Office of Management and Budget
- Compensation
- Facilities
- Information Technology
- Human Resources
- Employee & Labor Relations
- Controller
- Payroll
- Public Safety
- Purchasing
- Restricted Funds
- Student Services

- Treasury

In addition, several other departments have also included their administrative policies in the library, including:

- Development and Alumni Relations
- Equal Opportunity and Affirmative Action

The administrative policy library is designed to provide easy access to administrative policies at the University by providing a single location, an ability to browse policies by several means (alphabetically and by Responsible Office), an ability to search by key words, and a contact listed in each policy for follow up inquiries.

Many policies will include links to related procedures and to other, related policies. The library also provides links to other policy resources at the University, beyond administrative policies, including:

- Faculty Handbook
- Student Handbook (Facts About Columbia Essential To Students)
- Columbia University Libraries
- Environmental Health & Safety

In January 2006, the University adopted a new, standard format for administrative policies, ensuring consistent inclusion of essential information. In addition, a new development and approval procedure was established for administrative policies, including review by the General Counsel's Office and an administrative review committee, and approval by the General

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Counsel, Executive Vice President for Finance and Executive Vice President for Student and Administrative Services. Once completing this process, new or revised policies are then published to the Administrative Policy Library.

The Administrative Policy Library is located on the Columbia University website at:
www.columbia.edu/cu/administration/policylibrary/index.html

How to get clarifications

The first recommended resource for a clarification on a policy, regulation or law is one's direct supervisor. If a direct supervisor cannot serve as a resource, other resources to consult include the Compliance Hotline, Human Resources Employee Relations, the Office of the General Counsel, the Office of Research Compliance and Training, and the University Ombuds Office.

Compliance Hotline

The University Compliance Hotline is a confidential channel always available for employees to report or seek guidance on incidents of financial impropriety. It enhances the set of existing services and channels at the University that support and foster the values of integrity and compliance.

The Compliance Hotline is a new tool in the University's sustained effort toward:

- o Stronger financial controls
- o Enhanced risk management and compliance

- o Increased protections for members of our community

It seeks to foster:

- o Communication and transparency
- o Exchange of concerns regarding unethical behavior
- o Seeking of clarification
- o Reporting of troubling issues or practices

The Hotline focuses on the following areas:

- o Fraud and financial improprieties
- o Research misconduct
- o Conflicts of interest
- o Breaches of confidentiality or destruction of information
- o Discrimination or harassment

The University's Compliance Hotline is a "best practices" hotline provided by a third party and staffed by professionals. It is available to Columbia staff through the telephone and the internet, with confidential intake and report handling, and the option to report anonymously:

Phone: (866) 627-3768

<https://www.submitreport.com/columbiauniversity.jsp>

HR Employee Relations

Office of the General Counsel

Office of Research Compliance and Training (EVP for Research):

- Institutional Policy on Misconduct in Research
- Members of the Standing Committee on Conduct of Research
- Office of Research Compliance and Training:
(212) 854-8123

University Ombuds Office

The Ombuds Office is a resource for seeking guidance. The Ombuds office is informal, and not a place to make a formal report or initiate a formal investigation. But the Ombuds office is place where you can get more information about your options, and how the University's procedures and reporting channels function. The ombuds officers will office guidance to help you choose how you wish to report your concerns.

The Ombuds Office can:

- Help come up with creative or "custom-made" options for unusual, complex or unique situations
- Help you plan for preventing retaliation, or responding to any aspects of the situation

The Ombuds Office website address is:

<http://www.columbia.edu/cu/ombuds/>

Rights and responsibilities regarding violations

Guidance in the event of a violation of policies, regulations or laws tends to be situation specific. Important initial resources include:

- Compliance Hotline
- University Ombuds Office