INTER AMERICAN UNIVERSITY OF PUERTO RICO CODE OF CONDUCT

NORMATIVE DOCUMENT G-0909-031R

Introduction

Inter American University of Puerto Rico is committed to carrying out its mission, including its academic, administrative, and fiscal operations, in accordance with high ethical standards and in full compliance with all applicable laws and regulations as well as institutional norms. Consistent with this commitment, the University administration is issuing this Code of Conduct in order to instruct its directors, officers, employees, including faculty, students and agents on what it expects and requires from every University member regarding ethical and legal conduct.

This Normative Document is published in Spanish and English. In the event of a conflict as to its interpretation, the Spanish version shall prevail.

I. Legal base

This Document is promulgated by virtue of the authority conferred to the President by the Board of Trustees in the Statutes of the University.

II. Purpose

This Code of Conduct contains the University's compliance standards and expectations and is intended to be an everyday guidance tool in the expected performance of a member's work. It will help tell right from wrong within the University and contains practical information and resources that may be used if confronted with a potential compliance issue.

It is hoped that this Code is sufficiently clear so it may be easily understood and used. Nevertheless, it may contain complex matters, which have been summarized, so that only a general knowledge is presented herein. All members are invited to use the mechanisms provided in this document to clarify any doubt they may have on these matters.
III. Applicability

This Code applies to the entire academic community: employees, faculty, students and the Board of Trustees.

IV. Definitions

4.1 University community – directors, officers, employees, faculty, students, Board of Trustees and agents.

4.2 Institutional compliance office – office responsible for the compliance program. It promotes compliance with the laws, regulations and the internal and external norms applicable to the activities conducted by the University.

4.3 Compliance hot line – telephone line (787.728.6753) to clarify doubts on compliance matters with legal and ethical provisions, as well as to receive information on alleged infractions to these provisions.

4.4 President – the President of Inter American University of Puerto Rico, Inc.

4.5 University or Institution – Inter American University of Puerto Rico, Inc.

V. Implementation

5.1 Condition of employment – The principles found in this Code reflect the core values of the University and its commitment to comply with ethical and legal norms. All members of the University community are expected to follow these norms in the performance of their daily tasks. Therefore, compliance with this Code is a condition of employment at the University.

5.2 All members of the University community have the responsibility to read, understand, and comply with this Code and to know the laws, regulations and institutional norms applying to their work area.

5.3 Persons having doubts regarding this Code, are invited to consult their immediate supervisor or Chief Compliance Officer (see Section VII below), or refer to the appropriate policy or procedure.
VI. Current University policies and regulations

6.1 Compliance with applicable statutes and regulations

All members of the university community have the obligation to observe the laws and regulations that constitute the legal framework within which University tasks are carried out. This legal framework is inclusive and covers matters such as the guidelines that regulate projects subsidized by external funds, in particular federal funds, and matters dealing with labor rights, the environment, taxes, security and occupational health and fraud. The breach of any of these norms may subject the University and the person that incurs in improper behavior to administrative, civil and criminal sanctions.

The current institutional norms related to this section are the following:

- Normativa Institucional contra el Fraude (Documento Normativo F-1106-012) (Spanish version only)
  http://www.inter.edu/documentos/doc_normativos/F-1106-012.pdf
- Código de Conducta Institucional – Programa de Préstamos Estudiantiles (Spanish version only)
  http://www.inter.edu/documentos/doc_normativos/ccippe.pdf

6.2 Human resources

The University recognizes that each member of the University community is its most important resource to achieve excellence and to fulfill the institutional mission. The University values academic freedom, and diversity and respect among the members of the university community. The University is committed to eradicate all types of discrimination and maintains a policy of no tolerance towards sexual harassment.

The current norms in the area of human resources are the following:

- Manual de la Facultad (Spanish version only)
- Manual del Personal no Docente (Spanish version only)
- Manual de la Facultad a Jornada Parcial (Spanish version only)
- Normas y procedimiento para la atención de querellas del personal no docente (Carta Circular G-142-92) (Spanish version only)
- Reglamento Interno para atender querellas sobre hostigamiento sexual en el empleo y en la academia (Documento Normativo G-0306-023) (Spanish version only)
  http://www.inter.edu/documentos/doc_normativos/G-0306-023.pdf
• Política de igualdad de oportunidades en el empleo (Carta Circular G-126-91) (Spanish version only)
• Política institucional para cumplir con las disposiciones de ley que prohíben el discrimen contra personas con impedimento (Carta Circular G-145-92) (Spanish version only)

0.3 Conflict of interest

Members of the University community have the obligation to always put the University first in the performance of their tasks. This performance must be realized free of all real or imaginary conflict and each individual has the personal responsibility of being on the lookout to avoid any type of action that could be considered in conflict with the main obligation of fidelity to the University. The conflict occurs when an interest, activity or relation with a third party influences or appears to influence the manner of carrying out one’s responsibilities with the University. That is to say, that it prevents putting the interests of the University first.

This Code does not try to describe all situations that could represent a potential conflict of interest. For example, these situations represent conflicts of interest when 1) a member of the university community has interests in an organization that conducts business or competes with the University; 2) a member of the university community benefits a relative or close friend by granting them contracts or employment.

The current institutional norm related to this section is the following:

• Gúias y normas sobre conflictos de intereses (Documento Normativo F-C207-013) (Spanish version only)

6.4 Responsible conduct in research

The University has the responsibility to see to it that the research projects are conducted with highest integrity and in strict compliance with the applicable federal and state laws and regulations as well as with institutional norms.
The current institutional norms related to this section are the following:

- Procedimientos para atender alegaciones y casos de conducta impropia en actividades de investigación (Procedures for dealing with allegations and cases of misconduct in research activities) (Documento Normativo A-0106-20)
- Política y normas sobre la protección de los derechos de los sujetos humanos que participan en proyectos de investigación (Inter American University of Puerto Rico Policy and Norms Regarding the Protection of Human Subjects in Research) (Documento Normativo A-IRB-013-2000R)

6.5 Safety and occupational health

The University is committed to protect the health and safety of the University community and to maintain a safe work environment. To accomplish this end, University members are expected to act with good sense in their work area and become familiar with the regulation requirements in this matter so they may contribute to preserve a safe work environment.

The current institutional norm related to this section is the following

- Políticas y normas para el programa de seguridad y salud ocupacional de la Universidad Interamericana de Puerto Rico (Documento Normativo G-RH-016-2000) (Spanish version only)

6.6 Norms dealing with privacy and confidentiality

Some members of the University community deal with confidential information in the performance of their functions. This information is related to students, employees, teaching personnel, managerial personnel, alumni, donors, research sponsors, licensing partners, and others. It is expected that the administration of this type of information is done in accord with the law, regulations, and contractual obligations and according to institutional norms.

The current institutional norms related to this section are the following:

- Guías, normas y procedimientos para la protección de la privacidad de la información del consumidor (Documento Normativo G-0207-027)
  http://www.inter.edu/documentos/doc_normativos/G-0207-027.pdf
6.7 Appropriate conduct with respect to gifts, travel and entertainment

It is expected that the members of the University community do not receive personal gain from the position they hold and that travel expenses are realized according to institutional norms. On the other hand, any cost incurred in travel must be reasonable and not extravagant. Finally, it is totally prohibited that the members of the University community demand or receive gifts as a condition to carry out their tasks.

The current institutional norms related to this section are the following:

- Normas para gastos de viajes oficiales y desembolsos para estas actividades (Carta Circular F-165-95) http://www.inter.edu/documentos/cartas_circulares/F-165-95.pdf
- Normas para el control de gastos en reuniones y otras actividades oficiales (Carta Circular F-101-87) (Spanish version only) http://www.inter.edu/documentos/cartas_circulares/F-101-87.pdf
- Normas para el pago de obvención por concepto de gastos de representación al personal gerencial (Documento Normativo G-003-005) (Spanish version only) http://www.inter.edu/documentos/doc_normativos/G-0103-005.pdf

6.8 Finance and management

The University has the commitment to conduct its fiscal and administrative operations in a prudent manner and within the margin of the law, the regulations and all applicable institutional norms. It is the duty of every University member who participates in administrative and fiscal operations to become familiar with this legal and prescribed framework.

On the other hand, the employees of the University who are associated, directly or indirectly, to fiscal and administrative operations have the obligation to make sure that the property, funds and technology are used appropriately to
benefit the University and are within the requirements imposed by laws, regulations and institutional norms.

The current institutional norms related to this section are the following:

- **Normas sobre aprobación y firma de contratos, nombramientos y servicios profesionales (Documento Normativo F-0803-003R)**
  http://www.inter.edu/documentos/doc_normativos/F-0803-003R.pdf
- **Normas para la adquisición de materiales, equipo (incluyendo equipo computadorizado y de telecomunicaciones), programas de computadora y servicios no personales (Documento Normativo F-006-009R)**
  (Spanish version only)
  http://www.inter.edu/documentos/doc_normativos/F-006-009R.pdf
- **Reglamento para la conservación, registro y disposición de la propiedad mueble de la UPR (Documento Normativo F-PROP-004-2000R)**
  (Spanish version only)
  http://www.inter.edu/documentos/doc_normativos/F-PROP-004-200CR.pdf
- **Normas y procedimiento para preparar el presupuesto (Documento Normativo F-1006-010)**
  (Spanish version only)
  http://www.inter.edu/documentos/doc_normativos/F-1006-010.pdf
- **Normas y procedimientos para el manejo del fondo de cambio y del fondo de caja menuda (Documento Normativo F-0908-017)**
  (Spanish version only)
  http://www.inter.edu/documentos/doc_normativos/F-0908-017.pdf

6.9 Administration of governmental subsidies with external funds

The management and administration of governmental subsidies with external funds is a task that requires the uppermost rigor and strict compliance with all applicable laws and regulations as well as compliance with the programmatic commitments agreed to with the agencies that grant the subsidy. Therefore, it requires that all employee of the University that manage or administer this type of project have accurate knowledge of the legislation, regulations and applicable procedures.

This provision applies to programs such as Title IV (financial aid) as well as to proposals subsidized with external funds. The breach of any provision applicable to the management and administration of governmental subsidies with external funds will entail the imposition of the most severe sanctions contemplated in current institutional norms.
The current institutional norm related to this section is the following:

- Normas relacionadas con la obtención y administración de subvenciones gubernamentales con fondos externos (Documento Normativo A-RE-0902-003) (Spanish version only) http://www.inter.edu/documentos/doc_normativos/A-RE-0902-003.pdf

6.10 Compliance with professional standards of conduct

Some directors, officials, employees, students and agents of the University are licensed to practice professions that are regulated by codes of professional conduct (lawyers, engineers, authorized public accountants, social workers, psychologists, etc.). It is expected that these persons comply not only with the standards of conduct of the University, but also with the standards of ethical conduct that regulate the practice of their profession.

VII. Compliance resources

To assist the University and its members in adhering to this Code and in meeting their ethical and compliance obligations, the University has established a Compliance Program. This Program is organized and managed through a Compliance Office and is directed by a Chief Compliance Officer. The Compliance Program engages in a variety of activities to promote and help ensure compliance with this Code, institutional norms and all applicable laws and regulations. Among these activities are training sessions, individual guidance, and the dissemination of information regarding compliance, the conduct of monitoring and audits and investigations when necessary.

To communicate with the Chief Compliance Officer, call 787.766.1912 Ext 3547. The compliance program has an open door policy and welcomes any member of the University community who may need information or the clarification of any doubts related to this Code or the specific compliance of applicable laws, regulations or norms.

VIII. How to inform infractions or possible infractions

All members of the University community must act in an ethical and honest manner as individuals so that the highest ethical standards may be maintained and laws complied with. All persons must realize all their effort, within their abilities, so that the University may comply with its ethical and legal responsibilities. Therefore, each one has the responsibility to bring to the attention of some University officer, any suspicion that there is or has been some violation of a provision of any law, regulation or institutional norm, as well as any ethical transgression. Persons may choose to whom they want to report their concern, be it, to their direct supervisor, any other University officer, to the human resources officer of their academic unit or to the Chief Compliance Officer.
8.1 In order to attend cases when persons do not feel comfortable airing their concern to their direct supervisor or another University officer, the Institution has established a Compliance Hotline at 787.728.6753, which is available during regular working hours. This line is available to clarify doubts on compliance matters with legal and ethical provisions as well as to receive information on alleged infractions of these provisions. These calls may be anonymous if the person so wishes. Nevertheless, it must be clear that anonymous calls make the investigation process difficult since follow-up can not be given to the person providing the information. The processes to take care of the calls will be developed by the personnel of the Institutional Compliance Office.

8.2 In addition, the University has put an email address at the disposal of the members of the University community that may be used to channel the concerns related to the commission of infractions or the suspicion of the commission of an infraction.

The email address is the following:

   cumplimiento@inter.edu

Access to this email address can be had from any computer, from any place, whenever a connection to Internet is available. These communications are not anonymous.

8.3 When an allegation of a possible infraction to a legal provision or to an ethical breach is received, it will be investigated and confidentiality will be maintained to the extent permitted under the law. Information related to the investigation will only be shared with the people necessary for the investigation, so they may review and solve the situation.

Any member of the University community that makes a complaint or alleges the commission of an infraction must act in good faith and must have information of his own personal knowledge that will reasonably allow him to believe that the claim or allegation presented does indeed constitute an infraction.

8.3.1 If a member of the University community presents a complaint or makes an unfounded allegation, or if it can be proved that he presented this maliciously or with knowledge of its falsehood, he will be subject to the most severe sanctions contemplated in the institutional normative documents.
8.4 Any member of the University community having knowledge that an infraction of the law or an ethical provision is being committed and does not report it will be subject that the most severe sanctions contemplated in the institutional normative documents.

IX. Contacts

Institutional Compliance Office
PO Box 363265
San Juan, PR 00936-3255
787.766.1912 Ext. 3547
787.763.4450 (FAX)

X. Severance

If any part or section of this document is declared null by a competent authority, such decision will not affect the rest of the document.

XI. Repeal and Amendments

This document does not annul or replace the abovementioned normative documents, but rather it articulates and complements them. This document may be amended or rescinded by the President of the University.

XII. Effective date

This document will take effect upon its approval.