

Wellesley College Business Conduct Policy

Purpose

Wellesley College is committed to the highest standards of integrity, honesty, and ethical conduct in all business dealings. This policy reinforces our motto, *Non Ministrari sed Ministrare* (“not to be ministered unto, but to minister”), by ensuring that all institutional decisions and actions are taken solely to advance the College's mission of providing an excellent liberal arts education.

Scope

As members of the Wellesley community, we represent the College in everything we do. Each of us must be aware of, and conduct ourselves in the manner that preserves the assets and reputation of the College while simultaneously promoting ethical and appropriate choices.

This policy applies to all members of the Wellesley College community, including faculty, staff, trustees, and student employees acting on behalf of the College. Violation of this policy is subject to disciplinary action up to, and including, termination of employment.

Principles of Ethical Standards

A. Conflicts of Interest

Wellesley College employees have important responsibilities in connection with the work they perform for the College. Wellesley College expects that all personnel will perform their professional duties in good faith and in the best interests of the College. Employees must refrain from activities, agreements, business investments, interests, or other situations that might be perceived as conflicting with the College's interests or interfering with their professional duties to the College.

A conflict of interest exists when an employee is in a position to benefit personally, directly or indirectly, from their dealings with an entity or person conducting business with the College. All employees have an obligation to avoid conflict, or the appearance of conflict, between their personal interests and the interests of the College in dealing with outside organizations or individuals.

An individual shall be considered to have a possible conflict if either the individual, a member of their immediate family, or associates (1) has or appears to have any material, financial or other

interest which may impair the individual's judgment in carrying out the responsibilities delegated by the College, or (2) may receive a personal benefit from the knowledge of information confidential to the College. An immediate family member is defined as spouse or domestic partner, parents, siblings, children, and, if living in the same household, other relatives. An associate includes any person, organization, enterprise or trust in which the individual or members of his or her family (1) is a director, officer, employee, partner or trustee, or (2) has any material association.

All Wellesley College officers, deans, select department heads and other employees will make a disclosure to the Vice President for Finance and Administration of any reportable conflicts of interest on an annual basis. Employees are responsible for completing this disclosure electronically using the Workday System.

A *conflict of commitment* occurs when, in the course of performing external activities, an employee's ability to meet their workload and/or professional obligations to Wellesley is negatively affected.

If a person is a full-time administrative employee of the College, their primary employment responsibility is to the College. Prior to the commencement of any outside employment or consulting engagements, approval must be granted by the employee's Department Head, Division Head, and the Chief Human Resources Officer if: (a) participation may involve, or appear to involve, a conflict of interest with College responsibilities and/or (b) participation may compromise the College's relationship with an outside employer or consulting client.

Faculty should refer to the [faculty handbook](#) under the section titled "Consulting and Other Paid Work Outside the College" for the conflict of commitment policy.

Failure to disclose a reportable interest or relationship or neglecting to comply with the College's requirement for managing a determined conflict of interest, may subject the employee to disciplinary action up to, and including, termination.

B. Stewardship of Resources

College resources must be used prudently and only for their intended educational and business purposes. Each member of the Wellesley College community assumes responsibility to safeguard and preserve the assets and resources of the College, and to use them in direct service to the educational mission of the institution. All faculty, staff and students have a duty to protect the College's assets from theft, waste and misuse. The use of College funds or assets for any unlawful or improper purpose is prohibited by the College and by local, state and federal law.

To preserve the integrity of the College's non-profit 501(c)3 status, all financial transactions generated from College-related activities must be recorded and accounted for in a timely and accurate manner and with appropriate documentation regarding the business nature of the transaction.

All expenditures for goods and services must be processed through the Controller's Office. This includes vendor invoices, expense reimbursements, and payroll transactions.

College employees are prohibited from paying an individual personally for any services provided to the College with cash, check or a third-party payment app (i.e. Venmo, Zelle). Such purchases will not be reimbursed.

No bank accounts are to be established by individuals, departments, student organizations, or others acting on their behalf for the purpose of funding, or to assist in funding, any College activity.

C. Confidentiality & Data Privacy

Wellesley College entrusts faculty and staff with a variety of proprietary, private confidential information concerning colleagues, students, alumnae, donors, or others associated with the College, as well as information regarding College business.

The College must comply with state and federal regulations with respect to how confidential information is accessed, disclosed, transmitted, used, stored and disposed of with great care and only for appropriate College purposes. For additional information refer to the [Wellesley College Written Information Security Program](#).

D. Purchasing and Vendor Practices

Wellesley College faculty, staff and students must act in a fair and professional manner when engaging in commercial activities, such as purchasing goods and services for, or on behalf of, the College. Transactions should typically take place in a competitive environment, free from conflicts of interest. The College strives to have a broad pool of vendors and suppliers in order to obtain the best possible value based on quality, price, service, reliability and delivery terms. Goods and services may only be purchased by authorized individuals consistent with the [College's Purchasing Policies](#).

E. Gifts and Gratuities

While gifts from vendors, contractors and others conducting business with the College are most often given as a gesture of goodwill and appreciation, all employees should consider that gifts are generally given with the intent to influence a College business decision. Gifts made to College personnel could be in the form of entertainment, social invitations, sporting events, favors, personal property, services or discounts.

College funds can not be used to pay for celebrations or to purchase gifts for any individual in recognition of personal events such as: birthdays, weddings, births or housewarmings.

Expenses incurred in connection with expressions of professional recognition of employees are allowed only as occasional, modest expressions of support and recognition on behalf of the College. These gifts must be tangible personal property (not gift cards) and should not exceed

\$100 in value to any individual, unless approved in advance by the area division head or the president. Recognition to students can be in the forms of a tangible gift or gift card from the College Bookstore and should not exceed \$25.

Expenses incurred in connection with expressions of sympathy or support toward employees and students are allowed at a modest level, not to exceed a value of \$200, and with a limit of one gift per occasion. Examples of such support would include: death, serious illness or hospital stays for employees, students, or immediate family members.

Employees may not accept gifts of more than a token or nominal value, generally defined as being worth \$100 or less. All gifts must be reported to the employee's supervisor before a gift is accepted. College funds are not allowed to be used to make gifts to charitable organizations.

F. Workplace Environment

Wellesley College is dedicated to maintaining a safe, inclusive, and respectful workplace environment. The College strives to provide the faculty, staff and students with a work environment that is free of discrimination, harassment or other unreasonable interference with the performance of their College duties. We aspire to be a community of colleagues in which mutual respect guides our day-to-day interactions. While the College affirms an individual's right to self-expression, it expects that the rights and concerns of others who work at Wellesley are respected as well. At Wellesley, there is no place in the work environment for conduct that demeans or belittles another person. For these reasons, harassment of any kind is unacceptable and subject to disciplinary action.

Detailed employment policies, procedures and benefits can be found in the following employee handbooks.

[Wellesley College Administrative Employee Handbook](#)

[Wellesley College Faculty Handbook](#)

G. Whistleblower Policy

The College has adopted a Whistleblower policy for employees to report a concern of financial wrongdoing outside of the traditional reporting mechanism. [The Whistleblower Policy](#) allows allegations to be made outside of the immediate area of which the suspected employee is associated.

H. Compliance with Laws

All business activities must be conducted in full compliance with applicable federal, state and local laws. When the application of a law is uncertain, employees should consult the Office of General Counsel.

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