

## **University of the Incarnate Word School of Osteopathic Medicine Confidentiality and Conflict of Interest Policy and Disclosure Form**

### **Confidentiality**

As an employee, I recognize that I owe a fiduciary duty of care to the University of the Incarnate Word School of Osteopathic Medicine (UIWSOM). This includes a duty of confidentiality. All information and documentation that I receive from UIW and UIWSOM and others in connection with my service to UIW will be treated with strict confidentiality. Neither the contents nor the existence of this information or documentation will be shared with anyone other than those within the organization need to know. I will direct any questions regarding my confidentiality obligations to the UIWSOM Dean or UIW Department of Human Resources (HR).

### **Conflicts of Interest**

As an employee of UIW, I recognize that I owe a fiduciary duty of loyalty to UIW and UIWSOM. This duty requires me to avoid conflicts of interest and to act at all times in the best interests of UIW and UIWSOM. The purpose of the conflicts of interest policy set forth in the UIW Employee Handbook is to help inform UIW employees about what constitutes a conflict of interest, assist them in identifying and disclosing actual and potential conflicts, and help ensure the avoidance of conflicts of interest where necessary. This policy may be enforced against UIWSOM employees as described below:

1. UIWSOM employees have a fiduciary duty to conduct themselves without conflict to the interests of UIWSOM. In their capacity as employees, they must subordinate personal, individual business, third-party, and other interests to the welfare and best interests of UIWSOM.
2. A conflict of interest is to conduct, a transaction or relationship that presents or might conflict with an employee's obligations owed to UIWSOM and his/her personal, business or other interests.
3. All conflicts of interest are not necessarily prohibited or harmful to UIWSOM. However, full disclosure of all actual and potential conflicts, and a determination by the disinterested Chairs and Deans Council members – with the interested employee(s) recused from participating in debates and voting on the matter – are required.
4. All actual and potential conflicts of interests shall be disclosed by employees to the Deans Council through the annual disclosure form and/or to the Council whenever a conflict arises. Disinterested members of the Deans Council shall make a determination as to whether a prohibited conflict exists and what subsequent action is appropriate (if any). The Dean shall inform HR and UIW Legal Counsel of such determination and action. Upon review by the UIW Legal Counsel, UIW shall retain the right to modify or reverse such determination and action,

and shall retain the ultimate enforcement authority with respect to the interpretation and application of this policy.

5. On an annual basis, all employees shall be provided with a copy of this policy and required to complete and sign the acknowledgment and disclosure form below. All completed forms shall be provided to and reviewed by the Deans Council, as well as all other conflict information, if any, provided by employees.

#### CONFLICTS OF INTEREST ACKNOWLEDGMENT AND DISCLOSURE FORM

I have read the conflicts of interest policy set forth above and agree to comply fully with its terms and conditions at all times during my employment as a UIWSOM employee. If at any time following the submission of this form I become aware of any actual or potential conflicts of interest, or if the information provided below becomes inaccurate or incomplete, I will promptly notify the Dean and HR in writing.