TO: Office Heads and Academic Managers

FROM: Lianne Sullivan-Crowley

SUBJECT: Annual Disclosure Process for Conflict of Interest and Other Information

DATE: December 15, 2016

The Annual Disclosure and Certification Form is now available for this year’s annual disclosure process, which includes written certification by all employees that they have reviewed and are familiar with their responsibilities as described by the following policies and regulations:

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<th>Reporting Potentially Illegal Activity</th>
<th>5.2.6 Gifts and Gratuities</th>
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<td>2.1.5 Hiring Members of the Same Family or Household</td>
<td>5.2.7 Solicitation and Distribution</td>
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<td>5.2.1 Conflict of Interest</td>
<td>5.2.8 Outside Consulting for Faculty Members Who Hold Administrative Appointments</td>
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<td>5.2.2 Nepotism and Personal Relationships in the Workplace</td>
<td>5.1.2 Drug Free Workplace</td>
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<td>5.2.3 Consulting and Other Outside Activities</td>
<td>Gender Equity Notice</td>
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<td>5.2.4 Purchasing and Contracts</td>
<td>Conscientious Employee Protection Act (English)</td>
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<td>5.2.5 Use of University Resources</td>
<td>Conscientious Employee Protection Act (Spanish)</td>
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Department managers may also want to consider implementing the University’s Confidentiality Agreement template developed to safeguard sensitive and confidential University information properly. Refer to the OIT website for more information.

The timeline and process for this year, described below, applies to all staff members hired through the Office of Human Resources. Individuals appointed through the Office of the Dean of the Faculty or the Princeton Plasma Physics Laboratory should follow the DoF or PPPL procedures respectively.

By Friday, February 10, 2017, all employees should:

- Review all policies and regulations listed above.
• Read the guidelines, “Conflict of Interest and Conflict of Commitment: Understanding Your Obligations,” to help you and your employees more easily recognize situations that might create a conflict of interest, a conflict of commitment, or an appearance of a conflict.

• Complete the Annual Disclosure and Certification Form for the 12-month period ending December 31, 2016.

By Tuesday, February 28, 2017, you should forward the following information to your vice president or dean and, in the case of academic managers, to Karen Haskin, assistant provost for academic management, Office of the Provost, 323 Nassau Hall:

1. a copy of your own annual disclosure form;
2. an e-mail or memo to confirm that all staff members in your department have reviewed the policies and regulations and completed the form; and
3. a hard copy of all disclosure forms for employees who identified a conflict of interest. Your vice president, dean, or the assistant provost for academic management will confer with me to address and resolve these situations.

In summary, as a manager you are responsible for:

1. disseminating the policies and regulations listed below and the disclosure form to all employees hired through the Office of Human Resources;
2. ensuring all employees review the policies and regulations and complete the disclosure form; and
3. informing your vice president or dean of any individual who reports a conflict of interest or conflict of commitment. Managers in academic units should report the information to Karen Haskin. How you manage this step is especially important in departments that have several tiers of management up to and including the executive officer. Your senior HR manager is also available for consultation to help you assess the information disclosed.

Should you have any questions or concerns about these policies or procedures, please contact your senior HR manager.