

# UNIVERSITY OF SOUTH FLORIDA

## Code of Conduct for Financial Functions

### INTRODUCTION

The University of South Florida (“USF”) is a multi-campus national research university that supports the development of the metropolitan Tampa Bay Region, Florida, the United States and the world. Central to the mission of the University is the management of resources entrusted to the USF Board of Trustees from a variety of funding sources. The Florida constitution was revised in 1968 to require that a code of ethics for all state employees, prohibiting conflict between public duty and private interests, be prescribed by law, and implementing laws have been enacted.

In addition to the constitution and laws of the State of Florida, this USF Code of Conduct for Financial Functions (“Code”) demonstrates the University’s commitment to the highest standards of conduct. The USF is adopting this Code to promote:

- Honest conduct, including the ethical handling of actual or apparent conflicts of interest between personal and institutional or affiliated-entity professional relationships;
- Full, fair, accurate, timely and understandable disclosure in financial reporting;
- Compliance with applicable university, state and federal laws, rules and regulations; and
- Prompt reporting for violations of the Code to the USF Office of Audit and Compliance.

### EMPLOYEES

- Employees of the USF and USF related entities (e.g., employees of Direct Support Organizations) performing assigned functions with financial and/or budgetary responsibility and/or having access to financial information and/or assignment of accountable officer responsibilities shall adhere to the Code.
- Employees of the USF and USF related entities shall foster the development and maintenance of best business practices for their unit, department, division and the University.

## CONFLICTS OF INTEREST

Employees of the USF and USF related entities shall be prepared to assist in the identification of actual and possible conflicts of interest that may arise in their individual departments, and to this end, shall refrain from accepting duties, incurring obligations, accepting gifts or favors of monetary value, or engaging in private business or professional activities where there is, or would appear to be, a conflict between the employee's private interests and the interests of the USF or the USF related entity.

Specifically, all USF employees are governed by the Code of Ethics for Public Officers and Employees, as set forth in Chapter 112, Part III, Florida Statutes and USF Regulations and Policies. Employees are responsible for familiarizing themselves with this Code. Examples of prohibited actions specified in this Code include, but are not limited to, the following:

- Should not accept or solicit anything of value if it gives the appearance of or has the effect of influencing their official actions.
- Are prohibited from soliciting any gift from a vendor, lobbyist or political group and from accepting any gift worth more than \$100.00 from a vendor, lobbyist or political group.
- Are prohibited from inappropriately using or attempting to use their position, or any USF property or resource, to obtain a special benefit or privilege for themselves or others.
- Are prohibited from disclosing or using non-public information, obtained by reason of their public position, for the personal benefit of themselves or others.
- When acting as purchasing agents or in a public capacity, are prohibited from purchasing, renting or leasing any realty, goods or services for their agency from a business entity in which they, their spouse, or child own more than a 5% interest. They may not sell, rent or lease to USF the realty, goods or services of a business entity in which they, their spouse, or child own more than a 5% interest.
- Are prohibited from holding any employment or contractual relationship, which interferes with employees' full and complete performance of their duties or which would impede the full and faithful discharge of their public duties.
- When participating in the decision making process involving a purchase request, or when influencing the content of any specification or procurement standard, or when rendering advice, investigation, or auditing, regarding his/her agency's contract for services, are prohibited from being employed with a person or entity holding such a contract with USF.
  - Exemptions—prohibitions against doing business with one's agency and conflicting employment may not apply in some cases (e.g., sealed competitive bidding, aggregate transactions that do not exceed \$500.00 in a year, emergency purchases to protect public health, safety or welfare, etc.). Consult the Code of Conduct for Financial Functions or seek legal advice in such cases.

- Who are required by USF to do so, must file a Statement of Financial Interests form annually and, if applicable, a Disclosure of Gift form quarterly with the Department of State in Tallahassee.

USF has promulgated Regulations on “Conflicts of Interest and Outside Employment” for faculty and other employees. They can be accessed from the USF Home Page by navigating to “USF 10-107” for Faculty or “USF 10-206” for Staff.

## **INTERNAL CONTROLS**

Employees of the USF and USF related entities performing assigned functions with financial or budgetary responsibility and/or having access to financial information:

- are responsible for establishing and maintaining proper internal controls as aligned with their respective role and assigned duties, that provide security and accountability for the resources entrusted to their respective department, unit or subdivision.
- must be familiar with the risks and exposures inherent in their areas of responsibility and assignments, and be alert for any indications of improper activities, misappropriation or dishonest activity.
- shall assess and/ or monitor, as assigned to their position, the quality of departmental internal controls and, if needed and as assigned through their supervisor, implement or recommend implementation of control improvements, included but not limited to segregation of duties for procurement of goods and services.
- shall take immediate action within their authority to resolve, or alert appropriate management about, any control weaknesses that could affect the reliability of financial reporting.

## **GENERAL PROTOCOL – REPORTING PROCEDURE**

- Anyone who believes that fraud, misuse of public position or resources, forgery or misrepresentation has occurred should immediately report such incident to the USF Office of Audit and Compliance at 974-2705 or the Anonymous Information Line at 974-8411 for proper action or referral.
- In cases of theft or forgery, USF employees must immediately contact the USF Police Department and also report the incident to the USF Office of Audit and Compliance.

Employees of the USF and USF related entities performing assigned functions that include budgetary or financial responsibility and/or having access to financial information shall receive a copy of this Code, and shall exercise their authority to comply with this Code’s provisions by virtue of their appointment or any additional powers delegated to them from time to time in accordance with and by reference to applicable USF, State of Florida and Federal laws, rules and regulations.

**University of South Florida**  
**Code of Conduct for Financial Functions Certification**

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I have read the above stated USF Code of Conduct for Financial Functions and agree to hold myself and those who report to me to the highest standards of ethical conduct, including the ethical handling of actual or apparent conflicts of interest between personal and institutional or affiliated-entity professional relationships; full, fair, accurate, timely and understandable disclosure in financial reporting; compliance with applicable USF, State of Florida and Federal laws, rules and regulations; and prompt reporting of violations of this Code to the University Office of Audit and Compliance. I understand that violation of this Code may result in disciplinary action up to and including dismissal from this position and/or dismissal from employment.

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Name (print or type): \_\_\_\_\_

Title: \_\_\_\_\_ Department: \_\_\_\_\_

Signature: \_\_\_\_\_ Date: \_\_\_\_\_