

Ethics Policy/Code of Conduct

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1.0 Preamble

1.1 Purpose. The Wistar Institute is committed to the highest standards of professional conduct, and expects the members of its community to act with integrity, honesty and fairness in the workplace. Each member of the Institute community shares responsibility for ensuring that these institutional values are carefully maintained and promoted. This code of conduct is a statement of our community's collective commitment to upholding these values, and complying with the relevant standards, policies, laws and regulations that guide our work.

1.2 Applicability. This code of conduct applies to the following members of the Institute community: i) individuals who are paid a salary or stipend by the Institute (employees, trainees); ii) individuals who perform services for the Institute as volunteers or collaborate with Institute researchers; and iii) if required by contract, consultants, vendors or contractors who provide goods or services to the Institute.

1.3 Violations. Members of the Institute community are responsible for informing appropriate administrators of suspected violations of applicable standards, policies, laws or regulations, as described below. Such reports are welcomed and, when made in good faith, will not jeopardize one's position or employment. If the Institute confirms a violation of a standard, policy, law or regulation, it will take disciplinary action as appropriate, up to and including termination of employment.

1.4 Questions. Any questions concerning this policy should be directed to the Vice President for Legal and External Affairs.

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2.0 Standards of Conduct

As an institution that receives substantial public support, The Wistar Institute recognizes that it must earn and maintain a reputation for integrity; and, likewise, that the validity of the scientific research conducted at the Institute is based on public trust in that research. It must strive to ensure that the members of its community adhere to applicable laws and regulations, and to the Institute's contractual commitments. When its research, training or business activities are not governed by specific laws or regulations, such activities must be conducted with fairness, integrity and respect for the rights of others.

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3.0 Conflict of Interest/Conflict of Commitment

3.1 The Institute's governing board and employees must ensure that their personal, professional and financial interests do not conflict with the interests of the Institute. Annually, these individuals are required to disclose any personal, professional and financial interests in compliance with the Institute's *Policy on Disclosure of Potential Conflict of Interest*. In addition, Institute researchers who receive federal research support must disclose any significant personal financial interests relating to their research as described in the Institute's *Financial Conflicts in Research Policy*.

3.2 All Institute employees owe their primary professional allegiance to the Institute. Outside professional obligations and consulting arrangements must be disclosed to the Institute's President/CEO, and consulting arrangements must be approved by him or her in advance as provided in the Institute's *Consulting Policy*.

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4.0 Institute Records

All Institute books, records and accounts (including, without limitation, financial reports, tax returns, expense reimbursements and time sheets) must be maintained in an accurate, clear, complete and auditable manner, in conformity with generally accepted accounting practices and all applicable laws and regulations. No entries should be made which conceal or disguise the true nature of any Institute transaction. Employees are expected to give their full cooperation to the Institute's independent auditors and to provide complete and clear information in response to their requests. Institute books, records and accounts, including laboratory research records and computer files and databases, are the property of the Institute and should not be removed from the Institute except as required for the performance of work-related duties.

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5.0 Gifts and Gratuities

Institute employees may not solicit or accept substantial gifts or gratuities from any individual or entity that has or seeks to have a business relationship with the Institute. Employees may accept payment of business meals or related entertainment from a vendor or contractor only if the payment is consistent with usual and customary business practice. Employees should seek advice from the Vice President for Legal and External Affairs if they are unsure of the acceptability of a gift or gratuity.

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6.0 Compliance with Laws

Members of the Institute community must transact Institute business in compliance with applicable laws, regulations and Institute policies and procedures. No individual should take any action on behalf of the Institute which the individual knows or reasonably should know would violate a law or regulation. Managers and supervisors are responsible for teaching and monitoring compliance. When questions arise pertaining to the interpretation or applicability of a policy, law or regulation, individuals should contact the person who has oversight of the policy, or the Vice President for Legal and External Affairs.

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7.0 Human Resources

The Institute is dedicated to fostering an environment of fairness and respect for current and prospective community members. To encourage such behavior, the Institute prohibits discrimination and harassment, and provides equal opportunities for individuals regardless of race, color, religion, creed, national origin, ancestry, sex, age, veteran status, disability, sexual orientation or gender identity. When the Institute finds that this standard has been violated, it will take prompt action to end the offending conduct, prevent its recurrence and discipline those responsible. Specific policies in support of this standard are found in the Institute's *Human Resources Policy Manual*.

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8.0 Environmental Health and Safety

The Institute is committed to protecting the health and safety of community members by providing a safe workplace. It will provide information and training about health and safety hazards and safeguards to individuals, and require community members to adhere to good health and safety practices, and comply with all environmental health and safety laws and regulations.

Specific guidance on health and safety standards and practices is available in the on Environmental Health and Safety Department's web pages.

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9.0 Research Integrity

The Institute expects its scientists to conduct their research in accordance with established standards for executing, recording and reporting scientific investigations, and to give appropriate and fair acknowledgment to those who contribute to such efforts. Investigators should consult the Institute's *Policy and Procedures Regarding Research Misconduct* for information on reporting any suspected violation or breach of ethical research standards.

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10.0 Use of Institute Resources

Institute resources must not be used for personal purposes except in a manner that is incidental and reasonable in light of an employee's duties. Institute resources include, but are not limited to, the use of telephone systems, data communication and networking services, equipment such as computers or tools, vehicles, credit cards or petty cash, and research reagents or materials. Institute resources are also broadly defined to include the time and effort of trainees or subordinate employees.

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11.0 Reporting and Investigation of Suspected Violations

11.1 Reporting Violations. Members of the Institute community are required to report suspected violations of applicable policies, laws, regulations, contract terms or this code of conduct to the Institute administration. Typically, violations should be reported to the individual's immediate supervisor; however, if for any reason an individual does not feel comfortable reporting a suspected violation to his/her supervisor, the individual also may report the violation to the Director of Human Resources, the Vice President for Legal and External Affairs, or to the institutional compliance hotline at 888-475-8376. Such reports may be made confidentially, or even anonymously, but individuals should be aware that it may be difficult for the Institute to investigate complaints for which only limited information has been provided. Preferably, allegations should be made in writing to assure a clear and detailed description of the issues. As noted in Section 6.3, any suspected violation or breach of ethical research standards should be reported as described in the Institute's *Policy and Procedures Regarding Research Misconduct*. All members of the community are expected to cooperate fully in the investigation of alleged violations or misconduct.

11.2 No Retaliation. The Institute will not condone retaliation against an individual who in good faith reports a suspected violation under this policy. An employee who retaliates against or harasses someone who has reported a violation in good faith will be subject to disciplinary action, up to and including termination. Likewise, any employee who uses or attempts to use his or her authority or position to suppress such an allegation, or to interfere with the investigation of an allegation, will be subject to disciplinary sanctions.

11.3 Investigation of Violations. All reports of alleged improper activity under this policy will be promptly forwarded to the President, who will be responsible for coordinating the investigation of the alleged violation and taking required corrective action. In the event the allegation implicates the President, it shall be forwarded to the Audit Committee of the Board for response and resolution.

11.4 Reasonable Belief. Individuals reporting a violation or suspected violation of the code of conduct are expected to act in good faith and have reasonable grounds for believing that the code has been violated. Any individual who knowingly or maliciously makes a false allegation of impropriety will be subject to disciplinary action, up to and including termination.

11.5 Complaints of Retaliation. Any employee who believes he or she has been retaliated against for reporting a suspected violation under this policy, or for refusing to engage in activity that might constitute a violation of the policy, should immediately contact the Vice President for Legal and External Affairs (or, if the complaint is directed at the Vice President for Legal and External Affairs, then the employee should contact the President). All such complaints will be investigated promptly and disciplinary action taken if the complaint is substantiated.

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