

# Badr University in Cairo (BUC)

## Employee Policy on Disclosure of Conflicts of Interest

### Approvals

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## **Purpose for the policy :**

Badr University, including its Schools and other units, is committed to operating in an ethical manner and in compliance with applicable legal and regulatory requirements. Even the appearance of a conflict can be damaging to the reputation of BUC.

All decisions by employees covered by this policy (described below) must be made solely in the best interests of BUC.

BUC recognizes that situations may on occasion arise where an employee's private interest conflict with or appear to conflict with his or her obligations to BUC or the interests of BUC.

This policy is intended to educate employees about situations that generate the potential for Conflicts of Interest; to clarify expectations about disclosing interests and activities that might result in Conflicts of Interest; and to identify means to manage, reduce, or eliminate such Conflicts of Interest.

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## **Policy Definitions:**

A “**Conflict of Interest**” is any circumstance in which the personal, professional, financial, or other interests of an employee may potentially or actually diverge from, or may be reasonably perceived as potentially or actually diverging from, his or her obligations to BUC and the interests of BUC. It includes indirect conflicts, such as benefits provided to an Immediate Family Member of an employee.

“**Confidential Information**” includes, but is not limited to: medical, personnel, security, academic, background check, conflict of interest, and other non-public information about individuals; business records; contracts and business terms; business strategy; computer system passwords and security codes; proprietary and competitively sensitive information, including non-public information about anticipated material requirements, price actions, programs, and selection of contractors and subcontractors in advance of official announcements; unpublished grant proposals, non-public research data, manuscripts and correspondence; non-public financial, procurement, health-safety, audit, insurance and claims information; and non-public information relating to internal investigations, pre-litigation and litigation and administrative agency charges, audits and inquiries; and other information whose confidentiality is protected by law or BUC policies.

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“Immediate Family Member” means the spouse or domestic partner or person in a civil union or similar relationship, dependent children, and any other family members residing in the same household as an employee.

“BUC” means the Schools and other units of BUC and all University Affiliates.

“**University Affiliates**” consist of those entities controlled, directly or indirectly, by the University through:

- (a) Ownership of more than 50% of the ownership interests in the entity.
- (b) The power to appoint or elect a majority of the organization's governing body (e.g., directors or trustees).

“**University Leadership Team**” means those academic and administrative leaders who are designated as members of the University Leadership Team by the President of BUC

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## Scope of this Policy

This policy applies to all employees of BUC & BUC Affiliates. Certain Schools or units of BUC may have conflicts of interest policies, consistent with this policy, that supplement this policy and are tailored to the activities of those Schools within BUC.

Applicable employees also are subject to those policies.

## Policy Specifications

Employees should seek to avoid Conflicts of Interest. A **“Conflict of Interest”** is any circumstance in which the personal, professional, financial, or other interests of an employee may potentially or actually diverge from, or may be reasonably perceived as potentially or actually diverging from, his or her obligations to BUC and the interests of BUC.

It includes indirect conflicts, such as benefits provided to an Immediate Family Member of an employee.

An employee:

- (1) must promptly disclose any Conflict of Interest and should anticipate the possibility of a Conflict of Interest whenever possible so that the possible Conflict of Interest can be reviewed prior to occurrence.
- (2) Where relevant, cooperate with any plan adopted by BUC to manage, reduce, or eliminate the Conflict of Interest. Where an

employee is not initially aware of the Conflict of Interest but becomes aware of it at a later time. The individual should disclose the Conflict of Interest promptly upon learning of it. In addition, some employees are required to complete an annual disclosure form or forms and submit such form or forms to the General Secretary Office.

This policy applies to any circumstance that may constitute a Conflict of Interest, regardless of whether it is specifically described in this policy.

For example, while personal interests of employees are defined to include those of the person and his or her Immediate Family Members, there also may be situations where the interests of other persons, such as a close friend or other family member, create a Conflict of Interest.

**The following is not a comprehensive list of the types of Conflicts of Interest that may arise but provides examples of some common types:**

**(1) Business Arrangements:**

Participating, directly or indirectly, in the selection, approval, facilitation, or administration of any business arrangement involving BUC and an Immediate Family Member of an employee or an enterprise in which the employee or Immediate Family Member holds, directly or indirectly, more than **the minimal**

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**limit of ownership** or other financial interest or has an employment, management, or fiduciary role (such as serving as an officer or director).

**(2) Competing with BUC:**

Engaging, directly or indirectly, in activities that are in competition with BUC or appropriating or diverting business opportunities of BUC.

This includes:

- (1) Holding, directly or indirectly, an ownership or other financial interest (other than a *de minimis* interest) or having an employment, management, or fiduciary role (such as serving as an officer or director) in an enterprise that is a competitor of BUC, or seeking to advance the interests of such enterprise to the BUC Community.
- (2) Appropriating or diverting a business or financial opportunity that an employee knows or should know BUC is pursuing or is considering pursuing or reasonably might be interested in pursuing if it were aware of the opportunity.

**(3) Accepting Gifts:**

- (a) Accepting any gift or favor, even of nominal value, that is illegal under applicable law or prohibited under other applicable BUC policies.



(b) Accepting a gift or favor of more than nominal value (including entertainment) or a loan (other than an arm's length loan made in the ordinary course of business from a banking or other financial institution), even where not illegal under applicable law or prohibited under other applicable BUC policies, from any person or entity seeking a benefit from BUC (e.g., seeking to do business or continuing to do business with BUC, seeking to have a student admitted to BUC) if the offer or acceptance of the gift, favor, or loan could reasonably be viewed as intended to influence BUC to act favorably toward the person or entity. Where it is impracticable for the employee (or his or her Immediate Family Member) to decline a gift that would otherwise constitute a Conflict of Interest under this policy, and where it is neither illegal nor unethical for BUC itself to accept the gift, the individual may accept the gift on behalf of BUC with the permission of his or her supervisor and then transfer it to BUC. In such case, the individual should contact the University President or the General Secretary to discuss the transfer of the gift to BUC.

#### **(4) Improper Use of BUC Resources:**

Unauthorized use of BUC resources, including the services of University employees, for personal purposes. For example, while an employee may make *de minimis* use of BUC computers and telephone devices for personal purposes provided, however, that

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he or she reimburses BUC if there are additional charges to BUC from such use (e.g., a charge for an international phone call), an employee may not use BUC students or staff to conduct personal business.

**(5) Confidential Information:**

Obtaining, using, or disclosing BUC Confidential Information for direct or indirect personal interest, profit, or advantage; obtaining or using BUC Confidential Information for a purpose that may be detrimental to BUC; or disclosing BUC Confidential Information to a person or entity that is not authorized by BUC to receive it.

**(6) Compliance with BUC Policies:**

Failure to comply with applicable BUC policies.

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## Procedures for Implementation

### (1) Disclosing Conflicts of Interest

Employees have a duty to disclose on an ongoing basis any current, proposed, or pending situations that may constitute a **Conflict of Interest** and should disclose the material facts relating to any Conflict of Interest as soon as the existence of a possible Conflict of Interest is known.

An employee must disclose a Conflict of Interest to his or her supervisor. Prior to approving an actual Conflict of Interest, the supervisor must consult with the General Secretary. Any employee or supervisor who has questions about this policy or its application may seek guidance from the Office of General Secretary.

### (2) Managing Conflicts of Interest

Once a Conflict of Interest is disclosed, the relevant BUC administrator will determine the next steps with respect to the Conflict of Interest. BUC may determine that the Conflict of Interest should be managed, reduced, or eliminated.

Any management plan will depend upon the facts and circumstances of the specific matter.

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### **(3) Enforcement**

Violations of this policy are subject to disciplinary action, up to and including termination of the employee's association with BUC, in accordance with the BUC disciplinary policies and procedures applicable to the individual and the policies and procedures of the relevant School or unit, if any.

#### **Examples of Conflicts of Interest**

1. An employee works part-time for a company that seeks to advertise to BUC students. The employee is asked by the company to send an email to BUC distribution list to advertise its services.
2. An employee encourages his/her brother to apply to an open position at BUC being reviewed by a hiring committee on which he/she sits in.
3. An employee involved in executive education programs at BUC accepts gifts from students or from an executive education company.

## Revision History

Version	Date	Modified Areas
0.1	January, 2020	—
0.2	January 2021	