

*Effective August 1, 2022*



# The RF Code of Conduct

## Building a Culture of Compliance

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*Service, Learning, Agility, Transparency, Diversity, Innovation,  
Integrity*

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## PRESIDENT'S LETTER

Dear Colleagues,

It is an exciting time to be at the RF. We are working more closely than ever with our counterparts at System and the campuses to achieve common goals. With that in mind, and in service to SUNY, the research community and the wider public, our efforts must be guided by the core principles of the RF Code of Conduct:

No matter your role, following laws, regulations, and policies; treating colleagues with respect; acting with integrity; asking questions when unsure; and reporting unethical behavior are not only required, they are critical to our reputation and success.

If you suspect or become aware of improper behavior at the RF, please speak up. You can contact your supervisor or utilize any of the channels identified in the "Raising Concerns" section of the code, including the [Speak Up RF – Ethics Hotline](#). You can report concerns anonymously with the confidence and assurance that the RF will not tolerate the harassment or victimization of individuals who raise concerns or participate in RF investigations of potential violations of law or RF policy.

In my dual role as RF President and Executive Vice Chancellor for Academic Affairs and Provost for SUNY, I view adherence to our code as essential to pursuing our collective and institutional vision to grow SUNY's research portfolio and make SUNY the best place for faculty, students, and staff to research, innovate, and solve the world's most pressing problems.

Thank you for your commitment,

Melur K. "Ram" Ramasubramanian

## CHIEF COMPLIANCE OFFICER'S MESSAGE

At the RF, we measure our success not only on financial performance, but on our greater impact. Our leaders are committed to good corporate citizenship and encourage all of us to make values-based decisions.

Our Code of Conduct demonstrates shared dedication to upholding the RF's high ethical standards, fostering a community of compliance champions, and our continued commitment to the RF's values. Together we are committed to: Service, Learning, Agility, Transparency, Diversity, Innovation, and Integrity.

In support of these values, we have established the 10 PILLARS OF CONDUCT. The 10 Pillars highlight our shared commitment to promoting:

- a safe, secure and healthy workplace;
- adherence to relevant laws, rules, and regulations;
- high standards of professional conduct, mutual respect, and transparency;
- responsible management and leadership;
- and a diverse, inclusive workplace, free of harassment and discrimination.

In all that we do, we must hold ourselves and each other accountable to these pillars. Each of us has a part to play to support our goals in the most ethical way possible.

Thank you,

Joshua

Vice President of Compliance and Chief Compliance Officer

## ROLES AND RESPONSIBILITIES

### Who is Covered?

The Code applies to you if you are:

- a member of the Research Foundation Board of Directors
- an officer or appointed officer
- an Operations Manager or Deputy Operations Manager
- an RF employee
- SUNY faculty acting in the capacity of a principal investigator, or Research Foundation representative, for a sponsored program or other activity administered by the Research Foundation
- a technology transfer director or equivalent
- a sponsored program office director or equivalent
- a person with significant decision-making capacity with respect to the professional, technical, or scientific aspects of a program or project conducted or administered through the RF with apparent or delegated authority to act in the name of the RF
- any other person acting on behalf of or representing the RF

## **Responsibilities of Research Foundation Employees and Representatives**

- Read and be familiar with our Code of Conduct
- Administrative RF employees must annually certify that they have read and agree to act in accordance with our Code of Conduct and comply with its requirements
- Be safe, ethical, and act in a manner consistent with applicable laws, rules, regulations, and RF policies, values, and goals
- Ask questions
- Report concerns if you become aware of violations
- Cooperate fully when responding to an audit, review, request for records, or investigation

## **Additional Responsibilities of Managers, Supervisors, and Other Research Foundation Leaders:**

- Lead by example, be a positive role model, and support your team in a respectful and inclusive environment
- Encourage others to find their voice, speak up without fear of retaliation, and allow others to be heard
- Listen to concerns and respond appropriately
- Do not tolerate and promptly report discrimination, retaliation, or harassment
- Help others understand what is expected of them
- Equitably enforce RF policies

## INTEGRATING COMPLIANCE INTO OUR CORPORATE CULTURE

It is YOUR ethical and professional obligation to understand and comply with the current policies, laws, and regulations that apply to your work at the Research Foundation.

Understanding how to successfully navigate dilemmas in your day-to-day work is critical to upholding the RF's commitment to good corporate citizenship. None of us is perfect and mistakes will happen, but intentionally disregarding the rules governing RF activity can reduce the efficiency of our operations, create safety issues, increase financial liability, and invite harmful scrutiny of the RF as an organization, as well as its employees and representatives.

Violation of any [RF policy](#), procedure, or guideline can result in disciplinary action, including termination of employment. If you have any questions about interpreting or applying the Code of Conduct—or any other [RF policies, procedures, or guidelines](#)—it is your responsibility to consult either your manager, [your Operations Manager](#), [RF Office of General Counsel and Secretary](#), the policy owner, Human Resources, or [the Office of Compliance Services](#).

Penalties for failure to comply with laws can be severe and may result in fines, lawsuits, loss of business privileges and, in some cases, imprisonment of individuals. If you have questions about how to comply with specific laws or regulations relating to your RF role or activity, contact the [RF's Office of Compliance Services](#) or the [Office of General Counsel and Secretary](#).



## **RESEARCH FOUNDATION PILLARS OF CONDUCT**

- 1. Promote Health and Safety in the Workplace**
- 2. Follow the Law and Promote a Culture of Compliance**
- 3. Act Ethically and With Integrity**
- 4. Respect Our Community and Our Environment**
- 5. Follow the Rules and Policies Governing Your Work**
- 6. Promote a Diverse, Inclusive, and Transparent Workplace**
- 7. Lead People Responsibly**
- 8. Protect and Preserve RF Resources**
- 9. Avoid Conflicts of Interest**
- 10. Carefully Manage Confidential Information**

### **1. Promote Health and Safety in the Workplace**

To promote a safe, secure, and healthy environment everyone is expected to:

- Follow safe workplace practices, use personal safety equipment, and report accidents, injuries, and unsafe situations
- Maintain security and report suspicious activities
- Protect the environment by carefully handling potentially hazardous agents, materials, or conditions
- When possible, attend emergency preparedness training if provided at your operating location

### **2. Follow the Law and Promote a Culture of Compliance**

Everyone is expected to:

- Be knowledgeable of the applicable federal, state, and local laws, rules, and regulations applicable to your work at the RF
- Follow RF and SUNY policies, and relevant contract terms
- Work to prevent and detect any compliance violations
- Report suspected violations to supervisors or other RF officials, or through the Speak Up RF- Ethics Hotline
- Ensure that reports of violations within your area of responsibility are properly resolved, including disclosure to sponsors or other state or federal authorities as appropriate

### **3. Act Ethically and With Integrity**

Everyone is expected to:

- Take actions to minimize the negative impact your work has on others, your community, and the environment
- Act according to the highest occupational and professional standards of conduct
- Take personal responsibility for our actions and correct mistakes

- Take our obligations to co-workers, the RF, and SUNY seriously
- Refrain from dishonest conduct
- Lead by example to show others the right way to act

#### **4. Respect Our Community and Our Environment**

As representatives of the Research Foundation everyone is expected to:

- Recognize the impact our work has on others, the larger RF community, and our workplace environment
- Minimize the negative impact of your work
- Listen to and acknowledge other opinions
- Treat others, your workplace, and your community in a thoughtful and courteous way
- Say thank you and celebrate success

#### **5. Follow the Rules and Policies Governing Your Work**

Everyone is expected to:

- Be knowledgeable, up-to-date and compliant with all relevant laws, rules, and policies
- Propose, carry out, and document research with integrity and honesty
- Comply with sponsors, state and federal agencies, regulatory bodies and other applicable entities' requirements
- Learn your responsibilities and be accountable for meeting the requirements of sponsors, regulatory bodies, and other applicable entities
- Embrace the professional standards of your occupation or profession

#### **6. Promote a Diverse, Inclusive, and Transparent Workplace**

At the RF, we are committed to tolerance, diversity, and respect for differences. Everyone is expected to:

- Make merit-based decisions

- Promote transparency while respecting confidentiality and personal privacy
- Be polite, fair, and respectful
- Be honest
- Avoid all forms of harassment, discrimination, threats, or violence
- Offer equal access to programs, professional development opportunities, facilities, and employment
- Promote conflict resolution

## **7. Lead People Responsibly**

The RF entrusts managers and supervisors with a great deal of responsibility. Leaders of this organization are expected to:

- Provide training on workplace rules, policies, and procedures, including this Code
- Ensure compliance with laws and policies
- Equitably and carefully review performance
- Value diversity of thought and encourage intellectual and professional growth
- Promote a healthy environment that encourages people to raise concerns without fear of retaliation
- Encourage greatness, with the understanding that none of us are perfect
- Put your team ahead of your personal success and commit to building its capability
- Lead with integrity and humility

## **8. Protect and Preserve RF Resources**

Everyone is expected to:

- Use RF property and other resources only for legitimate business and lawful purposes and use them efficiently
- Prevent and detect fraud, waste, and abuse
- Use strong financial practices, financial controls, and accounting systems

- not enter into an agreement or otherwise bind the RF contractually or financially, without properly delegated authority

## 9. Avoid Conflicts of Interest

It is important to be objective and independent in making decisions on behalf of the RF. To ensure this objectivity, everyone is expected to:

- Follow the RF's [Conflict of Interest policy](#) and procedures and avoid actual individual or institutional conflicts of interest
- Promptly disclose potential conflicts of interest and adhere to any management plans created to remove or reduce any conflicts of interest
- Ensure that personal relationships or activities do not interfere with independent judgment in official RF decisions or activities

## 10. Carefully Manage Confidential Information

Federal and state law and [RF policy](#) govern the public's right to access RF information. You may create or have access to many types of information – some of which may be confidential or otherwise protected from disclosure. Everyone is expected to:

- Follow laws and [RF policies](#) and agreements regarding access, use, protection, disclosure, retention, and disposal of public, private, proprietary, and confidential information
- Follow document preservation and retention guidelines
  - (a) [Record Retention: Account Expenditure Records](#)
  - (b) [Record Retention: Person-related Records](#)
  - (c) [Record Retention: Project Administration Records](#)
  - (d) [Record Retention: Technology Transfer Records](#)
  - (e) [Record Retention: Destruction of Records Guideline](#)
- Follow the RF's [Confidential Information Policy](#) and [Acceptable Use and Security of RF Data and Information](#)

[Technology Policy](#) to maintain data security and use electronic and physical safeguards

## **OUR SHARED OBLIGATION**

### **Keeping Our Workplace Free of Harassment, Discrimination and Retaliation**

Consistent with our [Sexual Harassment Prevention Policy](#), [Equal Employment Opportunity and Antidiscrimination Policy](#), and related procedures, the RF strives for a workplace that is based upon mutual respect and a shared commitment to our values. We do not tolerate any form of abuse, intimidation, discrimination, retaliation, or harassment. Help us continue to maintain a workplace environment free of all forms of harassment, discrimination, and retaliation.

Offensive, derogatory, harassing, discriminatory, and sexually explicit comments and behavior are not acceptable and will not be tolerated. Such behavior may result in disciplinary action up to and including termination of employment.

### **Raising Concerns and Reporting Violations**

As Research Foundation employees and representatives, we have a responsibility to speak up if we believe someone may be engaged in improper conduct. Suspected violations of the law, our Code, or other [RF policy](#), must be addressed as soon as possible—before significant consequences develop.

If you know of, or have good reason to suspect, an unlawful or unethical situation, a violation of [Research Foundation policy](#), or believe you are a victim of prohibited workplace conduct, DO NOT CONDUCT YOUR OWN INVESTIGATION. Instead, we encourage you to report the matter immediately through any of the following channels:

- Your supervisor, department head, or chair
- Your campus RF human resources office

- [Your campus Operations Manager or Deputy Operations Manager](#)
- The [Speak Up RF - Ethics Hotline](#)
- [RF Corporate Human Resources](#)
- [RF Office of General Counsel](#)
- [RF Office of Internal Audit](#)
- [RF Office of Compliance Services](#)
- [The RF President](#)

Complaints or concerns may also be filed anonymously through the [Speak Up RF - Ethics Hotline](#) online at [www.rfsuny.org/speakuprf-ethicshotline](http://www.rfsuny.org/speakuprf-ethicshotline), by calling 800-461-9330 or via text message to 518-351-6827.

Employees who report a complaint or concern, or who participate in an investigation, are protected from retaliation. Immediately contact one of the individuals listed above if you believe you have been retaliated against or are aware of any retaliation.

### **Proper Reporting**

Individuals are encouraged to report concerns regarding misconduct or violations of policy that they believe occurred. This does not mean you must be certain that a violation is taking place; you just have to believe that the information you are providing is accurate. It is a violation of the Research Foundation's Code to knowingly make false accusations when reporting.

Any business record or report submitted to the RF or on the RF's behalf, e.g. to a sponsor or auditor, must be completed accurately.

Do not make misrepresentations or dishonest or misleading statements to anyone. If you believe that someone may have misunderstood you, promptly correct the misunderstanding. Reporting inaccurate or incomplete information or reporting information in a way that is intended to mislead or misinform is not allowed. In certain circumstances, there may be an obligation to

update or amend prior submissions to ensure their continued accuracy.

In order for the RF to conduct investigations and reviews, the help and cooperation of RF employees and representatives is critical. You must fully cooperate with all authorized internal investigations and reviews, and promptly, completely, and truthfully comply with all internal requests for information, including interviews and documents, during the course of such an investigation or review.

The following are some examples of dishonest reporting:

- Submitting an expense account for reimbursement of business expenses not actually incurred or misrepresenting the nature of expenses claimed;
- Failing to properly record time worked;
- For those eligible for overtime, falsifying or failing to record all hours worked, including all overtime hours;
- Providing inaccurate or incomplete information to RF management, RF Office of Internal Audit, RF Office of General Counsel and Secretary, or RF Office of Compliance Services during an internal investigation, audit or other review or to organizations and people outside the RF, such as external auditors; or
- Making false or misleading statements in external financial reports, environmental reports, import/export documentation, or other documents submitted to or maintained for government agencies.

### **Zero Tolerance for Retaliation**

The RF will not tolerate the harassment or victimization of individuals who raise concerns or participate in RF investigations of potential violations of law or [RF Policy](#). If you think that you or someone else has been threatened, intimidated, excluded from participation, humiliated, or treated inequitably due to participation in an investigation or review, or otherwise, contact the Speak Up RF - Ethics Hotline. Allegations of retaliation will be reviewed and



investigated consistent with our [Fraud and Whistleblower Policy](#) and [Procedure for Investigating Fraud and Misconduct](#) or our Anti-Harassment, Discrimination and Retaliation policies and procedures.

## **INTEGRITY IN DEALING WITH OTHERS**

### **Lobbying**

No individual is allowed to represent the RF's interests or opinions without specific authority. Any contact with government officials or employees for the purpose of influencing legislation or rule making, including activity in connection with marketing or procurement matters, may be considered lobbying and subject to state and federal rules.

You must not contact elected officials, legislative staff, or executive branch employees, in furtherance of RF objectives or on behalf of the RF, outside the normal business or grant cycle without proper authorization. This includes responding to inquiries or requests for information. This does not limit your ability to contact government officials for non-RF related matters.

### **Political Activity**

The RF does not make any corporate political contributions to any elected officials or candidates for political office. The RF does not endorse political candidates. However, the RF may encourage public officials to make non-partisan visits to RF locations, to better understand our work and our views on public policy issues.

Political campaigning is not allowed on RF property.

### **Speaking Publicly and Private Use of Social Media**

When you speak out on public issues or in a public forum, including social media like Facebook or X (formerly known as Twitter), you do

so as an individual and you should not give the appearance of speaking or acting on the RF's behalf without prior approval.

### **External Inquiries and Contacts**

Journalists, consultants, and others monitor the RF's business activities. You should not communicate with these individuals or groups on behalf of the RF by contacting them or responding to their inquiries, whether online (including social media), by telephone, or otherwise, without specific authorization.

Use the following guidelines for external inquiries and contacts:

- Reporters should be referred to the [RF Office of Industry and External Affairs](#);
- Attorneys or law enforcement officials should be referred to the [RF Office of General Counsel and Secretary](#);
- Auditors should be referred to the [RF Office of Internal Audit](#);
- Individuals seeking information under the Freedom of Information Law should be referred to the [RF Records Access Officer](#); and
- Government officials should be referred to [RF Government Relations](#).

### **International Trade Compliance**

The RF is subject to import and export laws and regulations, as well as boycotting regulations. It is our responsibility to be aware of these regulations and to understand their implications.

The RF Office of General Counsel and Secretary can help answer questions about the RF's import and export control requirements or antiboycott provisions. Contact the RF Office of General Counsel and Secretary for guidance in international trade compliance.

### **Exports**

In our global business, regardless of your work assignment or location, your actions may have export compliance implications. The RF's services and technology are subject to both U.S. and non-U.S.

export laws and regulations. Before RF services and technology can be exported, re-exported, or delivered anywhere, the RF must validate that it has the authorization to export under U.S. export regulations and any applicable non-U.S. laws and regulations.

Export laws and regulations may affect transactions, including:

- Intercompany transactions;
- In-country transfers of technology to recipients who are not citizens or permanent residents (e.g., where the recipient is a non-U.S. person located in the U.S.);
- Transactions with third parties, including suppliers and original equipment manufacturers;
- Use of RF business partners, alliance partners or agents to provide a service; and
- Any relationship where the RF will be involved with the export, re-export, or delivery of products, services, and technology anywhere in the world.

Export laws and regulations also cover:

- Electronic transfers of, and remote access to, software or technology;
- Provision of services over a network, including e-business and e-services;
- Design, development and delivery of hardware, software and solutions;
- Travel outside the U.S. with technology covered by applicable export control regulations;
- Providing technical specifications and performance requirements to suppliers;
- Disclosures of RF technology to recipients that are not citizens or permanent residents of the country (e.g., where the recipient is a non-U.S. person located in the U.S.); and
- The transfer of personal knowledge (technical assistance) outside the U.S. or country of residency.

### Imports

The RF must comply with all import laws, regulations and requirements when engaging in international trade or business. This includes compliance with obligations made to government agencies when participating in supply chain security and other trusted partnership programs. Because of the continued globalization of the RF's business, there are many situations, some of them very subtle, in which your role or work may have import implications.

In addition to the cross-border movement of physical items, there may be import implications resulting from other activities, such as:

- Change in manufacturing location, processes, or source of supply;
- Client activity requiring cross-border delivery;
- Cross-border shipment of marketing samples or prototypes;
- Calculation of product intercompany prices for sales to an RF location in another country;
- Determination of product country of origin; and
- Maintenance of accurate data and records for product inventory, sales, and shipment.

### Antiboycott

The RF may not follow or support a foreign country's boycott of a country that is friendly to the United States. Be aware that a foreign country or an entity associated with the country could require boycott participation in a bid invitation, purchase order or contract, letter of credit, orally in connection with a transaction or in a number of other ways. The RF is required to report any request to support a boycott to the U.S. Government.

Examples of improper boycott requests include requests that we refuse to do business with a certain country, its citizens, or with certain companies who do business with the boycotted country. Requests that the RF provide information about activities in a boycotted country, implement letters of credit with boycott conditions, or issue negative certifications of origin, also require legal

scrutiny. If you hear of or receive boycott-related requests, contact your manager.

### **Foreign Corrupt Practices Act awareness**

The Research Foundation is subject to the U.S. Foreign Corrupt Practices Act. This act prohibits Research Foundation representatives from offering anything of value to foreign officials, candidates, or parties in order to obtain or retain business or to influence official action.

It is the [policy](#) of the RF that each employee, representative, and agent of the RF comply with the anti-bribery laws of the United States and of foreign countries where the Research Foundation does business.

The RF strictly prohibits the giving or receiving of bribes in any of its business operations, regardless of whether it is commercial bribery or bribery of foreign government officials. This prohibition extends to all members of the RF community, both in and outside the United States.

### **Anti-competitive Conduct**

Antitrust laws are complex, and determining whether those laws apply to a particular activity is often very fact-dependent. To be sure that your actions aren't prohibited under federal law, do not enter into any agreement that: fixes or predetermines prices (including workforce salaries), allocates customers among the RF and any other organizations, restricts services or supply to a particular market, region, or location (or agrees not to service a location or community or campus in favor of letting another provider do so), or manipulates or "rigs" a competitive bidding process. If you have specific questions about these laws, please contact the Office of General Counsel.

### **Prohibition Against Terrorist Financing and Money Laundering**

The RF does not condone or engage in any financial crimes, including terrorist financing and money laundering. When dealing with third parties, you must be vigilant about choosing responsible business partners, and at all times you must be alert to any payment irregularities or suspicious behavior.

### **Procurement Integrity**

It is important that suppliers competing for the RF's business have confidence in the integrity of the RF's selection process. We must therefore consider competing suppliers objectively to determine the best choice for the RF. As an RF employee or representative, you should do so whether you are in a procurement job or any other part of the business—and regardless of whether it is a large or small purchase.

Never exert or attempt to exert influence to obtain special treatment for a particular supplier. Even appearing to do so can undermine the integrity of established procedures. Under no circumstances should an RF employee benefit personally from any transaction entered into by the RF.

All transactions are subject to the RF's policies governing procurement, conflicts of interest, nepotism, and gifts from non-RF sources. Please be sure to review all relevant policies prior to finalizing any transaction.

If you are unsure of the reliability of the selection process, contact your operations manager or the Finance Office.

### **Respect for Human Rights**

The Research Foundation is committed to being a responsible corporate citizen, respecting fundamental human rights and supporting the protection and advancement of human rights. We work hard to uphold standards for responsible business, including equal opportunity and the freedom to associate. We exercise our influence by conducting our business operations in ways that seek to respect, protect and promote the full range of human rights such as those described in the United Nations' Universal Declaration of Human Rights. Our values are embodied in policies and practices which ensure compliance with the laws where we do business and our commitment to human rights as guided by the laws of the United States and New York. As an RF employee or representative, you must show respect for human rights and follow all laws that respect human rights, including those that prohibit forced labor, harmful or exploitative child labor, and human trafficking.

### **Research Foundation Partners and Stakeholders**

Service, Learning, Agility, Transparency, Diversity, Innovation, and Integrity are the Research Foundation's values. We work with our partners in an honest, responsible, and respectful way highlighting our values and offering assurance to our partners that they can rely on the RF.

Our advantage is the quality of our work, not unethical or illicit practices.

As a service and support organization, our values reflect on SUNY and New York. Our vendors are critical to our mission and to the faculty and administrators we serve. We adhere to an objective selection process when choosing vendors and actively engage with partners that share our strong commitment to a safe and ethical environment.

Our partners and our stakeholders must be able to trust our

commitment to procurement integrity. We will clearly communicate our expectations to partners and vendors. We will report concerns with vendor non-compliance with applicable laws, contractual obligations, and RF values. We will work to meet any commitment asked of us, respecting partner values and applicable laws and rules governing partner businesses.



## RESOURCES

### Important Policies Governing Ethical Behavior

The RF has important policies that help each of comply with our Code of Conduct. You should be familiar with the following policies:

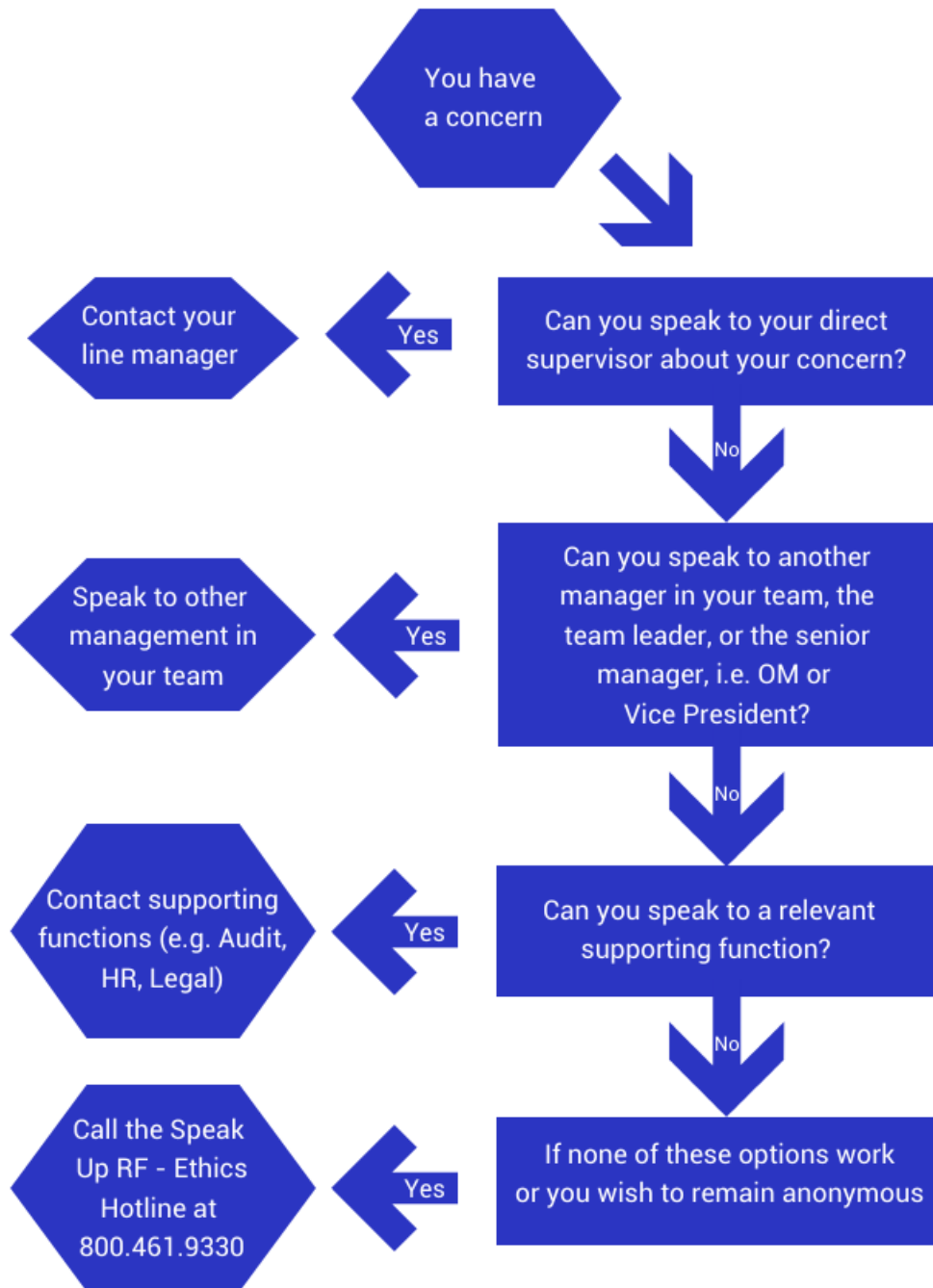
- [Conflict of Interest](#)
- [Delegation of Authority](#)
- [Gifts to Employees from Non-RF Sources](#)
- [Nepotism](#)
- [Sexual Harassment Prevention Policy](#)
- [Travel Handbook](#)
- [Procurement Policy](#)
- [Fraud and Whistleblower Policy](#)
- [Equal Employment Opportunity and Antidiscrimination Policy](#)

### Asking for Guidance

If you have any questions about interpreting or applying the Code of Conduct—or any other [RF policies, procedures, or guidelines](#)—it is your responsibility to seek guidance from any of the following at the RF:

- Your supervisor, department head, or chair
- Your campus RF human resources office
- [Your campus Operations Manager or Deputy Operations Manager](#)
- [RF Corporate Human Resources](#)
- [RF Office of General Counsel](#)
- [RF Office of Internal Audit](#)
- [RF Office of Compliance Services](#)
- [The RF President](#)

# How to Report a Concern



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*“Courage is an inner resolution to go forward despite obstacles.  
Cowardice is submissive surrender to circumstances.  
Courage breeds creativity; Cowardice represses fear and is  
mastered by it.  
Cowardice asks the question, is it safe?  
Expediency ask the question, is it politic?  
Vanity asks the question, is it popular?*

*But, conscience ask the question, is it right? And there comes a  
time when we must take a position that is neither safe, nor  
politic, nor popular, but one must take it because it is right.”*

*- Dr. Martin Luther King Jr.*

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