

**ADOPTED ON APRIL 28, 2009**

## **SOUTHSIDE BUSINESS TECHNOLOGY CENTER**

### INTRODUCTION

The SBTC is organized to provide entrepreneurial assistance and economic development activities for small businesses. To this end, the SBTC promotes high standards of conduct, communicates those standards to the public, and employs individuals of demonstrated competence who have agreed to uphold the SBTC's standards.

As representatives of the Southside Business Technology Center (SBTC) in partnership with Virginia Tech it is expected that each consultant will maintain the highest level of integrity and exercise proper judgment throughout each relationship. Client confidentiality and confidence cannot be sacrificed.

No representative (member of the Board, employee, faculty, student, intern, consultant, volunteer) of the SBTC shall release information about any client's relationship with the SBTC, or any information about the business or personal matters of any client to any person or agency outside the SBTC without written permission of the client. All representatives of the SBTC will understand and comply with the SBTC's Code of Ethics and Professional Conduct, including Conflict of Interest and client confidentiality requirements.

### **CODE OF ETHICS**

#### **PROFESSIONAL CONDUCT**

#### PURPOSE

This Code of Ethics and Professional Conduct acknowledges the acceptance by the representative of the obligation of self-discipline and disclosure above and beyond the requirements of law. It notifies the public that representatives of the SBTC will maintain a high level of professionalism and ethics, and requires these individuals accept the obligation to conduct themselves in a way that is beneficial to society.

The SBTC enforces the Code of Ethics and Professional Conduct by receiving and investigating all complaints of perceived violations and by taking disciplinary action against any individual if personally found to be guilty of the Code violation(s). The desire for confidence and respect of the profession should motivate the representative to maintain the highest possible professional and ethical conduct.

#### ACTION

In order to maintain the integrity of the SBTC program and to protect employees and clients, the following conflict of interest policy is adopted. All representatives of the SBTC must sign a "conflict of interest" agreement when they affiliate with the SBTC.

#### POLICY ON CONFLICT OF INTEREST

The SBTC provides the highest level of professional service to its clients. The SBTC has established safeguards to prohibit employees from using their positions for a purpose that is or gives the appearance of being motivated by a desire for a private gain for themselves, or others, particularly those with whom they have family, business, or other ties.

This policy is not intended to deprive any SBTC representative the opportunities available to other citizens, except when the exercise of these opportunities conflict with the interests of the SBTC, its clients, or its sponsors.

## CONFLICT OF INTEREST POLICY

### PURPOSE:

The purpose of this policy is (a) to prevent the actions of any representative of the SBTC from constituting a conflict of interest, (b) to provide a system for representatives of the SBTC to question and to receive a definite answer as to the existence of a conflict of interest.

### DEFINITIONS:

Conflict of Interest - a situation in which regard for a private interest or gain leads or has the potential to lead to a disregard of the needs of the SBTC or the rights of its clients.

Client - a business, individual, or legal entity with which the SBTC has entered into a contract, written or verbal, to provide any or all of the SBTC's available services.

SBTC Services - include, but are not limited to, business consulting; training; research of materials for a client; referrals to other agencies; provision of printed, copied, or magnetic media information; or other services that the SBTC may commonly and routinely perform for its clients.

Employee of the SBTC - any person currently employed by or on behalf of the SBTC for consulting, training or other services. This includes students, university faculty and staff. An intern being paid by a small business directly or indirectly as part of an internship program is not considered an employee.

Representative of the SBTC - includes all members of the Board, employees, students, interns, consultants, volunteers, and university faculty and staff who represent the SBTC in various settings.

Volunteer - A person who acts as a representative of the SBTC by providing consulting to SBTC clients at no fee.

Gift - real property or tangible and intangible personal property of material value, which is provided directly or in trust for the benefit of the recipient. Included in this definition are the similar terms included in paragraph 3 below.

### STANDARDS OF CONDUCT:

A. Relations with Clients - no representative of the SBTC:

1. Shall solicit or accept, or appear to solicit or accept, any gift, loan, reward, promise of future employment, favor or service from any client in connection with SBTC projects or contracts;
2. Shall solicit or accept, or give the appearance thereof, any compensation or other monetary remuneration for consulting related services provided a client while acting as a representative of the SBTC;
3. Shall recommend to a client the purchase of goods and/or services from a firm in which the SBTC employee has a material or financial interest;
4. Shall accept fees, commissions, gifts or other favors from third parties who have supplied goods and/or services to SBTC clients;
5. Shall solicit the private engagement of his or her services by a client at any time during the term of the client's relationship with the SBTC;
6. Shall release information about any client's relationship with the SBTC, nor any information about the business or personal matters of any client to any person or agency outside the SBTC without written permission of the client; and
7. Shall invest monies, personal services or property in the business of current clients of the SBTC.

B. Consulting Activities - With regard to "moonlighting" or other for-profit activities outside the normal working hours and service delivery of the SBTC, SBTC employees and students and interns receiving compensation for their services to the SBTC will:

1. Assure that the outside activity does not interfere with the full performance of their responsibilities;
2. Assure that they are not competing (nor appear to be competing) with the SBTC's ability to provide these services while engaged in the proposed outside activity;
3. **Notify, in writing and in advance, the SBTC Executive Director advising of the nature of the proposed or current activity and any potential for conflict of interest which might arise from it and receive the approval of the SBTC Director to engage in such activity;**
4. Assure that his or her SBTC position is not used to arrange, or appear to arrange, the eventual utilization of his or her service for private gain.

Penalties and Grievances: Generally, penalties for violation of any of these policies may include, but not be limited to, reprimand, suspension and/or termination of employment or other relationship(s) between the representative and the SBTC.

Action: Each representative of the SBTC shall read and certify his/her understanding of and agreement to abide by the requirements of this policy. A copy of this agreement will be signed by each current representative of the SBTC and by new representatives at the time of their association with the program. Copies of this agreement will be maintained in the SBTC's files for a period of three years after termination of an employment with an employee or other relationship(s) between any representative and the SBTC.

I have read and agree to the terms contained in the SBTC Code of Ethics, Personal Conduct and Conflict of Interest policies:

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Signature

Date