

AMERICAN SCHOOL OF CLASSICAL STUDIES AT ATHENS
Conflict of Interest Policy
October 28, 2005
(revised November 6, 2019)

The Trustees of the American School of Classical Studies at Athens affirm that the trustees, officers and other employees of the School have an obligation to exercise their authority and to carry out the duties of their respective positions for the sole benefit of the School. They should avoid placing themselves in positions in which their personal interests are, or may be, in conflict with the interests of the School. Where a potential conflict of interest exists, it shall be the responsibility of the person involved or any other person with knowledge to notify one of the following four officers of the potential conflict: the President of the Trustees, the Treasurer of the Trustees, the Chair of the Managing Committee, or the Director of the School; if the person having the potential conflict is one of those four officers, one of the other three officers shall be notified. Until and unless it is determined that there is no conflict of interest, the person having the conflict or potential conflict shall refrain from participating in any way in the matter to which the conflict relates.

Areas of potential conflict are:

- 1. Financial Interests.** Ownership by an individual of a material financial interest in, or receipt of remuneration from, any business or other entity (a) from which the School obtains goods or services or (b) which is a competitor of the School in the purchase or sale of property or any property right or interest.
- 2. Inside Information.** Disclosure or use by an individual of confidential information about the School, its activities or intentions, for the financial benefit or other advantage of the individual.
- 3. Non-Financial Conflicts.** Action by an individual on his or her own behalf, or as representative (whether as officer, director, partner, trustee, agent, employee or otherwise) of any person, business or other entity, in any transaction or activity which involves the School as an adverse party or with adverse interests.
- 4. Gifts and Favors.** Acceptance by an individual of gifts or favors from any person, business or other entity which does or seeks to do business with, or is a competitor of, the School under circumstances which imply reasonably that such action is intended to influence the individual in the performance of the individual's duties. Or, conversely, giving of bribes, gifts or favors to another person, business, or entity, or to a foreign or domestic government official, by any School employee, Board member or agent of the School acting on behalf of the School, for the purposes of obtaining or retaining business or securing a favorable business or other outcome for the School or the individual. The giving of bribes by U.S. organizations and their employees and agents is strictly forbidden under the Foreign Corrupt Practices Act (FCPA) of 1977 (as revised in

1988).

5. Indirect Conflicts. If a relative or associate of an individual has a conflict or potential conflict with the School (as defined in paragraphs 1–4 above), that conflict shall be deemed also to be a conflict or potential conflict of such individual. An “associate” includes any person, corporation, partnership, trust or other entity in which the individual or relative (a) is an officer, director, partner, trustee, employee or other official, or (b) has a financial interest that enables him or her, acting alone or in conjunction with others, to exercise control or to influence policy significantly, or (c) has any other material association.

6. Acknowledgement of Conflict of Interest Policy. Upon first being elected, appointed or hired, each trustee and officer, and each employee with budgetary, purchasing or negotiating authority shall receive a copy of this policy statement and acknowledge his or her receipt thereof and agreement to comply therewith. Such acknowledgement and agreement shall be renewed annually and records of the same shall be kept in appropriate School files.

7. Interpretation and Administration. This policy statement shall be interpreted and applied in a manner that will best serve the interests of the School. The officer initially notified of a potential conflict (i.e., the President of the Trustees, the Treasurer of the Trustees, the Chair of the Managing Committee, or the Director of the School) shall refer the potential conflict to the Executive Committee of the Trustees, which shall either determine that a conflict does or does not exist or refer the potential conflict to the full Board of the Trustees for such determination. No trustee who is involved in a potential conflict of interest shall be counted in determining the existence of a quorum at any meeting of the Trustees or of the Executive Committee of the Trustees where the potential conflict is considered, nor shall the trustee vote on any action of the Trustees or Executive Committee regarding that potential conflict.