Nicolet College employees are expected to uphold the highest standards of ethical and professional behavior.

**Acceptance of Gifts, Favors, Honoraria, or Paid Expenses**

- No person may offer, give, solicit or receive anything of value to/from an employee, or his/her immediate family and/or organization that would influence or be perceived to be an attempt to influence an employee's official actions, judgments, decisions, or manner of performing his/her duties.
- Gifts from students or vendors either doing business with the College or desiring to do business with the College that are less than $50 in value and could not reasonably be expected to influence any official action, judgment, decision or duty may be accepted.
- Gifts from students or vendors either doing business with the College or desiring to do business with the College that exceed $50 in value will be accepted on behalf of the College and turned over to the College or the Foundation.
- Prior to representing the College, employees must consult with their direct supervisor. After preliminary approval, employees will then submit the Notice of Honoraria or Paid Expenses form to their supervisor. When representing the College, any fees, honoraria or reimbursements tendered must be paid to the College.
- Desk or review copies of textbooks or other free instructional materials are property of the College.
- Any royalties accrued by instructors through the requirement of book purchases by authors to their own students must be donated to the Nicolet Foundation.

**Confidential Information**

An employee may not use confidential information gained in the course of employment other than in the performance of official duties.

**Conflict of Interest**

Employees must avoid a conflict of interest, or the appearance of a conflict of interest, between personal interests and public responsibilities.

A conflict of interest could exist:

- When an employee influences, or is in the position to influence, either directly or indirectly, College business or other decisions in ways that could lead to gain for the employee, his/her immediate family, or any third party.
• When an employee uses the College facilities, equipment, supplies, or reputation for personal gain or to sell goods or services.
• When an employee’s behavior impedes the operations of the College.

**Fraud**

Fraud includes any willful or deliberate act committed with the intention of obtaining an unauthorized benefit, such as money or property, by misrepresentation, deception, or other unethical means.

• Knowingly making false allegations of fraudulent behavior with the intent to cause harm to another individual is subject to disciplinary action, up to and including termination of employment. All employees are expected to report any suspected instance of fraud.

**Nepotism**

Nepotism is favoritism shown to a family member. Employees may not engage in any form of nepotism.

An employee cannot be directly involved in employment-related processes, supervision, or decisions impacting a family member.

**Integrity of Records**

Records and accounting information must be accurate and maintained with reliability. Falsifying records or information, or being a party to the falsification of records or information, is prohibited. Intentionally destroying records maintained by the College is also a violation. Employees who have knowledge of false or inaccurate records and accounting information must report this information to their supervisor or the Director of Human Resources.

**Ownership Interests**

No employee or business in which an employee owns or controls, directly or indirectly, at least 10% interest may enter into a lease of real property or sale of services with the College, except that the Nicolet College Board of Trustees, upon request, may waive this prohibition where it is in the best interests of the College.

**Reporting Procedures**

Employees who have any knowledge or reason to suspect that any type of conduct which violates this policy has occurred will notify his/her immediate supervisor or another administrator immediately.

1 Family for the purpose of this policy is defined as: spouse, domestic partner, mother, father, son, daughter, brother, sister, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, sister-in-law, step family, grandparent and legal guardian or other person who stands in place of a parent.
**Whistleblower Protection**

All employees are assured that no retaliation of any kind is permitted against any employee for complaints or concerns brought forward in good faith. No employee will be adversely affected because the employee refuses to carry out a directive which would aid or assist in fraud or unethical conduct covered by this policy, or which would enable or contribute to a violation of law.

It is a violation of this policy to retaliate against or penalize any individual for reporting in good faith a violation of this policy or for cooperating, giving testimony, or participating in an investigation, audit, proceeding or hearing related to this policy. Appropriate disciplinary action up to and including discharge will be taken against those found retaliating against the employee.