

Code of Business Ethics and Conduct

WPI is committed to responsible and ethical conduct in the classroom, the workplace and the laboratory. This commitment is reflected in many of WPI's policies and procedures. Those policies and procedures serve the dual purposes of delineating WPI's core values and promoting conformance to applicable laws and regulations.

WPI believes that it is important for members of the WPI community to be aware of these policies and procedures and for individuals and organizations outside of the WPI community to know of WPI's dedication to responsible and ethical practices and conduct. This statement brings together WPI's policies and procedures that, individually and taken as a whole, embody such commitment, and it serves as WPI's Code of Business Ethics and Conduct under federal law.

No code can foresee every situation in which a question about ethical or business conduct will arise. If you have questions, require resources or advice, or have observed or suspect violations of WPI policy, you are encouraged to contact any of the following offices:

- [Office of Sponsored Programs](#)
- [Office of the General Counsel](#)
- [Division of Talent & Inclusion](#)
- [Office of Finance & Operations](#)
- [WPI Ombuds Office](#)

WPI has also established an anonymous reporting hotline hosted by a third party vendor called Ethicspoint, which you may access by clicking [HERE](#).

I. Personal Conduct and Responsibility to Other

Personal Conduct

WPI promotes the principle that every person brings unique qualities and talents to the community and that every individual should be treated in a respectful manner. All members of the WPI community are expected to conduct themselves with professionalism, personal integrity, and respect for the rights, differences, and dignity of others. These standards of personal conduct apply to all communications, whether oral, written, or in gestures. Community members are also expected to treat the property of both WPI and other community members with appropriate care and respect.

Related WPI Resources:

- [Notice of Non-Discrimination](#)
- [Interim Title IX & Sexual Misconduct Policy](#)

Discrimination & Harassment

WPI is committed to providing a living, working and learning environment that is free from discrimination and harassment.

WPI will promptly and equitably investigate any complaint of unlawful discrimination or harassment and take appropriate action. Discipline for discrimination or harassment may include, but is not limited to reprimand, suspension, demotion, transfer, and termination. If WPI determines that harassment or discrimination occurred, corrective action will be taken to effectively end the harassment. As necessary, WPI may monitor any incident of harassment or discrimination to ensure the inappropriate behavior has stopped.

Related WPI Resources:

- [Notice of Non-Discrimination](#)
- [Interim Title IX & Sexual Misconduct Policy](#)
- [Bias Response Program](#)

Retaliation

WPI prohibits and will not tolerate any form of retaliation against persons who have complained about, or participated in, an investigation of a complaint related to business ethics and conduct. This may include, for example, a complaint concerning a violation of a WPI policy (e.g., [WPI's Policies on Faculty Conduct](#), [Research Conduct](#), discrimination and harassment, or [Title IX & Sexual Misconduct](#)). In all cases, WPI will follow up as necessary to ensure that no retaliation occurs for persons who have complained about, or participated in an investigation of a complaint about, discrimination or harassment.

Responsibilities of Supervisors

Employees have the responsibility to review and understand all applicable policies and procedures with respect to their business conduct. Furthermore, supervisors must fairly administer WPI and departmental policies concerning employees, setting work standards, and providing an inclusive environment that fosters open communication regarding work-related issues. Supervisors are expected to oversee their employees' performance – managing and evaluating work, providing feedback, recognizing work well done and addressing unsatisfactory performance – and to provide opportunities for professional growth and development.

II. Conflict of Interest and Commitment

It is WPI's policy that its officers, faculty, staff, and others acting on its behalf have the obligation to avoid ethical, legal, financial, research or other conflicts of interest and to ensure that their activities and interests do not conflict with their obligations to WPI.

In order to ensure effective administration and adherence to this policy, WPI Trustees, Officers and Key Employees, and faculty and exempt staff must annually acknowledge in writing their knowledge of the applicable policies and disclose actual and potential conflicts of interest and commitment that may exist, or may come into existence in the near future.

For faculty in particular, federal agencies that support research, for example, the National Science Foundation and the Department of Health and Human Services, are concerned about conflicts of interest in federally funded research and have implemented regulations designed to cause institutions to identify and manage, or eliminate, potential conflicts of interest.

Related WPI Resources:

- [Faculty/Exempt Staff Conflict of Interest](#)
- [Consulting Policy \(Faculty Handbook, p. 2-44\)](#)

III. Financial Transactions and Internal Controls

Procurement

WPI's officers, faculty, staff, and others acting on its behalf have the obligation to avoid ethical, legal, financial, or other conflicts of interest and to ensure that their activities and interests do not conflict with their obligations to WPI. Such a conflict may arise if an individual uses his or her position at WPI to influence WPI's relationship with an outside organization in ways that would lead directly to the individual's personal financial gain.

Related WPI Resources:

- [Faculty/Exempt Staff Conflict of Interest](#)
- [Business Expense Policy](#)

Further, personnel involved in the procurement or contracting function are in a position to provide or withhold substantial business from suppliers who serve WPI. They constantly operate under pressure from conflicting sources and must have a highly developed sense of professional ethics to resist these pressures in order to serve WPI in an honorable way while striving to obtain the maximum value for each expenditure. Competitive suppliers are granted equal consideration insofar as state or federal statute and WPI policies permit. All personnel who are involved in the acquisition function at WPI must abide by the [National Association of Educational Buyers' code of ethics](#) (referred to in the policy).

Gifts and Gratuities

Subject to limited exceptions, WPI prohibits WPI employees and their immediate family members from accepting personal gifts or gratuities from vendors, subcontractors, and contractors (referred to in this section as "suppliers"). Gifts that are received should be returned to the vendor as soon as possible. Gifts that cannot be returned as a practical matter or are of insignificant value, such as food and gift baskets, and "de minimus" gifts, such as mugs, tote bags and other promotional items, should be shared with others in your department.

It is WPI's objective to award business to suppliers on the basis of considerations such as quality, service, competitive pricing, and technical abilities. Acceptance of personal gifts or gratuities from suppliers that could be construed as a means of inducing business with WPI is in direct conflict with this objective.

WPI policy prohibits WPI employees from accepting personal gifts or gratuities of any kind from suppliers. This includes the use of property or facilities, gift certificates, entertainment, or other favors of value extended to employees or their families.

Federal regulations, which govern procurement under federal contracts and grants, impose a like prohibition mandated by Public Law 99-634, known as the "Anti-Kickback Enforcement Act of 1986." "Kickback" is defined as any money, fee, commission, credit, gift, gratuity, thing of value, or compensation of any kind that is provided by a supplier, directly or indirectly, to any employee for the purpose of improperly obtaining or rewarding favorable treatment in connection with procurement under a federal contract or grant.

Related WPI Resources:

- [Purchasing Policy](#)
- [Procurement Policies and Procedures: Suppliers](#)
- [Procurement Policies and Procedures: Bids/Quotations](#)
- [Professional Services Policy](#)

WPI-Sponsored Travel Expenses

The basic policy guiding WPI travel expense reimbursement is that WPI employees should neither personally lose or gain financially from travelling on WPI business and their travel should be planned so that their cost will not exceed budgetary limitations.

The level of reimbursement will be sufficient to provide a standard and quality which will adequately meet the needs of the employee for the effective conduct of WPI business. Expenditures considered excessive in amount or non-compliant will be subject to denial and/or reduction.

Related WPI Resources:

- [Travel Policy and Guidelines](#)
- [Business Expense Policy](#)

Financial Irregularities

If a financial irregularity is suspected or discovered, WPI's Controller should be notified. Alternatively, anyone may anonymously and confidentially report activities that may involve unethical or otherwise inappropriate activity or behavior in violation of WPI's established policies and Business Ethics Policy by filing a report with [EthicsPoint](#).

Financial irregularities may include misuse of WPI credit cards (e.g. WPI Purchasing Card), improper expense reimbursements, or other forms of theft.