

**Northern Marianas College
Board of Regents**

SUBJECT:	Board Operations	EFFECTIVE:	August 09, 2013
SECTION:	5000	POLICY NAME:	Employee Code of Conduct
ACCJC Standard/Policy:	Standard III.A.1.d.		

1. Introduction and Application.

This Code of Conduct governs the Northern Marianas College and establishes minimum standards for all employees. The entire College is committed to upholding the highest of professional standards. All College employees must, at all times, comply with all applicable laws, regulations, policies and procedures. Activities that achieve results unlawfully or in violation of applicable policies or procedures or by unethical behavior - including, but not limited to, payments for illegal acts, indirect contributions, rebates, or bribery - are not tolerated and must be reported. All conduct must meet or exceed minimum standards established by applicable law.

2. General Conduct.

The College supports an environment that is free of discrimination or harassment. All College officers and employees are expected to conduct themselves in a businesslike manner. Unlawful consumption of alcoholic beverages or use of illegal drugs, being at work while under the influence of alcohol or drugs, disruptive behavior, unlawful gambling, unauthorized use of public property or resources and other unauthorized activities that disrupt the efficient and economical administration of the College are prohibited. Violation of applicable laws or policies governing possession and use of alcoholic beverages or drugs, including the Drug Free Workplace Act, NMCBR Policy 514 or institution policies, are prohibited. Likewise, sexual or other harassment (including actions contributing to a hostile work environment) in violation of applicable federal or CNMI law or NMCBR 503.1, is prohibited.

3. Conflicts of Interest.

All employees are expected to perform their duties conscientiously, honestly, and in accordance with the best interests of the College. All College officers and employees must comply with applicable federal and CNMI laws. Employees may not unlawfully use their position or the knowledge gained as a result of their position for private or personal advantage. All employees are responsible for their own actions. Any individual who has concerns or questions regarding a perceived or potential conflict or regarding application or interpretation of applicable federal or CNMI law or NMCBR policy is encouraged to communicate with a superior or with legal counsel.

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4. Outside Activities and Employment.

Employees share responsibility for good public relations, especially at the community level. Their readiness to help with religious, charitable, educational, and civic activities brings credit to the College and is encouraged.

However, officers and employees must comply with applicable federal and CNMI laws and policies in Section 500 of the NMCBR Manual. At all times, employees must avoid outside activities that create an excessive demand upon their time and attention, thus depriving the College of their best efforts in fulfilling their job duties or that create a conflict of interest, or an obligation, interest, or distraction that interferes with the independent exercise of judgment in NMC's best interest.

5. College Funds and Other Assets.

Employees who have access to College funds and other assets in any form must follow the prescribed procedures for recording, handling, and protecting money and other assets as detailed in applicable College procedure manuals or other explanatory materials. Any person who has information concerning possible fraud or dishonesty shall immediately report such information to a superior or to legal counsel.

Employees responsible for spending or approving expenditure of College funds or incurring any reimbursable expenses must comply with all applicable laws and policies and use good judgment on behalf of the College to ensure that good value is received for every expenditure. College funds and all other assets are for College purposes only and not for personal use or benefit. College or other public equipment, supplies and other property or assets may not be used for private or personal use, except as authorized under NMCBR Policy 511.4 or other applicable law or policy.

6. College Records and Communications.

Accurate and reliable records of many kinds are necessary to meet College legal and financial obligations and to manage the affairs of the College. College books and records must reflect in an accurate and timely manner all business transactions. College officers and employees responsible for accounting and recordkeeping must fully disclose and record all assets and liabilities and exercise diligence in enforcing these requirements. Employees must not make or engage in any false record or communication of any kind, whether internal or external, including, but not limited to, false expense, attendance, enrollment, financial, or similar reports and statements, or false advertising, deceptive marketing practices, or other misleading representations.

7. Dealing with Outside People and Organizations.

Employees must take care to separate their personal roles from their College positions when communicating on matters not involving College business. They may not use College

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identification, stationery, supplies, and equipment for personal or political matters. When communicating publicly on matters that involve College business, employees may not represent that they speak for the College, unless that is one of their duties or they are otherwise authorized to do so. When dealing with anyone outside the College, including public officials, employees must take care not to compromise the integrity or damage the reputation of the College.

8. Prompt communications.

In all matters involving communication with College students, customers, suppliers, government authorities, the public and others, College officers and employees must endeavor to make complete, accurate, and timely communications and respond promptly and courteously to all proper requests for information and complaints.

9. Privacy, Confidentiality and Open Records

College officers and employees must at all times comply with applicable laws, regulations and NMCBR policies concerning privacy, confidential records, access to open records and records retention.

10. Reporting Suspected Violations; Procedures for Investigating Reports.

Employees shall report suspected violations of this Code to their superior, some other senior manager or administrator or legal counsel. Any employee who makes a report in good faith shall be protected against retaliation of any kind and any employee who retaliates or attempts retaliation in response to a good faith report shall be subject to dismissal or other discipline. Failure to report known or suspected violations is in itself a violation and may lead to dismissal or other disciplinary action.

Board members who have information concerning a possible violation of this Code or are uncertain about application or interpretation of any legal requirement should report the matter to the president, legal counsel or to the CNMI attorney general.

Alleged violations of this Code involving College employees shall be investigated by the appropriate College officer. All officers and employees shall cooperate in investigations of alleged violations. A violation of this Code is cause for dismissal or other appropriate disciplinary action, in addition to any criminal or other civil sanctions that apply.

11. Institution Codes.

The College shall adopt and implement a Code of Conduct consistent with this Code and Committee of Sponsoring Organization of the Treadway Commission (COSO) standards. The Code shall include: Again, this goes into an operational section

- a. The people or groups of people affected;
- b. A brief description or list of key behaviors that are accepted and not accepted;
- c. How to identify and resolve conflicts of interest;

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- d. How to report violations and to whom;
- e. Consequences of violating the Code;
- f. Consequences of failure to report known or suspected violations; and
- g. How reports will be investigated.

The College shall require that each new employee review the Code of Conduct and sign a statement certifying the employee has read and agrees to comply with the Code. Further, all benefitted employees are required to annually certify in writing or electronically that they have read and are in compliance with the Code of Conduct.

HISTORY:	
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