Code of Ethical Conduct

I. Purpose and Scope

Northeastern University encourages and expects all members of the community to conduct themselves according to the highest ethical standards. All of our endeavors – research, academic, business, athletic, community relations and student affairs – must be grounded in ethical principles, conducted according to the utmost standards of integrity, and carried out in compliance with legal and regulatory requirements and university policies. The core principles articulated in this code encompass the values that underlie all university activities and inform our decision making.

This Code of Ethical Conduct applies to Northeastern University trustees, officers, faculty, staff, students, and also volunteers and agents when they speak or act on behalf of the University.

II. Definitions

N/A

III. Code

A. Compliance with Laws, Rules, and Regulations

Following the law, both in letter and in spirit, and doing the right thing, are the foundations on which the university’s ethical standards rest. In carrying out our official responsibilities, or otherwise conducting business or activities associated with the university, we are all expected to comply with applicable laws, regulations, and university policies. Guidance from a designated university office, department, or supervisor should be sought wherever there is a question regarding lawful or ethical behavior and practices, and/or legal or other compliance matters.

B. Good Faith Conduct and Accountability

All of us are expected to be truthful in our work, words and actions, and to act in good faith in connection with university endeavors. This includes being familiar with and following university policies
and procedures, and taking responsibility for our own part in upholding the university’s standards and reputation for integrity.

C. Respect for the Rights and Dignity of Others

Northeastern University is an institution dedicated to the pursuit of excellence and facilitation of an environment that fosters this goal. Central to that institutional commitment is the principle of treating others civilly and professionally. The university values the safety, privacy, property, personal rights and dignity of others. It endeavors to promote a community free from illegal or inappropriate conduct, including threats, violence, harassment, intimidation, coercion, and discrimination.

D. Avoiding Conflicts of Interest

All members of the Northeastern University community are expected to avoid actions or engagements that are in conflict with their position within the Northeastern community, or that create the appearance of a conflict of interest between personal and/or external interests and the interests of the university. That means, among other things, that they should avoid situations where a financial or other consideration may compromise or appear to compromise their ability to carry out their responsibilities to the university.

Trustees and employees must report potential conflicts, may not use their position for personal advantage, and may not engage in supplemental activities that undermine their ability to perform their jobs for the university.

E. Protection and Proper Use of University Assets

We are all required to maintain the confidentiality of nonpublic university information, records, and data entrusted to us, except when disclosure is authorized by an appropriate official of the university and/or authorized or required by law.

We are likewise required to safeguard university property and other assets, and to use them responsibly and properly -- that is, within the accepted parameters of use and permissions. Unauthorized access, use or disclosure of university records or assets, including but not limited to misappropriation, forgery, and falsification or fraudulent alteration of university records, are all prohibited.

IV. Additional Information

A. Reporting Known or Suspected Violations

University trustees and officers are required to report promptly any known or suspected violations of this Code to the Chairman of the Board or Director of Internal Audit. All other members of the community should report concerns to a supervisor, manager, dean, director or department head, as appropriate. Northeastern University also uses an independent third party company, EthicsPoint, to provide an anonymous compliance “hotline” for all members of
the university community. For more information or to make a report, Click here

B. Seek Specific Guidance

More detailed university policies, such as the Code of Student Conduct, Academic Integrity
Policy, Faculty Handbook, Equal Opportunity Policy, and Professional Standards and Business
Conduct Policies, which address specific situations and have specific applicability, rest on the
above principles. Of course, no code or policy can be expected to include every possible set of
circumstances. We all have the responsibility to seek guidance and clarification from the
appropriate office, department or supervisor for any questions pertaining to compliance with
laws, policies, or these ethical principles.

C. Non-Retaliation

The university will not tolerate retaliation or discrimination against anyone who makes a good
faith report of a suspected violation of law, regulation, or university policy, including this Code
of Ethical Conduct. All reports submitted to EthicsPoint are protected under the Whistleblower

V. Contact Information

Compliance Department: 617-373-5893 or j.mcnally@neu.edu

Office of Internal Audit: 617-373-4041, or internal_audit@neu.edu

University Ombuds: 617-373-3362 or email ombuds@neu.edu.

EthicsPoint Compliance Hotline: 1-855-350-9390