



VILLANOVA UNIVERSITY CODE OF CONDUCT

PURPOSE

This University-wide Code of Conduct (Code) sets forth the basic standards of workplace behavior that are expected from all University employees, including but not limited to senior leadership, faculty, staff, student employees (undergraduate or graduate students), visiting faculty, and contractors; and states the University's commitment to compliance with all applicable laws, regulations, and policies. Compliance is a shared obligation across the University as each Community Member has a responsibility to ensure that their conduct complies with all University policies and procedures, including the Code; contractual obligations; and pertinent Federal, State, and local laws and regulations.

The Code includes references to certain relevant University policies, procedures, and other resources; however, these references are not exhaustive, and documents referenced may be updated as appropriate.

The Code may be used as an aid in the interpretation of University policies but does not change or expand the scope or coverage of any policy. Villanova Community Members are expected to review and be familiar with all handbooks, policies and procedures, and contractual obligations applicable to their employment with the University.

The phrases **Villanova Community Members** or **Community Members** refer to all Villanova University employees, including senior leadership, faculty, staff, student employees, visiting faculty, and contractors.

STATEMENT OF ETHICAL AND ADMINISTRATIVE CONDUCT

Villanova University is a Catholic Augustinian community of higher education, committed to excellence and distinction in the discovery, dissemination, and application of knowledge. Inspired by the life and teaching of Jesus Christ, the University is grounded in the wisdom of the Catholic intellectual tradition and advances a deeper understanding of the relationship between faith and reason. Villanova emphasizes and celebrates the liberal arts and sciences as foundational to all academic programs. The University community welcomes and respects members of all faiths who seek to nurture a concern for the common good and who share an enthusiasm for the challenge of responsible and productive citizenship in order to build a just and peaceful world. In pursuit of this mission, we commit ourselves to academic excellence, to our values and traditions, and to our students, alumni, and the global community.

To ensure the continued excellence of the University and its reputation, all Villanova Community Members are responsible for sustaining the high ethical standards of the institution, and of the broader community in which we function. The University strives to integrate the Augustinian values, Veritas, Unitas, Caritas (Truth, Unity, Love), into education, research, and business practices. Villanova is committed to upholding the ethical, legal, and professional standards as the

basis for our actions; and as a community, we are both individually and collectively accountable for our actions.

The University, through its established policies and procedures, seeks to ensure that Villanova Community Members fulfill their responsibilities, duties, and obligations consistent with legal and regulatory requirements and conduct themselves in the best interests of the University. Each Villanova Community Member must be cognizant of, and comply with, the University's relevant policies, procedures, local and state laws and regulations that pertain to the University, and our respective positions and activities. If there are questions about or uncertainty regarding the applicability of policy, legal, or regulatory requirements, Community Members, should seek assistance from their supervisor, contact the University Compliance Office, or the Office of the Vice President and General Counsel.

Villanova managers and supervisors are responsible for learning and following the University policies, and legal, regulatory, and contractual requirements that pertain to their areas of oversight and responsibility, and for ensuring that each Community Member under their purview has adequate knowledge of the applicable policies, procedures, contractual obligations, and laws and regulations to perform their work correctly and in a compliant manner.

All Villanova Community Members are expected to uphold this Code. Violation of this Code will result in appropriate disciplinary action, up to and including dismissal from employment, or (in the case of outside contractors) severance of the relationship with the University.

INTEGRITY, ETHICAL CONDUCT, AND RESPECT FOR OTHERS

The University expects Villanova Community Members to comply with all state, local, and federal statutes, rules, and regulations when conducting University business. To that end, the University prohibits and does not tolerate illegal, dishonest, or fraudulent conduct of any nature. Detailed descriptions of "illegal, dishonest, or fraudulent conduct", can be found in the [Policy Prohibiting Illegal, Dishonest, or Fraudulent Conduct](#). All members of the University community, including all of those who do business with the University, are expected to uphold this policy.

Villanova Community members are responsible for creating a community, where mutual love and respect for individual differences guide our community and every aspect of university life. While all examples of expected behavior cannot be listed, all Villanova Community Members are expected to act in a professional manner and treat others fairly and with respect and courtesy.

In support of the University's values, Veritas, Unitas, Caritas (Truth, Unity, and Love), each Villanova Community Member is expected to:

1. Create a welcoming, safe, and supportive community where the dignity of each person is valued, respected, and celebrated.
2. Uphold the dignity of others in all communications, whether verbal, written, or digital.
3. Exhibit respect for others as the central principle that governs interactions between each Community Member.

Villanova University seeks to foster and maintain a community of mutual respect and concern for all of its members and prohibits all forms of sexual misconduct as defined in the [Villanova University Sexual Misconduct Policy](#).

CONFIDENTIALITY AND PRIVACY OF INFORMATION

Villanova Community Members receive and produce various types of confidential, proprietary, sensitive, and private information on behalf of the University. All Community Members are expected to comply with all applicable rules, laws, and regulations (i.e., federal, state, local, and foreign), contractual obligations, and University policies/procedures that pertain to the use, protection, handling, access, retention, and disclosure of such information.

When disaffiliating from the University, Community Members must return University data/information, without copying such information, unless an exception has been granted by pertinent University leadership.

BUSINESS ETHICS

All employees are expected to conduct the University's business with integrity, in compliance with applicable laws and regulations, and in a manner that excludes consideration of personal advantage, and shall:

- Neither seek nor accept for themselves or for the benefit of others, any gifts (other than those of nominal value which are associated with customary business practices), loans (other than conventional ones at market rates from lending institutions), favors (other than ordinary social amenities), services or payments from any person or enterprise which does or seeks to do business with or is a competitor of the University.
- Not provide others at University expense with gifts, favors or entertainment unless they are consistent with customary business practices, are not excessive in value, and are not in contravention of applicable law or ethical standards.
- Not give or release, without proper authority, any data or information of a confidential nature obtained through University employment or anyone not authorized to receive such data or information.
- Not use nonpublic data or information obtained while in the University's employment for personal profit.
- Not make any contribution of University funds, property or services to any political party or committee, or to any candidate for or holder of any local, state or national governmental office.

Please refer to the 'Reporting Non-Compliance' section below for channels to communicate actual or perceived issues.

STEWARDSHIP AND USE OF UNIVERSITY RESOURCES

Villanova is committed to upholding the highest standards of honest behavior, ethical conduct, and fiduciary responsibility with respect to University funds, resources, and property.

Community members are expected to: use University property, equipment, financial resources, materials, email, software and other systems, and other University resources only for legitimate University purposes, in accordance with University policies and procedures; prevent waste; preserve and protect University assets by making prudent and effective use of University resources; and follow sound financial practices including accurate reporting and protection of assets.

The University has established and continues to establish controls, standards, and procedures to ensure that assets are protected and properly used and that financial records and reports are accurate and reliable. All Community Members share the responsibility for maintaining and complying with required internal controls. With respect to accounting standards and record keeping, employees shall document all transactions in a manner that clearly describes and identifies the true and complete nature of the transactions.

CONFLICTS OF INTEREST (COI) & CONFLICTS OF COMMITMENT (COC)

Community Members have an obligation to be objective and impartial in making decisions on behalf of or in relation to the University. All decisions and actions taken by Community Members in the conduct of University business, research, and teaching, must be done in a manner that promotes the best interests of the University and does not interfere with their primary obligations to the university.

Community Members are required to disclose actual and perceived conflicts of interest in accordance with the procedures outlined within the [Conflicts of Interest and Business Ethics Policy](#).

Faculty members should also refer to the Faculty Handbook policy on Consulting, Outside Teaching, and Professional Work for University expectations around outside professional activities, and the Faculty Handbook Conflict of Interest policy which sets forth Faculty-related COI expectations and procedure for seeking approval for outside activities.

Faculty members and other University personnel engaged in or holding duties related to sponsored or other regulated research may have additional disclosure requirements and, in accordance with federal regulations, these interests and other outside commitments must be disclosed and adequately managed, reduced, or eliminated, as appropriate under the specific circumstances.

The [Financial Conflict of Interest in Research](#) Policy sets forth the University's disclosure requirements and the disclosure review and conflict management processes.

ACADEMIC FREEDOM

The University seeks to reflect the spirit of St. Augustine by the cultivation of knowledge and the encouragement of freedom of inquiry; by respect for individual differences; and by adherence to the principle that mutual love and respect should animate every aspect of University life. As stated in the Academic Freedom policy, "As a necessary condition for fulfilling their duties and functions as teacher-scholars, all faculty members (tenured, tenure-track, non-tenure-track full-time, or part-time adjunct) are entitled to full academic freedom in teaching, in research, and in disseminating the products of their scholarship." Please note that the information above is an

excerpt from the University's Academic Freedom policy. For complete details, please refer to the [Academic Freedom](#) policy.

RESPONSIBLE CONDUCT OF RESEARCH

"Villanova University relies on its faculty to establish and maintain the highest standards of ethical practices in academic work including research. All individuals engaged in research at Villanova University are responsible for adhering to the highest standards of intellectual honesty. Faculty members and supervisors of research personnel (including graduate students) have a special obligation to set an example and create an environment that encourages absolute intellectual integrity. Any form of fraud, falsification, cheating, plagiarism, intellectual dishonesty, or misuse of funds in the conduct of research undermines basic academic goals and serves to diminish the credibility established by the University in its constituents. Villanova University condemns misconduct in research and has established procedures to investigate allegations of misconduct as set out in this Policy" ([Research, Misconduct](#) Policy - Faculty Handbook).

PROPRIETARY INFORMATION & THE USE OF VILLANOVA'S NAME AND MARKS

Members of the University Community are required to ensure that intellectual property rights, including patents, trademarks, copyrights, and software, are maintained, preserved, and protected in accordance with the applicable policies included within the Faculty Handbook and the University's [Intellectual Property Policy](#).

The use of Villanova's name, marks, and images, including use of Villanova's name and marks on social media, must be handled in accordance with the University's [Endorsements and the Use of Villanova's Names and Marks](#) Policy.

SIGNATORY AUTHORITY RESPONSIBILITIES

Accepting an agreement or contract, including sponsored project funding, may create a legal obligation on part of the University, and requires compliance with the terms and conditions of the agreement and any applicable laws and regulations. Therefore, only those Community Members with signatory authority per the [University's Approval, Signing Authority and Contract Review Procedure](#), may enter into agreements or contracts on behalf of the University. Further, agreements and contracts are required to be reviewed by pertinent personnel as outlined in the above-noted policy.

HEALTH AND SAFETY

Community Members have a shared responsibility to ensure a safe working environment and to protect the health and safety of those within the community, including visitors and minors on campus. This responsibility includes adhering to all applicable laws, regulations, and University policies and procedures; completing required health and safety-related trainings; and reporting unsafe conditions and/or processes to an immediate supervisor or through other appropriate reporting processes as outlined in applicable policies and procedures.

RESPONSE TO GOVERNMENT OR OTHER EXTERNALLY INITIATED INVESTIGATIONS, AUDITS OR REQUESTS

Villanova is committed to cooperating with government investigators, entities, and auditors as required by law. If an employee receives a notification, request, or communication related to an external audit or review, investigation, background investigation, request for documentation or internal policies, or a request for completion of a Government entity report, before taking any action, the employee must immediately contact the Office of the Vice President and General Counsel.

REPORTING NON-COMPLIANCE

Villanova Community Members are expected to seek clarifications about possible non-compliance and to report in good faith actual and possible violations of laws, regulations, policies and procedures, and contractual obligations. In some situations, mandatory reporting is required.

The University has several methods for inquiry and reporting and prohibits any form of retaliation against those who report actual or suspected violations in good faith. All reports will be reviewed and investigated to the extent deemed necessary to gather relevant facts to aid in determining whether a violation has occurred and whether disciplinary action is warranted. Villanova Community Members are expected to participate in investigations to ensure all concerns can be properly reviewed and resolved appropriately.

Typically, the best place to initially raise a concern or ask a question is within your own college/school or department through supervisory or department channels. However, if that is not a viable option, the Office of Human Resources and the University Compliance Office are resources available to all Villanova Community Members, as well as [EthicsPoint](#). EthicsPoint is a contracted service that provides Community Members with an anonymous and confidential reporting tool to report actual or suspected violations of law or University policy.

RELATED INFORMATION/FORMS

Please note that the list below is a selective inventory of University policies, Handbooks, and guidance materials. This is not an exhaustive list; Villanova Community Members are expected to review all applicable University Handbooks, University policies and procedures, and Departmental policies, guidelines, and/or Handbooks relevant to their employment relationship with the University.

Please call or email the [University Compliance Office](#) for assistance with accessing University-wide policies referenced within the Code.

Handbooks:

Villanova University [Full Time Faculty Handbook](#)

Please note: the Full-Time Faculty Handbook contains a section on Full-Time Faculty Employment Agreements

[Adjunct Faculty Handbook](#)

[Staff Handbook](#)

Relevant Policies:

[Academic Freedom](#)

[Business Travel Expenses Policy](#)

[Child Abuse Reporting Policy](#)

[Compliance with U.S. Export Controls Laws Policy](#)

[Confidentiality Statement](#)

[Conflicts of Interest and Business Ethics Policy](#)
[Copyright Infringement and Illegal File Sharing](#)
[Disclosure of Student Records](#)
[Email Policy](#)
[Acceptable Use Policy - Employee](#)
[Endorsements and the Use of Villanova's Names and Marks](#)
[Events and Speakers Policy](#)
[Financial Conflict of Interest in Research](#)
[General Procurement Standards](#)
[Information Security Policy](#)
[Information Security Awareness Policy](#)
[Intellectual Property Policy](#)
[Language Use: Written and Oral Communications on Campus](#)
[Non-Discrimination/Non-Harassment Grievance Procedure for Faculty and Staff](#)
[Non-Discrimination and Non-Harassment Policy](#)
[Personal Use of Villanova-Provided Vehicle](#)
[Policy on Approval of Capital Projects](#)
[Policy Prohibiting Illegal, Dishonest, or Fraudulent Conduct](#)
[Procurement Card Policy](#)
[Policy on Gifts](#)
[Reporting Foreign Gifts and Contracts Policy](#)
[Research, Misconduct](#)
[Responsible Conduct of Research](#)
[Restricted Parties Screening Review](#)
[Retention and Management of University Records](#)
[Technology Ownership Policy](#)
[Use of University Property](#)
[Acceptable Use Policy - Vendor](#)
[Villanova University Approval Signing Authority and Contract Review Procedure](#)
[Villanova University Sexual Misconduct Policy](#)
[Villanova University's Amended and Restated Policy Concerning Potential Conflicts of Interest](#)
[Website Privacy Policy](#)
[Workplace Violence Policy](#)

Webpages:

[Office of the President](#)
[Human Resources](#)
[Office of the Provost](#)
[Office of Grants and Contracts](#)
[Office of Research Protections](#)
[Office of the Vice President and General Counsel](#)
[Research Administration Offices](#)
[Sexual Misconduct Prevention and Response](#)
[Title IX](#)
[University Compliance Office](#)
[Department of Public Safety](#)
[Environmental Health and Safety \(EHS\)](#)
[The Office of the Ombuds](#)

Additional Resources:

- [Villanova Policy Library - Licensed Users](#) (VU Staff & Full-Time Faculty)
- [Villanova Policy Library - Public Access](#) (Adjunct Faculty)
- [Federal and State Notices](#)
- [EthicsPoint Hotline Website](#)
- EthicsPoint Hotline # - Call toll-free at 855-236-1443

HISTORY

Effective Date: December 1, 2025

RESPONSIBLE UNIVERSITY DIVISION/ DEPARTMENT

University Compliance Officer
University Compliance Office
Picotte Hall at Dundale
800 Lancaster Avenue
Villanova, PA 19085
(610) 519-5466

Vice President for Human Resources
Human Resources
The Villanova Center
789 E. Lancaster Ave., Suite 260
Villanova, PA 19085
(610) 519-7900

RESPONSIBLE ADMINISTRATIVE OVERSIGHT

University Compliance Office
Picotte Hall at Dundale
800 Lancaster Avenue
Villanova, PA 19085
(610) 519-5466