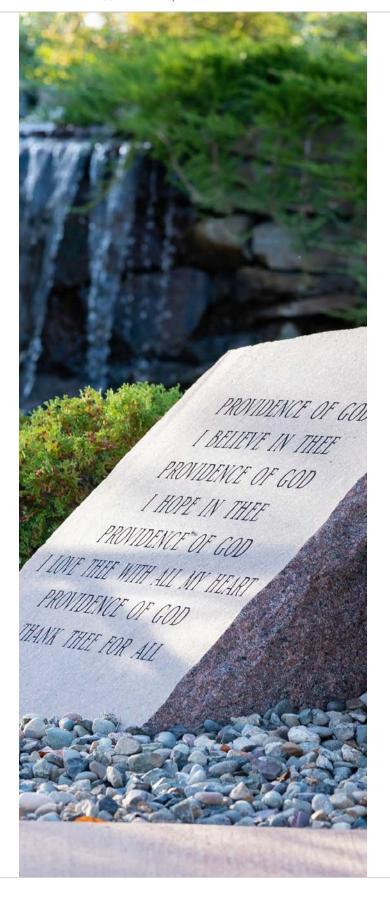


University of Providence Code of Conduct

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UNIVERSITY OF PROVIDENCE REPORTING OPTIONS

For more information

1. Contact Your Immediate Supervisor // 2. Department Manager // 3. UP Compliance Officer

Back Cover

4. Call the 24/7 Integrity Hotline at 888-294-8455 // 5. www.integrityonline.ethicspoint.com



MESSAGE FROM VERY REV. FR. OLIVER J. DOYLE

President of the University of Providence

Dear Friends.

Our work at the University of Providence (UP) is important, sacred work, underpinned by Christian teachings and values, and a strong Catholic identity. Our employees have a significant influence in carrying out our mission to teach, challenge and transform. I am proud of the commitment of our employees to provide high quality learning, teaching, administration and support services.

Our Code of Conduct (Code) has been prepared to enable all employees to share a common understanding of how we expect our employees to act. As employees, we demonstrate our values by behaving professionally and conscientiously and by ensuring that our workplace is safe, supportive, respectful and cooperative.

We are committed to ensuring that our students are safe and protected from harm. This Code provides details on the standard of behavior required of employees in maintaining professional boundaries and high standards of professional conduct in their interactions with students and the community.

I feel confident that employees will familiarize themselves with this Code and the required standards of behavior. Please be assured of my prayerful support for the employees in implementing our shared vision for Catholic education.

Very Rev. Fr. Oliver J. Doyle

President of the University of Providence

UNIVERSITY OF PROVIDENCE MISSION

As an expression of the teaching Mission of Jesus Christ, the Mission of the University of Providence is to provide students with the opportunity to obtain a liberal education for living and for making a living.

The University of Providence was founded through the collaborative efforts of the Sisters of Providence, the Ursuline Sisters, the Catholic Bishop of Great Falls and the civic community, all of whom recognized societal need for higher education. Its educational mission, sponsored by the Sisters of Providence, continues to be the shared endeavor of dedicated people.

The University cooperates with both private and public institutions to attain goals consistent with its educational purpose and values.

The University continually and responsibly evaluates its operation and programs. It develops professional and career programs and continuing education courses designed in view of society's present and future needs, as well as traditional academic degrees in appropriate fields.

The University offers students a foundation for actively implementing Gospel values and the teaching of Jesus within the Catholic tradition; it serves students of all beliefs who wish to take advantage of its programs.

The faculty and staff of the University join with students in a cooperative and enthusiastic search for truth, so that students may develop:

Character - have a positive effect on the world and the communities in which they live and work, particularly by recognizing and accepting personal accountability to themselves, to society and to God;

Competence - further their ability to live full and rewarding lives by becoming competent working members of society who know the basics of their professional field and have access to future learning; and

Commitment - find meaning in life which enables them to participate effectively in society while transcending its limitations, by living according to their own moral and religious convictions, as well as by respecting the dignity and beliefs of other people.

- 1. Contact Your Immediate Supervisor // 2. Department Manager // 3. UP Compliance Officer
- 4. Call the 24/7 Integrity Hotline at 888-294-8455 // 5. www.integrityonline.ethicspoint.com

Why We Have a Code of Conduct

Al the University of Providence, we are committed to 'doing the right thing right' and conducting ourselves with the utmost integrity. The success of the University and the continuing heritage of the Sisters of Providence depend on us building honest and trusting relationships with our fellow employees, students, business partners, regulators and the communities we serve. To achieve our Mission and vision, we commit to conducting all business activities in an honest, fair and ethical manner in all aspects of our campus community.

The University of Providence commitment to integrity is a vital part of who we are as a Catholic education ministry.

In today's operating environment, the rules that govern business practices are more demanding than ever before and require us to keep integrity at the core of all we do in advancing our Mission. It requires a commitment from each of us to conduct our business honestly and ethically, regardless of the situation.

The University of Providence Code of Conduct provides us with a set of standards that guides our decision-making and our commitment to 'doing the right thing right.' This means conducting our business within appropriate ethical, legal and regulatory standards and complying with the University's policies and standards.

In addition to the Code of Conduct, there are institutional policies, procedures and standards that may apply to your work. Copies of these can be obtained through the human resources office.

How Should I Use the Code of Conduct?

The University's Code of Conduct asks you to reflect on our Mission as you apply ethical and legal standards to your work. Our Code of Conduct helps you answer these questions:

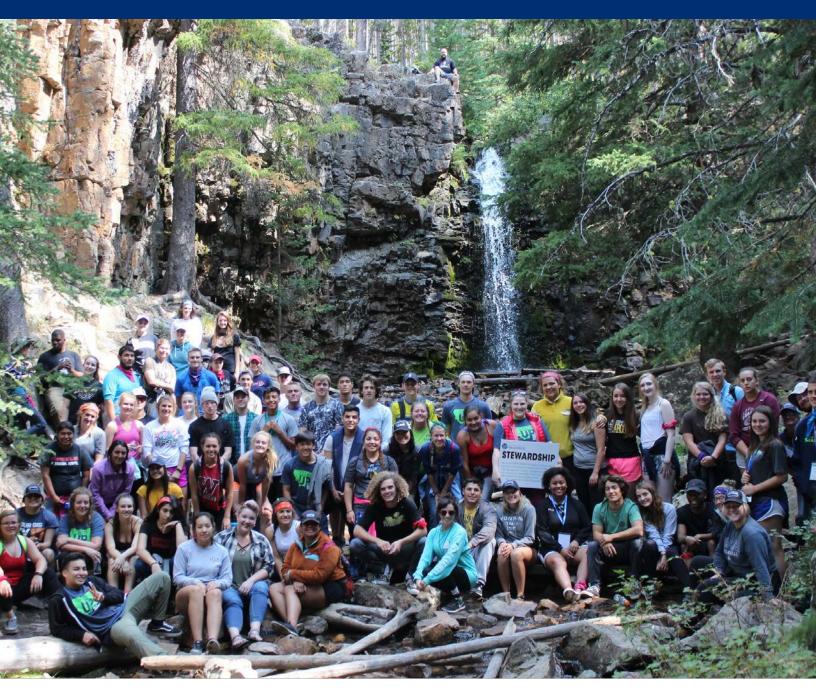
- Are my actions and decisions consistent with the University's Mission?
- Am I supporting the spirit, as well as the letter, of laws, regulations, policies or standards?
- · Can I explain my actions or decisions without embarrassment to family, friends, co-workers or students?
- Would my behavior harm the University's reputation in the community or as a ministry focused on education?
- Whom should I contact if I believe a violation has occurred?
- What do I do if retaliation occurs when I raise a concern?
- Whom should I contact if I still have questions?
- How do I identify and contact UP's Compliance Officer?

Where Can I Find More Information About the Policies Discussed in the Code of Conduct?

This document gives an overview of the policies of the University of Providence. Policies are living documents that are frequently reviewed and updated. Please contact the human resources office for the latest version of a policy. The complete version of the policy will provide you with more details about what is expected of you and how a policy is implemented on campus.

Integrity and Compliance

We communicate openly and we act with integrity.



- 1. Contact Your Immediate Supervisor // 2. Department Manager // 3. UP Compliance Officer
- 4. Call the 24/7 Integrity Hotline at 888-294-8455 // 5. www.integrityonline.ethicspoint.com

Our Commitment

The University of Providence is committed to acting with integrity in all we do. We require compliance with laws and regulations, this Code of Conduct and University policies and standards. These expectations apply to employees, board members, volunteers and others under the direct control of the University. As a ministry of Providence St. Joseph Health, the University works closely with the Providence St. Joseph Health Risk and Integrity Services.

The University's compliance officer manages all risk, integrity and compliance issues at the local level. Since a culture of compliance is important, the University's compliance officer is a direct report to the University President with a dotted line to the UP Board of Trustees.

The University of Providence compliance office, with the support of Providence St. Joseph Health Risk and Integrity Services, is responsible for the day-to-day direction and implementation of these policies and standards. This includes developing resources (policies, procedures, education programs and communication tools) and providing support (managing the Integrity Hotline and other reporting mechanisms, conducting program assessments and providing advice) to employees and others.

The University's human resources staff members are also highly knowledgeable about many of the employment and workplace compliance-risk areas described in this Code of Conduct. You are encouraged to report any concerns about your work situation to human resources. University leaders are expected to investigate and resolve matters relating to employment and workplace situations.

Reporting a Concern

The University of Providence expects that integrity, compliance or legal concerns will be reported promptly. Each University employee has a responsibility to report any activity that appears to violate laws, rules, regulations, standards or this Code of Conduct.

If you have a concern that you believe poses a serious or immediate legal or compliance risk that can significantly affect accreditation or the University or may lead to a major legal claim, report these concerns either directly to the compliance office or to the University's human resources office. Contact information is listed on the back cover. The safety of our students and employees is of paramount importance to the University, and any safety concerns you have should be reported using any of the options listed below.

- Discuss the matter or concern with your immediate supervisor.
- Discuss the matter or concern with the department manager.
- Contact the UP Compliance Officer directly.
- Call the 24/7 Integrity Hotline at 888-294-8455 or use Integrity Online, our web-based (www.integrityonline.ethicspoint.com) reporting option.

You may report concerns anonymously.

If you have tried any of the first three options without success or you feel uncomfortable contacting these people, call the Integrity Hotline or use Integrity Online.

The Providence St. Joseph Health Integrity Hotline and Integrity Online are answered by a third-party company, which sends all reports to the University's compliance officer for investigation. A reporter receives a tracking number to enable him or her to retrieve information about the status of a report.

If you report a concern anonymously, it is important to clearly describe the situation, provide the location and give enough detail so that your concern can be properly investigated and resolved. We may not be able to investigate your concern if you do not provide us with enough actual information.

Confidentiality of Reports

The University will keep the complaint, investigation and resolution as private and confidential as is reasonable and practical under applicable law. What is reasonable and practical may vary with circumstances. Confidentiality may not be maintained if it could create a significant health or safety risk or could significantly impair the University's ability to conduct a complete investigation.

Retaliation Will Not Be Tolerated

The University prohibits retaliation against an employee, student, volunteer or independent contractor for reporting a good faith concern or complaint of discrimination, requesting a reasonable accommodation or for assisting in a complaint or accommodating investigation. Anyone who engages in retaliation or harassment directed at the person who raises a good faith concern or assists in the investigation of a concern is subject to disciplinary action in accordance with the University's policy. If after investigating any complaint or request the University determines that the complaint or request is not in good faith or that an employee has provided false information, the University may take disciplinary action, including termination of employment, against the employee who made the complaint, made the request or gave the false information.

If you believe that retaliation or harassment is occurring, report it to human resources, your local or regional compliance representative or to the Integrity Hotline at 888-294-8455.

Corrective Action

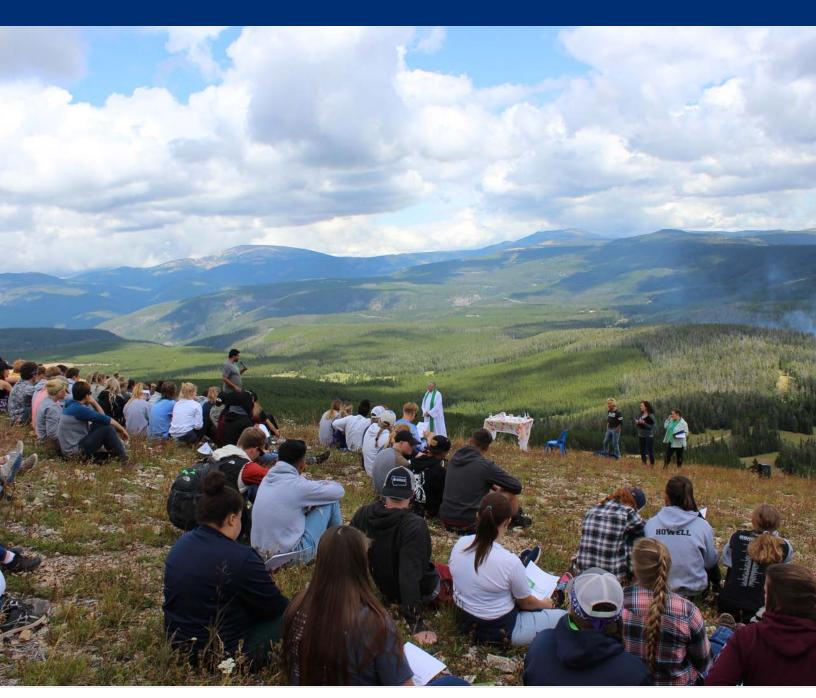
The University expects employees to comply with state and federal law and the University's policies and procedures related to employment, integrity and compliance. Alleged violations will be investigated based upon the facts and circumstances of the violation, and corrective actions will be imposed when necessary. The findings of the investigation and corrective actions reported will be documented according to applicable human resources policies and placed in employment files.

Contact your supervisor or human resources if you have any questions concerning any University policy, practice or condition of employment.

- 1. Contact Your Immediate Supervisor // 2. Department Manager // 3. UP Compliance Officer
- 4. Call the 24/7 Integrity Hotline at 888-294-8455 // 5. www.integrityonline.ethicspoint.com

Working With Each Other

We nurture the spiritual, physical and emotional well-being of one another and those we serve.



FOR MORE INFORMATION, SEE THE BACK COVER.

General Conduct

Employees must possess a personal philosophy compatible with, and desirous of contributing to, the Catholic university environment. Employees must behave in a manner that promotes good public relations tor the University. In all interactions with students, employees are considered mentors and representatives of the University and must conduct themselves appropriately. Employees must exhibit courteous, considerate and professional behavior and language toward students, faculty, visitors, members of the public and other employees. Employees must behave with care and attention to the students' needs and the University's quality standards and requirements. Employees must work in an efficient, economical, confidential and safe manner. Unsatisfactory work performance will result in disciplinary action and possible termination. Employees must maintain professional standards of conduct appropriate to the University's business at all times.

Failure to comply with the University's conduct guidelines or any other guidelines, rules, regulations, policies, procedures or practices of the University, whether in this Code of Conduct or not, may result, at the University's discretion, in disciplinary action being taken, including termination of employment.

Faculty Conduct

As members of the University, and as port of the catholic academic community created by the Sisters of Providence, faculty members aspire to the highest standards of ethical behavior. The spirit of the faculty is grounded in the Catholic ethic of love for all persons and in the belief that all individuals have rights and duties. These include exhibiting and encouraging responsible actions, sensitivity and mutual support among all members of the community.

Faculty members must respect the dignity of others, acknowledge each person's right to express differing opinions and foster and defend intellectual honesty. Students are entitled to an atmosphere conducive to learning. All members of the academic community have the right to fair and just treatment in all situations. Faculty members also strive to be objective in professional judgment of colleagues and assist each member to reach his or her full potential as an educator and member of the University community.

Confidentiality

Employees may not disclose confidential information gleaned from business transactions and must protect confidential relationships between the University and its employees, faculty, students and suppliers. University, employee, faculty, supplier and student information that has not been made public is confidential and an employee may not release confidential information to anyone unless required tor a business purpose of the University or by legal process such as a subpoena or court order.

Employees may not use confidential information tor private interest or personal gain. No employee may remove University information, confidential or not, from the University's property without permission from the employee's supervisor, except in the ordinary course of performing duties on behalf of the University. II 1 ese materials include, without limitation, documents, notes, files, records, computer files or similar materials. The University prohibits employees from attempting to obtain and from possessing confidential information tor which they have not received access authorization. An employee who is unsure about the confidential nature of specific information or the employee's authority to access or use confidential information must ask his or her supervisor tor clarification.

Nothing in this Code of Conduct is intended to restrict employees from discussion, transmission or disclosure of wages, hours and working conditions in accordance with applicable federal and state laws.

Discrimination and Harassment/Sexual Harassment

The University of Providence is mindful of its mission to be a witness to the love of Christ tor all and admits students of any age, race, color, disability, national or ethnic origin, religion, sexual orientation, sex, gender, citizenship status, status as a veteran, or any other characteristic that is protected by applicable state or federal law to all rights, privileges, programs and activities generally accorded or made available to students at the University.

The University is committed to equal employment opportunity and does not discriminate on the basis of age, race, color, disability, national or ethnic origin, religion, sexual orientation, sex, gender, citizenship status, status as a veteran, or any other characteristic that is protected by applicable state or federal law in its operations, employment opportunities, educational programs and related activities.

- 1. Contact Your Immediate Supervisor // 2. Department Manager // 3. UP Compliance Officer
- 4. Call the 24/7 Integrity Hotline at 888-294-8455 // 5. www.integrityonline.ethicspoint.com

Sexual harassment is a form of discrimination and is defined as: (1) unwelcomed conduct, (2) based on a protected class, which (3) either creates a hostile environment or is a condition of working, unwelcomed conduct is verbal or physical behavior that one did not willingly invite or engage in and that one finds unwanted or offensive. Intimidating statements, gestures with sexual overtones, even jokes that others find offensive are forms of harassment if they are based on a person's membership in a protected class.

Harassment includes unsolicited remarks, gestures or physical contact, displays or circulation of written materials or pictures derogatory to any protected group (i.e., based on gender, race, ethnicity, religion, sexual orientation, disability, etc.).

Bullying is participating in any intentional, disrespectful behavior that causes physical emotional or social damage through the abuse of power, intimidation and mistreating somebody weaker or in a more vulnerable situation.

If an employee experiences, witnesses or learns of unlawful discrimination at the University, that employee must immediately report it to his or her supervisor. If the discrimination involves the employee's supervisor, the employee must immediately report it to the head of his or her department, to his or her area vice president, to the University president or designee or to the director of human resources or the Integrity Hotline. The University will investigate all complaints of discrimination. The University will keep the complaint, investigation and resolution as private and confidential as is reasonable and practical under the circumstances.

Workplace Violence

This Code of Conduct confirms the University's commitment to prevent, reduce and manage all acts of violence, while providing a safe environment to work and learn. The University is committed to providing a safe and secure work environment for all employees, students and visitors. Threats, intimidation, harassment, assault or any acts of aggression are prohibited and violate University policy and may result in disciplinary action, up to and including termination.

"Violence- includes, but is not limited to, actual or potential assault, battery, harassment, intentionally threatening, University work location or while engaged in the University's business. The University of Providence does not prohibit an employee from exercising the legal right to defend one's self, another or property.

Health and Safety

The University complies with government regulations and employees must comply with Mont. Code Ann. § 50-71-203. Policies and practices promote the protection of workplace health and safety, and all employees share a responsibility in understanding how these policies and practices apply to our job responsibilities and for seeking advice when there is a question or concern. Additionally, the University is committed to and responsible for ensuring the health and safety of the students entrusted to its care.

We have an obligation to report any serious workplace injury or any situation presenting a danger of injury, so timely corrective action may be taken to resolve the issue. Employees are required to report injuries.

Weapons of any kind are prohibited on campus whether or not a permit is held. This includes, but is not limited to, knives, guns and explosive devices.

Reporting an Accident or Injury

Employees must immediately report all work-related injuries to person and property to their supervisors and complete all paperwork requested by the University. Reports must be mode as soon as possible to the human resource office. Employees must report all emergencies by calling 9-911 if using the University's phone system and 911 if using other phones.

Working With Students

We set the highest standards for ourselves and for the University.



- 1. Contact Your Immediate Supervisor // 2. Department Manager // 3. UP Compliance Officer
- 4. Call the 24/7 Integrity Hotline at 888-294-8455 // 5. www.integrityonline.ethicspoint.com

Fraternization with Students

Employees may not offer or request sexual favors or intimacy, make sexual advances or engage in sexual conduct or intimacy – consensual or otherwise - with a student who is:

- Enrolled in a class taught by the employee;
- Receiving academic advising or mentoring from the employee;
- Working for the employee; or
- Subject to any form of evaluation by the employee.

Other types of fraternization may also violate our policy. An employee must disclose and discuss with the employees supervisor any relationship with a student that could be perceived as inappropriate.

Family Educational Rights and Privacy Act (FERPA)

In accordance with the Family Educational Rights and Privacy Act (commonly referred to as FERPA) the University has adopted the following policies and procedures to protect the privacy rights of students.

Definitions: The University uses the following definitions in our policy.

Student: Any person who is enrolled or has attended the University.

Education records: Any record maintained by the University which is directly related to a student, with the following exceptions:

- 1. Personal records kept by University employees that are in the author's sole possession and are not accessible or revealed to any other person.
- 2. Employment records unless the employment records are contingent on the fact that the employee is a student (i.e., work-study students).
- 3. Records maintained by the safety and security office solely for law enforcement purposes.
- 4. Records maintained by the Health Center.
- 5. Alumni records.

Inspecting Education Records

A student may inspect and review his or her education records upon request to the appropriate record custodian. The student should submit in writing a request which identifies as precisely as possible the records he/she wishes to inspect. The custodian will make the necessary arrangements for access within 45 days after receipt of the written request and will notify the student of the time and place where the records may be inspected.

Right or the University to Refuse Access

The University reserves the right to refuse to permit a student to inspect the following records:

- 1. The financial statement(s) of the student's parents.
- 2. Letters and statements of recommendation for which the student has waived his or her right of access or which were placed in the file before Jan. 1, 1975.
- 3. Records connected with an application to attend the University if that application was denied.
- 4. Education records containing information about more than one student, in which case the University will permit access only to that part of the record which pertains to the inquiring student.
- 6. Those records which are excluded from the FERPA definition of education records.

Disclosure of Education Records

The University will disclose information from a student's education records only with the written consent of the student, except:

1. To school officials who have legitimate educational interest in the records.

A school official is:

- a person employed by the University in an administrative, supervisory, academic, research or support staff position;
- a person elected to the Board of Trustees;
- a person employed by or under contract to the University to perform a special task, such as legal counsel or an auditor.

A school official has legitimate educational interest if the official is:

- performing a task that is specific in his or her job description or by a contract agreement
- performing a task related to the student's education;
- performing a task related to the discipline of a student or
- providing a service or benefit relating to the student or the student's family, such as health care, counseling, job placement or financial aid.
- 1. To officials of another school, upon request, in which a student seeks to enroll.
- 2. To certain officials of the U.S. Department of Education, the comptroller general of the United States and state and local educational authorities, in connection with certain state or federally supported education programs.
- 3. In connection with a student's request for or receipt of financial aid, as needed to assess eligibility, amount or conditions of the financial aid or to enforce the terms and conditions of the aid.
- 4. If required by a state law requiring disclosure that was adopted before Nov. 19, 1974.
- 5. To organizations conducting authorized studies for, or on behalf of the University.
- 6. To accrediting organizations to carry out their functions.
- 7. To parents of an eligible student who claim the student as a dependent.
- 8. To appropriate parties in a health or safety emergency.

Records Retention

The University requires that certain records be retained tor specific periods of time. The University is responsible for and committed to effective records retention in order to preserve its history, ensure that critical records are available to meet business needs, comply with legal requirements, optimize the use of space, minimize the cost of record retention and ensure outdated and useless records are destroyed. Record retention periods may be increased by government regulation, judicial or administrative consent order, private or governmental contract, pending litigation or audit requirements.

- 1. Contact Your Immediate Supervisor // 2. Department Manager // 3. UP Compliance Officer
- 4. Call the 24/7 Integrity Hotline at 888-294-8455 // 5. www.integrityonline.ethicspoint.com

Working with Community, Vendors and Other Partners

We strive to transform conditions for a better tomorrow while serving the needs today.



FOR MORE INFORMATION, SEE THE BACK COVER.

Entertainment, Gifts, Favors and Gratuities

Accepting gifts, gratuities, favors, rewards and offers of entertainment creates a risk that our judgment and decisions can be influenced. In some cases, acceptance of gifts and entertainment may be considered a violation of federal and or state laws.

Employees may not solicit, accept or give any gift, gratuity, favor, entertainment, reward or any other item of monetary value unless it is of nominal value, is customary in the industry, will not violate any laws and will not influence or appear to influence me employee's or the recipient's judgment or conduct at me University.

Vendor Interactions

Interaction with vendors shall be conducted so as to avoid or minimize actual perceived or potential conflicts of interest. Business relationships with vendors can never be based on an implied or expressed understanding that acceptance of gifts or future favors will influence me conduct of University business. When actual, perceived or potential conflicts of interest do arise, they must be addressed in accordance with me University's Conflicts of Interest Policy

Vendor interactions include but are not limited to the following:

- 1. Gifts to individuals
- 2. Gifts to an entity
- 3. Offers of paid travel to individuals
- 4. Accepting meals
- 5. Vendor participation in events
- 6. Research grants
- 7. Consulting arrangements (including surveys)
- 8. Speakers and educational events
- 9. Purchasing and contracts

Conflicts of Interest

Employees may not partake in any activity or association that creates or appears to create a conflict between the employee's personal interests and me University's interests. In addition, an employee must not allow any situation or personal interest to interfere with the exercise of the employee's independent judgment or with the employees ability to act in me best interests of the University. If an employee has any question whether an action or association would violate this policy, the employee must contact the employee's supervisor or the University's compliance officer to obtain advice on the issue.

Outside Employment

An employee must disclose to his or her supervisor any outside employment and employee must get approval from his or her supervisor before obtaining employment with a competitor of the University. If there is question about whether the employer is a competitor, the employee should discuss with his or her supervisor.

Financial Interest in Other Business

Employees and their immediate family members may not invest in any of the University's suppliers or competitors unless the form of investment is publicly traded and the investment is on the same terms available to the general public and not based upon any inside information. This prohibition applies to all forms of investments.

Communications and Media Relations

No employee may act or speak for the University in response to media inquiries or in press releases, publications, speeches or other public declarations without specific authorization from the University.

- 1. Contact Your Immediate Supervisor // 2. Department Manager // 3. UP Compliance Officer
- 4. Call the 24/7 Integrity Hotline at 888-294-8455 // 5. www.integrityonline.ethicspoint.com

Style Guide/Brand Standards

The approved University brand covers all representations that identify the University, including its official titles, logo, trademarks, slogans, business names, seals, mascots and domain names. Use of this brand is protected, covered and must be approved by University administration. Creation of University 'other brands', regardless of whether the crest or other traditional University visual identifiers are incorporated, potentially detracts from the impact and recognition of the University's approved brand. All use of the brand must follow the guidelines set by the official University Style Guide/Brand Standards.

Branding that introduces a new visual identifier (for example, ϕ go, color or domain name) outside the specifications of the University Brand Standards is not allowed without approval by administration or University of Providence Marketing and Communications as appropriate.

Acceptable Use of Technology Resources

The use of University information technology resources is subject to the normal requirements of legal and ethical behavior within the University community. Responsible, acceptable use is ethical, reflects academic honesty, is consistent with the University of Providence Mission and values and those of the sponsoring organization Providence St. Joseph Health and shows community awareness in the consumption of shared resources. Occasional non-commercial personal use of the University's information technology resources is permitted.

When using the University of Providences' information technology resources, users must comply with all federal, Montana and other applicable laws: applicable University rules and policies, and all applicable contracts and licenses. Users must use information technology resources only for lawful purposes and not for any purpose that is illegal, immoral, unethical, dishonest, damaging to the reputation of the University, inconsistent with the Mission and values of the University or likely to subject the University to harm.

Examples include but are not limited to:

- · Violating the laws of defamation, privacy, copyright, trademark, obscenity and child pornography;
- Violating the Electronic Communications Privacy Act and the Computer Fraud and Abuse Act, which prohibit hacking, cracking, and similar activities;
- Violating published University policies governing student, faculty and staff conduct, including the use of the cyber environment in violation of the University's Sexual Harassment Policy; and
- Misuse of any applicable licenses.

Uses of information technology resources are not private. The normal operation and maintenance of the University's technology resources require backup and caching of data and communications, logging of activity, monitoring of general use patterns and other such activities that are necessary to provide security.

The University reserves the right to inspect any activities or accounts of individual users of University information technology resources, including individual login sessions and communications, without notice, unless otherwise prohibited by law. The University may inspect such information technology resources under circumstances When the University determines inspection is necessary, including but not limited to the following:

- To protect the integrity, security or functionality of University or other information technology resources or to protect the University from harm:
- There is reasonable cause to believe the user has violated or is violating, any University policy or applicable civil or criminal law; or
- An information technology resource appears to be engaged in unusual or unusually excessive activity, as indicated by monitoring of general activity and usage patterns.

Social Media

The University of Providence uses social media to communicate its Mission and culture through the sharing of relevant and timely content while engaging in conversations with key audiences, including prospective and current students, parents, alumni, friends and donors. The University recognizes that social media and other forms of electronic communication can be effective tools for doing ones job and supporting the University's interests. When communicating about the University or matters that affect the University, its students, faculty, staff and/or alumni, all employees are expected to follow this Code of Conduct and all University policies even when using social media outside of work or when using personal social media accounts in which employees indicate their affiliation with the University of Providence. New social media accounts representing any aspect of the University must be approved by administration or University of Providence Marketing and Communications as appropriate.

Intellectual Property

The University of Providence desires to create on intellectual environment whereby creative efforts and innovations ore encouraged; it still retains reasonable access to, and use of, intellectual property, in the creation of which the University has provided assistance. University personnel ore covered to the extent their intellectual property involves the use of University resources such as space, facilities, equipment, staff or funds, as stipulated for the particular circumstances.

- 1. Contact Your Immediate Supervisor // 2. Department Manager // 3. UP Compliance Officer
- 4. Call the 24/7 Integrity Hotline at 888-294-8455 // 5. www.integrityonline.ethicspoint.com

GLOSSARY OF TERMS

Compliance Acting in accordance with accepted standards and policies, including laws, rules and regulations.

Confidentiality A set of rules or a promise that limits access or places restrictions on certain types of information. Example:

medical information about a student or financial information about the University.

Conflict of Interest A situation in which someone in a position of trust has competing professional or personal interests. Such

competing interests can make it difficult to fulfill his or her duties impartially. Even if there is no evidence of improper actions, a conflict of interest can create an appearance of impropriety that can undermine confidence in the ability of that person to act properly in his or her position. Example: a purchasing

department employee ordering supplies from his brother's business.

Employee Anyone employed by the University.

Ethical Behavior Doing what is right; acting on the basis of University of Providence's Mission, and acting with integrity and

setting the highest standards for ourselves and for our ministry.

Fraud and Abuse Fraud is distinguished from abuse in that, in the case of fraudulent acts, there is clear evidence that the

acts were committed knowingly, willfully and intentionally or with reckless disregard.

Abuse is engaging in a practice or activity that is not part of generally accepted, sound industry standards

that may result in unnecessary costs or the receipt of an improper payment.

Integrity Honesty in words and actions.

RegulationsRules enacted by a government agency that must be followed by those organizations or businesses

providing the services covered by the rules.

Retaliation Any action that negatively affects a workforce member because he or she raised a concern or assisted in

the investigation of a concern.

Standards and Policies Requirements for expected behaviors or actions by the University of Providence employees.

University The University of Providence and any company wholly owned by it.

FOR MORE INFORMATION

UNIVERSITY OF PROVIDENCE

Human Resources Office hr.up@uprovidence.edu

UP Compliance Officer 406-791-5207 or compliance.up@uprovidence.edu

Website: www.uprovidence.edu

INTEGRITY HOTLINE: 888-294-8455 (toll free)

INTEGRITY ONLINE: www.integrityonline.ethicspoint.com

