

**UNIVERSITY OF HOUSTON SYSTEM
ADMINISTRATIVE MEMORANDUM**

SECTION: Human Resources

NUMBER: 02.A.09

AREA: General

SUBJECT: Conflict of Interest

1. PURPOSE

Although the University of Houston System depends upon the integrity and discretion of its staff with respect to actual or apparent conflict of interest, all University of Houston System employees are expected to obey all federal, state and local laws. This administrative memorandum presents requirements to avoid conflicts of interest in accordance with Texas Government Code [Section 572.051](#), Texas Education Code [Section 51.9337](#), and Board of Regents Policies, including [57.01](#), [57.02](#), [57.04](#), [57.05](#) and [57.08](#).

2. POLICY

2.1. Conflict of interest is the use of one's University of Houston System employment to obtain unauthorized privileges, benefits, or things of value for oneself or others.

2.2. Guidelines to avoid conflict of interest include the following:

- a. No employee shall solicit, accept, or agree to accept any privilege, benefit or thing of value for the exercise of their discretion, influence or powers as an employee except as is allowed by law.
- b. No employee shall accept any privilege, benefit or thing of value that might tend to influence them in the discharge of their duties as an employee.
- c. No employee shall use their position to secure special privileges or exemptions for themselves or others, except as is allowed by law.
- d. No employee may be an officer, agent, employee, or member of, or own an interest in a professional activity that foreseeably might require or induce them to disclose confidential information acquired by reason of their System position.
- e. No employee shall accept employment or engage in any business or professional activity which foreseeably might require or induce them to disclose confidential information acquired by reason of their University of

Houston System position.

- f. No employee shall disclose confidential information gained by reason of their university position, nor shall they otherwise use such information for their personal gain or benefit.
- g. No employee shall transact any business for the University of Houston System with any entity of which they are an officer, agent, employee, or member, or in which they have a direct or indirect financial or other interest.
- h. No employee shall make personal investments in any enterprise which foreseeably might create a substantial conflict between their private interests and the University of Houston System's interests.
- i. No employee shall accept other employment which might impair their independence or judgment in the performance of their University of Houston System duties.
- j. No employee shall receive any compensation for their services to the University of Houston System from any source other than the State of Texas except as is allowed by law.
- k. No employee who exercises discretion in connection with contracts, purchases, payments, claims or other pecuniary transactions shall solicit, accept or agree to accept any benefit from a person or entity the employee knows, or should know, is or is likely to become financially interested in such transactions.
- l. No employee shall ask the University to accept a gift, grant, donation, or other consideration to be used as a salary supplement without the prior written approval of the recipient's immediate superior, the office of the general counsel and the president, and written authorization of the internal auditor, who shall report the necessary information to the State Auditor.
- m. No employee shall knowingly solicit, accept, or agree to accept any benefit for having exercised the employee's official powers or performed the employee's official duties in favor of another.
- n. Each employee who is involved in procurement or in contract management shall disclose to the agency any potential conflict of interest specified by state law or University policy that is known by the employee with respect to any contract with a private vendor or bid for the purchase of goods or services from a private vendor with the University.
- o. No employee shall have a direct or indirect financial or other interest, shall engage in a business transaction or professional activity, or shall incur any

