

POLICY CONCERNING CONFLICT OF INTEREST AND ETHICS

PURPOSE

This policy is established to ensure that the Associated Students Inc. (ASI) operates with absolute integrity as a 501(c)(3) nonprofit public benefit corporation and an auxiliary of the California State University (CSU) system. It integrates the mandates of the Gloria Romero Open Meetings Act, the California Education and Corporations Codes, the Nonprofit Integrity Act of 2004, and CSU Executive Order 1059 to ensure that student leaders and staff maintain the highest ethical standards.

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WHO SHOULD KNOW THIS POLICY

- | | |
|---|--|
| <input checked="" type="checkbox"/> Budget Area Administrators | <input checked="" type="checkbox"/> Volunteers |
| <input checked="" type="checkbox"/> Management Personnel | <input type="checkbox"/> Grant Recipients |
| <input checked="" type="checkbox"/> Supervisors | <input checked="" type="checkbox"/> Staff |
| <input checked="" type="checkbox"/> Elected/Appointed Officials | <input type="checkbox"/> Students |

DEFINITIONS

For purpose of this policy, the terms used are defined as follows:

Terms	Definitions
Conflict of Interest	Participating in or making decisions where a person's private or economic interests could reasonably be affected in a material way or impacted differently than other persons with the same association to the organization.
Director	As defined in Corporations Code Section 5047, "director" means a person who is a member of the governing board of the corporation. It does not include persons who possess the title of director but do not have the right to vote on the governing board.
Employee	A person hired by ASI for a wage of fixed payment in exchange for personnel services who does not provide the services as part of an independent business.
Executive Officer	The President, Vice President, Secretary, or Treasurer of the corporation, or other individuals serving in like capacities who assist in establishing corporate policy.
Financial Interests	A direct or indirect material financial gain resulting from a contract or transaction.
Member	Collectively refers to all officers, directors, employees, and volunteers of ASI in the performance of their duties or when perceived as representing ASI.
Nonpublic Information	Any information received by reason of membership or employment is not a matter of public record.
Self-Dealing Transaction	A transaction to which the ASI is a party and in which one or more of its directors has a material financial interest.
Statement of Compliance	An annual signed affirmation that a member has read the policy, understands the legal provisions of the Education Code, and has disclosed all potential conflicts.

STANDARDS

1. STANDARD FOR THE BOARD OF DIRECTORS, EXECUTIVE OFFICERS, AND EMPLOYEES

The Board of Directors is the primary governing body of ASI and holds ultimate fiduciary responsibility for the organization. Executive Officers are responsible for implementing Board policy and managing day-to-day operations. They are subject to specific role-based restrictions and public disclosure mandates. ASI expects all employees to adhere to professional conduct guidelines that protect the safety, security, and interests of the organization and the university community.

a. Non-Conflict of Interest

In accordance with California Education Code, Sections 5230, 5233, 89906, 89907, 89908 and 89909, all ASI Board of Directors members and Executive Officers must submit a Certification of Non-Conflict of Interest Statement as outlined below:

I have read California Education Code Sections 5230, 5233, 89906, 89907, 89908 and 89909, and I am not involved financially, through employment or family connections, with any business, firm, vendor, and/or service bureau doing business with this corporation.

Should I find in some future contractual matter before the Board of Directors that there may be the potential of a conflict of interest, I shall disclose that potential conflict and abstain from voting, as prescribed in Education Code, Section 89907.

This Non-Conflict of Interest Statement shall be submitted at the time a member assumes their official duties. Statements shall be retained by the ASI Corporate Affairs department.

All Full-Time ASI Employees are required to submit a certification of non-conflict as outlined below:

This policy applies to all officers, directors, employees and volunteers of the ASI (collectively referred to herein as "members" or "member") who engage in any procurement activity involving funds of the Associated Students, CSUF, Inc. Members must avoid conflicts of interest. Business decisions must be made objectively on the basis of price, quality, service, and other competitive practices. To avoid any potential influence from existing or potential vendors and customers, members are prohibited from accepting gifts, of more than token value, from vendors, suppliers, and customers.

Members transacting business or entering into contracts on behalf of the ASI must not have any interest, financial or personal, in those transactions or contracts. Should a member have an interest in an organization with whom the ASI transacts business, the member must recuse him/herself from any negotiation, authorization, or approval of such transactions.

Members must not be employed outside the ASI where outside employment impairs their ability to conduct ASI business because of conflicts of interest and competing interests.

This Non-Conflict of Interest Statement shall be submitted at the time of employment and then again annually at the beginning of every fiscal year. Statements shall be retained by the ASI Human Resources department.

b. Ethics

Introduction

This code will serve as a minimum guide for ethical conduct and provide guidance and direction for all officers, directors, employees, and volunteers of ASI (collectively referred to herein as members or member) in the performance of their duties or in any context in which they are perceived as representing ASI.

Laws and Regulations

All members must comply with applicable laws and regulations governing the operation of ASI. This includes, but is not limited to, federal, state, county and municipal laws, the California Code of Regulations, the California Education Code, campus regulations of California State University Fullerton, and the Office of the Chancellor, California State University.

Conflict of Interest

Members must avoid conflicts of interest. Business decisions must be made objectively on the basis of price, quality, service and other competitive practices. To avoid any potential influence from existing or potential vendors and customers, members are prohibited from accepting gifts, from vendors, suppliers, and customers, of more than token value.

Members transacting business or entering into contracts on behalf of ASI must not have any interest, financial or personal, in those transactions or contracts. Should a member have an interest in an organization with who the ASI transacts business, the member must recuse themselves from any negotiation, authorization, or approval of such transactions.

Members must not be employed outside ASI where the outside employment impairs their ability to conduct ASI business because of conflicts of interests and competing interests.

Fair Dealing

Behind any code of ethics is the concept of fair dealing. As a guiding principle, members must respect and deal fairly with customers, suppliers, vendors, contractors, co-workers, and the general public. In the course of conducting ASI business, members must not take advantage of others by misrepresentation, concealment, misuse of confidential and privileged information, or any other practice of unfair dealing.

Members must not disclose a vendor's pricing or business activities to competitors. In the course of business, all members must refrain from any practice that could constitute unfair dealing. At all times, members must be accurate and truthful in all their dealings with vendors, suppliers, and customers and be careful to accurately represent the services and products of ASI.

2. COMPLIANCE AND DOCUMENTATION

a. Annual Certifications

All Board members and Executive Officers must submit the following signed statement upon assuming official duties and annually thereafter by July 1:

"I have read California Education Code Sections 5230, 5233, 89906, 89907, 89908 and 89909, and I am not involved financially, through employment or family connections, with any business, firm, vendor, and/or service bureau doing business with this corporation. Should I find in some future contractual matter before the Board of Directors that there may be the potential of a conflict of interest, I shall disclose that potential conflict and abstain from voting, as prescribed in Education Code, Section 89907."

All ASI Employees will receive a copy of this policy and indicate with their signature that they have read and understood the policy on an annual basis. The signed statement will be kept on file in the ASI Human Resources Office.

b. Record Retention

All signed Statement of Compliance forms, conflict-of-interest agreements, and ethics disclosures shall be retained in the ASI Student Government Office (for Board Members and Executive Officers) and ASI Human Resources (for ASI Employees) for a minimum of seven (7) years.

DATE APPROVED: 04/07/2026
DATE REVISED: