

# Juilliard

**Title:** Conflicts of Interest Policy

**Policy Owner:** Office of the General Counsel

**Contact Information:** Room 225 Main Building  
(212) 799-5000, ex. 231  
[OGC@juilliard.edu](mailto:OGC@juilliard.edu)

**Applies to:** All members of the Juilliard community, including faculty; staff; members of the Board of Trustees; employees; volunteers; students who are acting as employees or volunteering as part of a Juilliard sponsored program, activity, or event; interns; contractors; consultants; agents; and other persons and organizations acting on the School's behalf. This includes all affiliates and other entities formed by the School, and any joint ventures the School participates in, whether or not the School owns the majority interest.

**Effective Date:** March 1, 2018

At different times and in varying ways, members of the community are called upon to make decisions and to exercise judgment as they fulfill their responsibilities to Juilliard.

Each member of the community is required to exercise judgment and make decisions that are in the best interest of the School. They must avoid conflicts (or any appearance of conflict) between the interests of the School and their own interests or those of a family member.

Specifically, no member of the community may:

- Have a direct or indirect interest, financial or otherwise, of any nature that is in conflict with the proper discharge of the community member's duties.
- Disclose confidential information gained by reason of his or her official position, or otherwise use such information for his or her personal gain or benefit, or for the gain or benefit of a family member.
- Transact any business in his or her official capacity with any business entity of which the employee or a family member is an officer, agent or member, or in which the

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community member or a family member owns an interest (other than insubstantial interests in publicly-traded companies).

- Undertake positions with other organizations that involve a conflict of interest *vis a vis* Juilliard.

Members of the community must disclose any existing or potential conflict of interest as soon as possible after they realize that it has arisen or may arise. The fact that an individual has a potential conflict does not necessarily mean that it is an unethical or impermissible conflict, but it must always be disclosed and satisfactorily resolved. It is possible, for example, that a vendor owned by a party related to a Juilliard community member provides a unique or lowest-cost service to the member's department. That may ultimately be deemed to be in Juilliard's best interest, but the community member should never allow it to occur or continue without proper disclosure and approval by a supervisor or other disinterested party.

Trustees, senior management, and certain other department heads are required to complete a Conflict of Interest Questionnaire annually and make disclosures to the Secretary of the Board of Trustees or to the Audit Committee. All other community members should make disclosures to their supervisor or to the General Counsel.