

Charter of the Emory University Office of Ethics and Compliance

MISSION STATEMENT:

The Emory University Office of Ethics and Compliance is committed to promoting the highest legal, professional, and ethical standards. We will collaborate with all members of the Emory University community to foster a collective effort to comply with the laws, regulations, policies, and ethical principles that govern Emory University.

PURPOSE:

The designation of an independent compliance office that reports to the highest levels of an organization's administration is the foundation of an effective compliance and ethics program. The Office of Ethics and Compliance was established to fulfill this important role; however, the most successful compliance programs acknowledge and rely on a collective effort from all members of the University community.

The Office of Ethics and Compliance's role is to coordinate the efforts of all individuals and units through the administration of the Ethics and Compliance Council; in-depth assessment and monitoring of compliance and ethics risks; assistance with policy and procedure development; conduct of comprehensive compliance-related training and education; maintenance of effective lines of communication and reporting, including, but not limited to, administering the anonymous reporting hotline; support of operational compliance owners with managing compliance requirements and self-monitoring; promotion of the consistent enforcement of disciplinary standards; and prompt attention to detected non-compliance or other compliance deficiencies.

INDEPENDENCE:

It is vital that the Office of Ethics and Compliance operates independently to fulfill its mission. To provide for this independence, the Office of Ethics and Compliance reports directly to the Chair of the Audit and Compliance Committee of the Board of Trustees and the Executive Vice President for Business and Administration.

AUTHORITY:

In order to meet its responsibilities and maintain independence, the Office of Ethics and Compliance is authorized to have access to university records, documents, facilities, and personnel necessary to conduct compliance assessments, training, audits, monitoring and investigations, and fulfill reporting requirements. The University's administration will ensure that units and personnel cooperate with the Office of Ethics and Compliance in carrying out its compliance activities. Reports generated from the Office of Ethics and Compliance's assessments, audits, monitoring, and investigations will be provided to appropriate university leadership and/or legal counsel. When specific findings or issues of non-compliance, unmitigated compliance risks, or other deficiencies are identified, the administrative personnel with authority over the activities reviewed shall be responsible for developing and implementing necessary corrective action plans. Corrective action plans may be submitted to the Office of Ethics and Compliance for review and input. Although the Office of Ethics and Compliance shall conduct assessments, audits, monitoring and investigations, responsibility for compliance shall remain with the school/unit reviewed, not the Office of Ethics and Compliance.

COORDINATION WITH OTHER ENTITIES:

The Office of Ethics and Compliance coordinates with various community entities including but not limited to, Emory University Internal Audit, the Emory Healthcare Office of Compliance, the Emory University Office of the General Counsel, Emory University Human Resources, the Office of Research Compliance and Regulatory Affairs, the Office of the Provost, the Emory Police Department, Emory Investment Management, Advancement and Alumni Engagement, the Office of Information Technology, the Environmental Health and Safety Office, Enterprise Risk Management, the Office of Diversity, Equity and Inclusion, Campus Services, and Campus Life, through membership of all of these units on the Ethics and Compliance Council (ECC). The ECC meets regularly to discuss emerging compliance issues, coordinate efforts, and collaborate on compliance initiatives. At each meeting, the Office of Ethics and Compliance will provide the Council with compliance-related updates, including data and trends related to reports made to the Trust Line.

ACCOUNTABILITY, RESPONSIBILITY AND SERVICES:

The Office of Ethics and Compliance is accountable to the Audit and Compliance Committee of the Board of Trustees and to Senior Leadership for implementing and maintaining an effective compliance and ethics program. This involves overseeing and serving as a resource for school and units' operational compliance with the laws, regulations and policies that apply to Emory as an institution of higher education. The Office of Ethics and Compliance fulfills this responsibility by performing the following services:

- Overseeing and providing assistance with the compliance risk assessment process and prioritizing risks.
- Assessing program compliance with governing statutes, regulations, and policies.
- Providing assistance to the program owners when regulatory agencies review University compliance.
- Developing an annual compliance plan in accordance with the Department of Justice guidance and federal sentencing guidelines.
- Providing input on policy and process development to promote compliance.
- Collaborating with program owners to provide input on action plans, to remedy compliance gaps.
- Triaging and following-up on reports via the Trust Line and other reporting methods in accordance with applicable University policies.
- Reporting findings to the Ethics and Compliance Council, the Audit and Compliance Committee of the Board of Trustees and to programs, schools, and units, as needed.
- Providing training and educational opportunities to the Emory community on compliance issues and ethical decision-making.
- Collaborating with other Emory offices that address institutional compliance risks, including Internal Audit, Enterprise Risk Management, the Office of the General Counsel, the Office of Research Administration, and the Emory Healthcare Compliance Office to mitigate and respond to institutional risks.
- Serving as the privacy office for the University and collaborating with other Emory offices that address privacy and data security risks, including the Office of General Counsel, the Chief Information Security Officer, and the Emory Healthcare Office of Compliance to develop strategies maintaining confidentiality and integrity of confidential and/or sensitive information and to mitigate those risks and respond appropriately to privacy and security incidents.

INTEGRITY AND CONFIDENTIALITY:

The Office of Ethics and Compliance operates with the highest level of integrity and respect for the confidentiality of the information to which it may have access.

Approved by the Audit and Compliance Committee of the Board of Trustees September 19, 2022