

Title: Conflicts of Interest Policy

Policy Owner: Office of the Legal Counsel

Contact Information: Office of the Legal Counsel
The Tianjin Juilliard School
3699 Xinhua Road Binhai New Area
Tianjin 300452

Applies to: All members of the Tianjin Juilliard School (“Tianjin Juilliard” or “School”) community, including faculty; staff; members of the Board; employees; volunteers; students who are acting as employees or volunteering as part of a School 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: September 1, 2020

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

- Have a direct or indirect interest, financial or otherwise, of any nature that is in conflict with the proper discharge of the School 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 School community member or a family member is an officer, agent or member, or in which the School 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* Tianjin Juilliard.

Members of the School 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 Tianjin Juilliard community member provides a unique or lowest-cost service to the School member's department. That may ultimately be deemed to be in Tianjin Juilliard's best interest, but the School community member should never allow it to occur or continue without proper disclosure and approval by a supervisor or other disinterested party.

Board members, 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 the School. All other School community members should make disclosures to their supervisor or to the Legal Counsel.