

Title: 文件名 :	Conflicts of Interest Policy 利益冲突政策
Policy Owner: 政策所有者 :	Office of the Legal Counsel 法务总监办公室
Contact Information:	Room 2B09 022-25764890, ext. 8851 Sammy.Zhang@tianjinjuilliard.edu.cn
联系方式 :	2B09室 022-25764890, 分机. 8851 Sammy.Zhang@tianjinjuilliard.edu.cn
Applies to:	All members of The Tianjin Juilliard School (“Tianjin Juilliard” or “School”) community, including: faculty; staff; board members; employees; volunteers; students who are acting as employees or volunteering as part of a Tianjin 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.
适用于 :	天津茱莉亚学院全体成员（以下称“天津茱莉亚”或“学院”），包括：教师、行政人员、理事会成员、其他雇员、志愿者、天津茱莉亚赞助项目、活动雇员或志愿者、实习生、承包商、顾问、中介及其他代表学院执行工作个人或组织。无论学院是否拥有其中绝大多数权益，上述组织皆包括学院设立的所有附属机构及其他实体、学院参与的任何合办项目。
Effective Date: 生效日期 :	September 17, 2020 2020年9月17日

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. 学院成员将在不同时间、以不同方式被要求做出决定并进行判断，以履行对天津茱莉亚的责任。

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.

学院各成员皆被要求在最符合学院利益前提下进行判断并做出决定，同时必须避免学院利益及个人利益或个人家人利益间出现冲突（或任何可能出现冲突的端倪）。

Specifically, no member of the School community may:

具体而言，学院成员不得：

- 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.
在履行作为学院成员职责时，与学院发生直接或间接、金钱或其他类型冲突。
- 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.
泄露因其职权而获得的机密信息，或以其他方式将该信息用于获取个人利益，或用于为家庭成员获取利益。
- 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).
利用职权与由学院成员或其家庭成员担任管理人员、作为代理或成员，或具有利益关系（与上市公司的非实质性利益除外）的经济实体进行任何交易；
- Undertake positions with other organizations that involve a conflict of interest *vis a vis* Tianjin Juilliard.
在与天津茱莉亚存在利益冲突的其他组织任职。

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.

在发现任何已有或潜在的利益冲突已经或可能发生时，学院成员应立即进行披露。事实上，个人存在潜在冲突并不意味着该冲突必然不符合商业道德或不被允许的，但应始终予以披露并圆满解

决。例如，与天津茱莉亚某成员有关的某供应商向该学院成员所在部门提供独特或成本最低的服务是可能被允许的。这最终可能被认定为符合天津茱莉亚的最大利益，但除非该学院成员向其主管或其他无利害关系方进行了适当披露和并被批准，否则，学院成员须坚决杜绝该等情况发生或持续存在。

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.

理事会成员、高级管理人员和某些其他部门负责人须每年填写利益冲突调查问卷，并向学院理事会秘书进行披露。学院其他所有成员应向其主管或法律顾问进行披露。