

Title: Conflicts of Interest Policy
文件名: 利益冲突政策

Policy Owner: Office of Legal Counsel
政策所有者: 法务总监办公室

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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、员工、理事会成员、其他雇员、志愿者；以雇员或志愿者身份参与天津茱莉亚赞助项目、活动、事件的学生；实习生；承包商；顾问；代理和其他代表学院行事的个人或组织。该政策同时适用于学院设立的所有关联机构和其他实体，以及由及学院参股的任何合资项目，，无论学院是否在该合资项目中是否具有控股权。

Effective Date: March 8, 2024
生效日期: 2024年3月8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.

学院各成员都应行使其判断力并做出符合学院最佳利益的决策。同时必须避免学院利益与其个人利益或其家庭成员利益间出现冲突（或出现任何可能产生利益冲突的情况）。

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.

泄露因其公职而获得的机密信息，或以其他方式将该信息用于获取个人利益，或用于为其家庭成员获取利益。

- 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).

- 利用公职与学院成员或其家庭成员担任管理人员、代理人或成员的任何商业实体进行交易，或与学院成员或其家庭成员享有权益（享有上市公司的非重大利益除外）的任何商业实体进行交易。 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.

学院成员在意识到已经或将可能出现任何已有或潜在利益冲突时须立即披露。个体存在潜在冲突时并不必然意味着该冲突为不道德或是不被允许，但该冲突须始终予以披露并得到满意的解决。例如，与天津茱莉亚成员有利益关系供应商也有可能向该成员的部门提供独特的或成本最低的服务。这最终可能会被视为符合天津茱莉亚的最大利益，但是，除非学院成员进行了适当披露并得到了其主管或其他无利害关系方的批准，否则学院不应允许这种情况发生或持续进行。

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长进行披露。学院其他所有成员应向其主管或法务总监进行该等披露。