



**DONALD DANFORTH PLANT SCIENCE CENTER**

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APPLIES TO: All DDPSA STAFF

**TITLE: POLICY ON ETHICAL CONDUCT**

**1. Preamble**

The Donald Danforth Plant Science Center (the “Danforth Center” or the “Center”) aspires to be one of the premier plant research institutes in the world, attracting scholars from around the globe to conduct research at the frontiers of the plant sciences and to learn the latest developments in this field. In order to help achieve this aim, the Center has adopted this Policy on Ethical Conduct, which seeks to promote the following fundamental and complementary goals:

- To establish and maintain the highest standards of ethical conduct among all those at the Danforth Center;
- To foster an environment that is conducive to the disinterested pursuit of the advancement of scientific knowledge;
- To promote an atmosphere of trust and confidence among management, administrative staff, and all those conducting research at the Danforth Center, whether employed by the Center or visiting from other institutions;
- To maintain public confidence in the professional judgment of management, administrative staff, and all those performing research at the Danforth Center as being free from improper influence;
- To train the next generation of scientists in an environment that fosters the development of responsible and ethical conduct.

This policy applies to the following members of the Danforth Center community:

- individuals who are paid by the Center, including faculty and staff;
- consultants, vendors and contractors that do business with the Center;
- students and visiting scientists who engage in research or other scholarly activities at/with the Center;
- individuals who perform services for the Center as volunteers;
- the Board of Trustees.

This policy refers to all these individuals collectively as "members of the Danforth Center community" or "community members."

## **II. Ethical Requirements**

- 2.1 Members of the Danforth Center community must observe high standards of business and personal ethics, honesty, integrity and good judgment in the conduct of their duties and responsibilities. They must be accountable for their actions and demonstrate respect for the rights of others. Each person must observe and maintain high standards of ethical conduct in relationships with other researchers, scholars, scientists, administrators, and entities with which the Center has arrangements for funding, sponsored or collaborative research, licensing, or otherwise.
- 2.2 All members of the Danforth Center community must comply with all federal, state and local laws of the United States and other countries when not in conflict with U.S. law applicable to the activities of the Center. Any action taken by a community member should be fully in accord with all applicable laws and principles of ethical conduct.
- 2.3 No member of the Danforth Center community shall knowingly participate in any plan, transaction or arrangement involving unlawful or unethical conduct by others.
- 2.4 No member of the Danforth Center community shall disclose confidential or proprietary information related to the Danforth Center without appropriate agreements governing the exchange.
- 2.5 No resources of the Danforth Center (including photocopy machines, telephones, computers, stationery, office supplies, postage, employee time, etc.) may be used for lobbying, political campaigns, or soliciting political contributions. The Center encourages all community members to engage in normal political activities outside of their duties at the Danforth Center, however, no community member may use his or her official position or capacity at the Center to endorse or oppose any political group, candidate, issue or legislation. Furthermore, no community member may solicit employees, having a direct or indirect reporting relationship to the community member, to contribute to, support or oppose any political group, candidate, issue or legislation.
- 2.6 No resources of the Danforth Center (including photocopy machines, telephones, computers, stationery, office supplies, postage, employee time, etc.) may be used by any community member for personal use in an abusive or excessive manner.

## **III. Reporting Responsibility**

- 3.1 It is the responsibility of all members of the Danforth Center community to report (a) questionable or improper accounting or auditing matters, and (b) violations of and suspected violations of the Policy on Ethical Conduct (hereinafter collectively referred to as "Concerns").
- 3.2 Upon hire, and annually thereafter, each community member shall be required to complete the Policy on Ethical Conduct signature form affirming receipt of the policy, understanding of its content and agreement to comply with the policy.

## **IV. Compliance Officer**

- 4.1 The Compliance Officer is responsible for assuring proper investigation and resolution for all reported Concerns regarding violations or suspected violations of the Policy on Ethical Conduct. **The Danforth Center’s Compliance Officer is the Vice President of Human Resources, who will submit all recommendations to the Audit Committee Chair of the Board of Trustees for review and approval.**

## **V. Reporting Violations**

- 5.1 Community members who suspect that the Policy on Ethical Conduct has been violated should share Concerns with an individual who can address them properly. In most cases, an employee’s supervisor is in the best position to address a Concern. If an employee is not comfortable speaking with a supervisor or is not satisfied with a supervisor’s response, he/she may speak with someone in Human Resources or may choose to file an anonymous report.
- 5.2 Members of management (i.e., those in a supervisory capacity) are required to report their Concerns to the Compliance Officer, who has responsibility to investigate all reported Concerns and shall report findings and corrective actions to the Audit Committee Chair.
- 5.3 Employees are always encouraged to utilize the open door policy of their supervisor or Human Resources to report Concerns. However, to ensure that anyone affiliated with the Danforth Center has the ability to report Concerns confidentially and anonymously, a 24/7 hotline (1-800-318-4014) has been established through the Employee Assistance Program with Magellan Health Services, Inc. Reported Concerns are funneled back anonymously to the Compliance Officer for resolution. Personal identification of the source of the Concern will not be provided.
- 5.4 Trustees and other volunteers should submit their Concerns in writing directly to the Audit Committee Chair. Contact information for the Audit Committee Chair may be obtained from the office of the Vice President of Finance.

## **VI. Accounting and Auditing Matters**

- 6.1 The Audit Committee of the Board of Trustees will address all reported Concerns related to accounting and auditing matters. The Compliance Officer will immediately notify the Audit Committee Chair the V.P. of Finance and the President of any such Concerns. All Concerns will be investigated and appropriate action recommended for approval by the Audit Committee.

## **VII. Suspected Violation of the Research Integrity Policy**

- 7.1 Concerns of violations or suspected violations related to the conduct of research will be reported to the Research Integrity Officer (RIO) and may require specific actions as outlined in the Danforth Center Research Integrity Policy.

## **VIII. Handling of Reported Violations**

- 8.1 The following process will be followed to determine a course of action for all reported Concerns that do not allege research misconduct. The course of action will depend upon

the Center's assessment of the nature and seriousness of the alleged violation, and the extent to which the violation has compromised the integrity of the Center.

- 8.2 The Compliance Officer will notify the complainant and acknowledge receipt of the reported Concern within three (3) business days. If a complaint is made anonymously, no attempt will be made to identify or communicate with the complainant. The Audit Committee Chair, the President and the Chief Operating Officer (COO) will also be notified of all Concerns.
- 8.3 All Concerns, except those outlined in Section #7.1 above, will be promptly investigated and a recommended course of action will be developed by the Compliance Officer, the President and COO. Consultation and advice from outside legal counsel, accountants, private investigators, or other resources may be obtained as deemed necessary to conduct a complete and full investigation of the Concern. After the investigation is completed, the course of action will be recommended to the Audit Committee Chair for review and approval.
- 8.4 As appropriate, the Audit Committee Chair will consult with the Chairman of the Board of Trustees and the full Audit Committee.
- 8.5 The Compliance Officer has responsibility for implementing and monitoring compliance with the approved course of action, which must include a conclusion and/or follow-up with the complainant for complete closure of the Concern. If the complaint was made anonymously, follow-up with the complainant will not be required.
- 8.6 The Compliance Officer is required to report to the Audit Committee at least annually on all compliance activity.
- 8.7 Recommended courses of action for violations concerning officers or trustees will be reported to the Board of Trustees.

## **IX. Acting in Good Faith**

- 9.1 Any good faith report, concern or complaint is fully protected by this policy, even if the report, question or concern is, after investigation, not substantiated. Anyone who files a complaint concerning a suspected violation of the Policy on Ethical Conduct must have reasonable grounds for believing the information disclosed is true and correct. Making allegations maliciously or with knowledge that they are false is a serious offense subject to disciplinary action.

## **X. Confidentiality**

- 10.1 Reports of violations or suspected violations will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation. All members of the Danforth community who are involved in an investigation must maintain confidentiality regarding the complaint and all individuals involved in the investigation.
- 10.2 The Danforth Center will use its best efforts to protect the confidentiality of the complainant for any good faith report. Complaints may be submitted on a confidential basis or anonymously (refer to Section #5.3).

10.3 The Danforth Center will use its best efforts to protect the confidentiality of those accused of violations as well as any witnesses involved.

**XI. No Retaliation**

11.1 No member of the Danforth Center community who in good faith reports a Concern will suffer harassment, retaliation or adverse employment consequences. An employee who retaliates against someone who has reported a Concern in good faith is subject to discipline up to and including termination of employment.

ORIGINAL ISSUE DATE: March 1, 2011

EFFECTIVE DATE OF REVISION:

AUTHORIZED BY: *Salvatore J. Fiorello*  
Chief Operating Officer and Sr. Vice President

**SIGNATURE PAGE**

By signing below, I acknowledge that I have read and understand the attached policy and will comply with its requirements.

Please sign and return this page to Deborah Barron, Human Resources, 975 North Warson Road, St. Louis, MO 63132.

\_\_\_\_\_  
Employee Signature

Date: \_\_\_\_\_

\_\_\_\_\_  
Salvatore J. Fiorello, Chief Operating Officer

Date: \_\_\_\_\_