



Compliance and Ethics Program

I. Message from the President.

Rochester Institute of Technology shapes the future and improves the world through creativity and innovation. As an engaged, intellectually curious, and socially conscious community, we leverage the power of technology, the arts, and design for the greater good. At the heart of this vision and mission is a commitment to excellence that extends to all aspects of our educational and research programs.

In pursuit of excellence, the expectation is that all members of the RIT community will conduct their work in the highest ethical manner and comply with the law and policies that govern activities and operations of the university. In that spirit, the [Code of Ethical Conduct and Compliance](#), along with university's [Core Values](#), [Honor Code](#), [Diversity Statement](#), and [Commitment to Environmental Sustainability](#), provides a framework for acceptable standards of behavior. These policies also reinforce the principle that all members of the RIT community, including university officials and the Board of Trustees, have a responsibility to ensure that RIT conducts its business and pursues its mission ethically, legally, and with integrity.

Cultivating a community where compliance and ethics are valuable and supported requires that we work collaboratively across the university and recognize that compliance with laws, regulations, and policies is a university goal requiring broad management and administration. Ensuring compliance with laws, regulations, and RIT policy is the responsibility of every member of the RIT Community, but none of us can complete this task alone.

It is important to know that there are university resources available to help you identify areas with compliance and legal responsibilities. The Office of Compliance and Ethics is available to assist you to develop, implement, and monitor compliant and ethical practices in your area, and identify parties outside of your department who should be engaged as collaborative partners.

Together, the RIT Community can work toward the vision of a sustainable culture committed to the highest standards of ethics, transparency, accountability, and respect.

II. Purpose.

RIT seeks to operate in accordance with the highest level of business and community ethics and in compliance with all applicable laws, regulations, and policies. RIT is committed to preventing, detecting, and correcting any conduct that is inconsistent with these principals, and achieving the vision of a sustainable culture committed to the highest standards of ethics, transparency, accountability and respect.

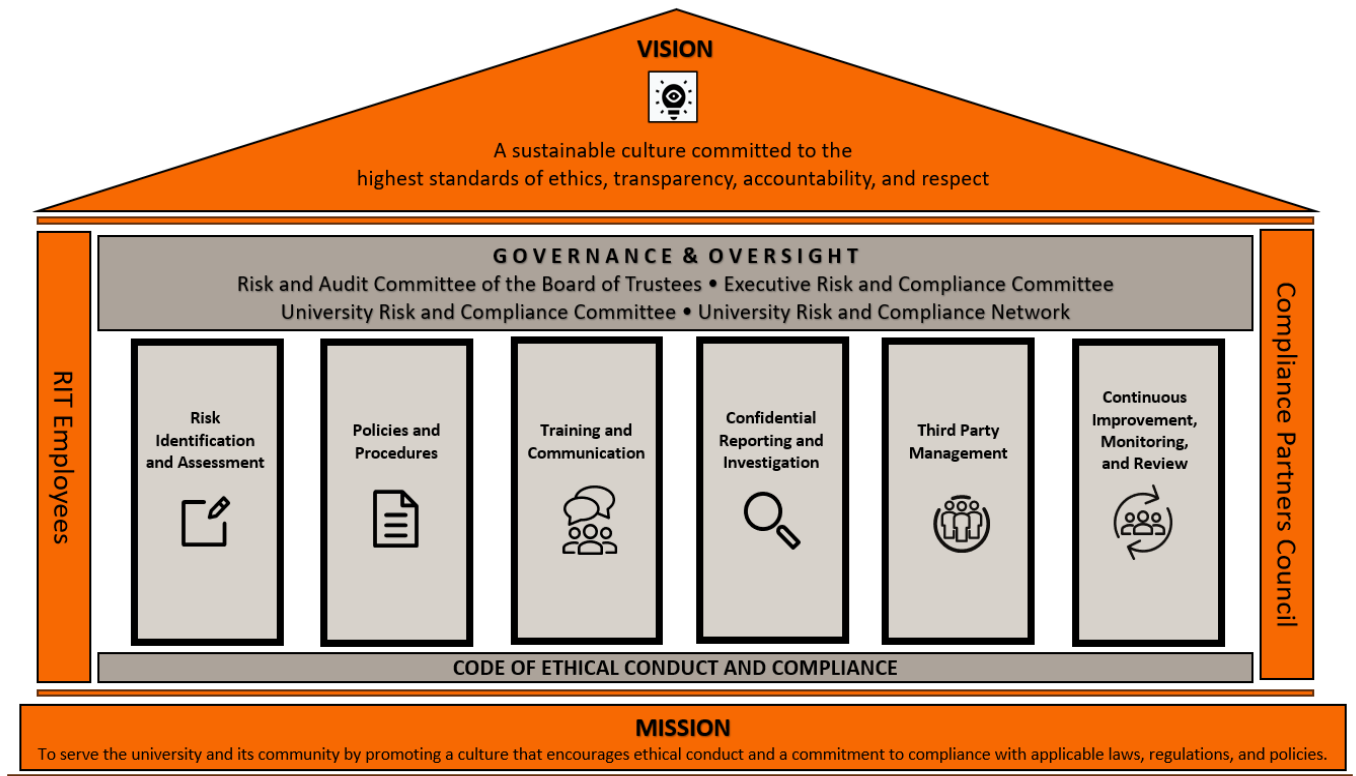
The RIT Compliance and Ethics Program (“the Program”) supports the compliance goals and objectives of the university and drives OCE’s mission: To serve the university and its community by promoting a culture that encourages ethical conduct and a commitment to compliance with applicable laws, regulations, and policies.

III. Scope.

The Program applies to all members of the RIT community. The success of the Program relies heavily on the commitment and collaboration of RIT’s Board of Trustees (“Board”), the Risk and Compliance Committees, and all RIT employees. All members of the RIT Community must abide by the university’s policies and the requirements of the Program.

IV. Elements of the Compliance and Ethics Program.

RIT’s Program is influenced by the principles of the U.S. Federal Sentencing Guidelines section on an Effective Compliance and Ethics Program and the Department of Justice Evaluation of Corporate Compliance Programs.¹ The foundation of the Program is the [Compliance Policy and Code of Ethical Conduct \(C00.0\)](#) (the “Code”). The Code embodies the expectations for the RIT Community that its members will act ethically and in compliance with applicable laws and policies in all activities on behalf of the university while representing RIT, utilizing RIT resources, on RIT property, and/or attending RIT functions. The Program incorporates critical processes, individuals to oversee, identify, assess, and manage RIT’s risks, and resources as needed.



¹ U.S. Federal Sentencing Guidelines Manual §8B2.1 (2016). See also U.S. Department of Justice [Evaluation of Corporate Compliance Programs](#) (March 2023).

A. Critical Resources and Processes.

Many processes contribute to an effective compliance and ethics program. Those listed below serve as constant pillars for the RIT Program.

1. Risk Identification and Assessment.

RIT conducts an enterprise-wide risk assessment, which includes a review of all legal and compliance risks. The university conducts assessments on a multi-year process cycle, with comprehensive risk assessment surveys completed once every three (3) years and brief surveys inquiring about changes to risks between full assessment years. Both comprehensive and brief surveys identify, analyze, and prioritize risks through quantifiable impact and likelihood scales, with top enterprise risks requiring documented risk response plans to ensure proper management. The other risks identified through this process serve as a blueprint for operational areas to address pressing needs and assist OCE in identifying compliance areas that require additional oversight. This risk assessment process includes input from a wide variety of individuals on campus, from subject matter experts who undertake the university's day-to-day activities, operational management, and senior management, to the Board of Trustees.

2. Policies and Procedures.

In addition to the [Compliance Policy and Code of Ethical Conduct \(C00.0\)](#), which sets forth the ethical and compliance expectations for the RIT Community, additional policies and procedures specify the requirements developed by the university to address statutory and regulatory requirements. When creating key policies and procedures, the engagement of various stakeholders is key to ensure the standards from policies and procedures are both applicable and implementable at the university. RIT maintains a [University Policies Manual](#) online to ensure university policies and procedures are always easily accessible.

3. Training and Communication.

Education and training play a key role in clarifying expectations and responsibilities, while minimizing legal, financial, and physical risks for both employees and the university. RIT is committed to providing training to its employees to equip them to do their jobs, with a special focus on providing training and resources to employees in control functions and high-risk areas. RIT provides training in multiple formats to support varying accessibility needs. Communication by senior leadership reaffirms to the entire RIT community the university's commitment to compliance and ethics. OCE oversees the university's Policy on [Mandatory Training \(C.25\)](#).

4. Confidential Reporting and Investigation.

RIT provides multiple avenues for individuals to [report](#) misconduct and noncompliance confidentially and without retaliation. Among other reporting options, the [Ethics and Compliance Hotline](#) is an anonymous option, available both online and by phone, to the RIT community. The appropriate internal department reviews all allegations, and qualified investigators conduct impartial investigations, as appropriate. Issues related to fraud, corruption, sexual misconduct, and allegations made by protected classes of individuals receive special attention, with reports elevated to senior leadership as appropriate. Corrective action, up to and including termination, may result upon findings of responsibility.

5. Third Party Management.

RIT consistently monitors and manages interactions with external parties with which the university has a working relationship to ensure ethical and compliant business practices. Third-party management at RIT includes oversight of research partners and sponsors under the umbrella of RIT's Research Compliance program, vendor and supplier vetting, and Information Security policies and standards that guide RIT business associates and other third parties in meeting RIT's standards of lifecycle protection when handling RIT information or supporting RIT information systems and supporting infrastructure. In addition, OCE monitors actual, potential, and perceived conflicts of interest and commitment for all staff and faculty, ensuring management plans are in place as needed to address third-party relationships.

6. Continuous Improvement, Monitoring, and Review.

RIT monitors high-risk activities and continuously reviews processes and procedures within the Compliance and Ethics program. OCE works closely with Internal Audit, Compliance and Advisement ("IACA") to ensure detailed reviews of high-risk areas. Additionally, annually updating the risk assessments allows the Program to continuously evolve based on current risks.

B. Critical Individuals Providing Governance and Oversight to the Program.

The Compliance and Ethics Program requires the coordination of individuals and committees with varying levels of authority and different areas of expertise within the university. The university has a robust governing and accountability structure to ensure effective oversight of the Program.

An effective compliance program requires the commitment of senior leadership and management to ensure effective internal controls and adherence to high ethical standards. The Program reflects a strong commitment by the President, the Board, and senior and operational leadership to comply with all applicable laws and regulations to operate the university in a manner consistent with the highest levels of integrity and ethical conduct. The following parties

share the governance responsibility of ensuring effective implementation of the Compliance and Ethics Program at RIT, proportionate with their roles, functions and areas of control.

1. Board of Trustees: Risk and Audit Committee.

The **Board of Trustees** retains the ultimate responsibility for legal and regulatory compliance and determining the appropriate level of compliance risk the Board is willing to accept in RIT's business activities. The Board, together with senior leadership, sets the "tone at the top" for the entire university.

The Board delegates oversight of legal and regulatory compliance activities to the **Risk and Audit Committee of the Board of Trustees**. The Risk and Audit Committee reviews significant Program activities and may provide timely reports on the Program to the full Board of Trustees as appropriate.

2. The Risk and Compliance Committees.

In addition to the Board, the university has three internal risk and compliance committees. This structure allows for more comprehensive oversight of regulations and requirements by administrators and operational managers than a single compliance officer could provide alone. This structure also facilitates the sharing of best practices and recent developments with compliance contacts across the university and provides a forum for raising awareness on risk and compliance activities around the university.

The risk and compliance committees provide guidance and support for the operation of the Program and support the Associate Vice President of Compliance and Ethics in the implementation of the Program.

➤ **Executive Risk and Compliance Committee**

The **Executive Risk and Compliance Committee** ("ERCC") assists the Risk and Audit Committee of the Board of Trustees and the Associate Vice President of Compliance and Ethics in fulfilling their compliance and ethics responsibilities. The Senior Vice President of Finance and Administration and the Provost co-chair the ERCC. With the Board of Trustees, the ERCC sets the "tone at the top" and monitors key risk and compliance areas.

➤ **University Risk and Compliance Committee**

The **University Risk and Compliance Committee** ("URCC") is comprised of other administrators and operational managers who have responsibilities in the major compliance areas of the university. These include, among other areas, employment, student affairs, academic affairs, research, enrollment management, financial aid, development and alumni relations, diversity and inclusions, and finance. The Associate Vice President for Global Risk Management Services and the Associate Vice President of Compliance and Ethics co-chair the URCC. The URCC is responsible for overseeing, evaluating, and validating the risk and compliance issues identified by the University

Risk and Compliance Network. Operational managers for areas under which a risk falls are also responsible for managing the identified risks.

➤ **University Risk and Compliance Network**

The **University Risk and Compliance Network** (“URCN”) is a group of individuals identified by members of the URCC and are responsible for the day-to-day functional compliance activities attendant to their designated compliance areas. They also serve as subject matter experts on key operational and strategic risk and compliance areas. The URCN works with the Associate Vice President of Compliance and Ethics to revise and update the risk register as applicable to their compliance areas. The URCN coordinates and collaborates with OCE on compliance initiatives and new compliance obligations. Various members may meet with OCE periodically on the status of compliance initiatives in their compliance areas.

3. Additional Parties Critical to the Success of the Program.

In addition to the basic structure framework of the Program, other parties play vital roles in RIT’s commitment to creating a culture of compliance and ethics. Many of these individuals are members of the various internal compliance committees, and others step in to assist in various aspects of the Program when appropriate.

➤ **Office of Compliance and Ethics**

OCE is responsible for the development and oversight of the Program. The **Associate Vice President of OCE** is primarily responsible for the development, implementation, monitoring, communication, and enforcement of the Compliance and Ethics Program. OCE provides Program reports to the Risk and Audit Committee and other internal committees.

The Associate Vice President of OCE manages the internal risk and compliance committees, co-chairs the URCC, oversees monitoring and the URCN risk assessments, oversees and assists in internal investigations, and participates in compliance risk remediation activities where appropriate. The Associate Vice President of OCE is also responsible for creating and continuously improving Program-related policies and procedures and recommending necessary changes to internal controls.

➤ **Compliance Advisers and Partners**

OCE may seek the advice or counsel of specialists at RIT, and if needed, outside RIT, who have specialized knowledge or expertise in relation to a risk area. For example, in addition to **IACA**, RIT’s **Office of Legal Affairs** (“OLA”), **Office of Global Risk Management Services** (“GRMS”), and other disciplines may function as compliance advisors to OCE on laws, other business requirements, or for further consultation in a specific field of knowledge.

The **Compliance Partners Council** (“Council”) is a subgroup of employees, comprised of key compliance partners within the university who have departmental-level compliance programs or whose primary role serves a compliance function within the university. The purpose of the Council is to provide a forum to share best practices and ideas relating to compliance and ethics issues, concerns, or challenges, and encourage continuous improvement of, and fostering adherence to, the university’s commitment to compliant and ethical policies, procedures, and practices at all levels.

➤ **Operational Managers**

Operational Managers are responsible for ensuring compliance with all compliance requirements and obligations associated with the activities of their position, including identifying, reporting, and managing any compliance breaches. Operational managers are responsible for regularly reporting to senior leadership and, where appropriate, OCE the status of controls, compliance breaches, any plans for corrective action, and any proposed or enacted improvements.

As new laws and regulations emerge, operational managers are responsible for identifying new and changing risks within their area. Operational managers are also responsible for thoroughly reviewing the compliance risk profile of their divisions or units at least once a year as part of business planning and budgeting exercise; this review should consider the completeness of the risks identified, the accuracy of control assessments, and the verification of the effective operation of identified controls. RIT expects operational managers to inform and consult with OCE where appropriate.

➤ **All RIT Employees**

The most crucial factor to ensure the success of the Program is the commitment and attitude of all employees. Under the Code, all members of the RIT Community must “conduct themselves ethically, with integrity and in compliance with applicable laws and regulations.” Employees must also be responsible to undertake their duties in accordance with university established policies, procedures, and guidelines.

All **RIT employees** are responsible for ensuring their own compliance with all regulatory, legislative, and internal policies and procedures associated with the activities of their position including identification, management, and reporting of any compliance breaches.

In addition, all employees are responsible for attending scheduled compliance training, and reporting and escalating any compliance concerns, issues, or failures in accordance with the policy.

Responsible Office:	Office of Compliance and Ethics
Approved by:	Risk and Audit Committee of the Board of Trustees
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