MARSHALL UNIVERSITY
Research Corporation

Marshall University Research Corporation
Interim Code of Conduct for HUD-Assisted Activities

Scope

This interim code of conduct applies to the Marshall University Research Corporation's (MURC) HUD-assisted work and related procurement. This document supplements existing MURC policies, takes effect upon signing, and will remain in effect until superseded by compliant standards.

Conflicts of Interest

MURC employees, officers, board members, and agents, including Marshall University personnel acting for MURC, must not participate in selecting, awarding, or administering a HUD-supported contract when a real or apparent conflict of interest exists. Such a conflict exists when that individual, an immediate family member, their partner, or an organization employing or about to employ any of them has a financial or other interest in, or receives or would receive a tangible personal benefit from, an entity being considered for or awarded the contract. Anyone covered by this provision must promptly disclose potential conflicts in writing to the Executive Director or another authorized, unconflicted official and refrain from the affected activity pending review. Disclosure or internal approval does not authorize participation prohibited by federal requirements.

MURC must identify and prevent organizational conflicts that impair or appear to impair its impartiality in procurement or other HUD-assisted activities, including conflicts arising from relationships with a parent, affiliate, subsidiary, or other related organization. MURC and its subrecipients must comply with applicable HUD conflict-of-interest requirements, including 24 CFR 578.95 for Continuum of Care activities, its CoC-board recusal requirements, and its restrictions on covered persons' financial interests and benefits during service and for one year afterward. MURC will disclose potential conflicts to HUD in writing as required and obtain HUD's written approval before proceeding with any exception requiring that approval.

Gifts

Employees, officers, board members, or agents, including Marshall University personnel acting on behalf of MURC will neither solicit nor accept gratuities, favors, or anything of monetary value from contractors, potential contractors, or parties to sub-agreements. Depending upon the circumstances, exceptions to this provision may be granted only in situations where the financial interest is not substantial or the gift is an unsolicited item of nominal intrinsic value.

Employees, officers, board members, or agents, including Marshall University personnel acting on behalf of MURC shall be careful to ensure that s/he is involved in no apparent or potential violations of this provision.

Administration

Any employee, officer, board member, or agent, including Marshall University personnel acting on behalf of MURC should report violations of this Code of Conduct to his/her supervisor, or to the Vice President for Research/Executive Director.

There will be no retaliation against any party who makes a good faith complaint concerning violations of this Code of Conduct, regardless of whether it is ultimately determined that such violation has in fact occurred. Nor will there be any

retaliation against any party who provides information in the course of an investigation into alleged violations of this Code of Conduct.

All MURC supervisors have a responsibility to be sensitive to and deal with violations of this Code of Conduct. This responsibility includes monitoring all relevant work activities and contacting a higher-level supervisor or the Vice President for Research/Executive Director, if it is reasonably believed that a violation of the Code of Conduct has occurred. Any such report shall be investigated regardless of whether a formal complaint has been made.

Discipline

Any employee, officer, board member, or agent, including Marshall University personnel acting on behalf of MURC determined to have committed a violation of this Code of Conduct shall be subject to disciplinary action, up to and including termination.

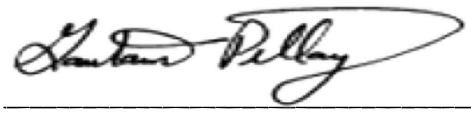
Dissemination

Any employee, officer, board member, or agent, including Marshall University personnel acting on behalf of MURC shall be informed of this Code of Conduct when this Code is adopted, and/or when s/he is initially retained by MURC.

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Authorization

This Interim Code of Conduct for HUD-Assisted Activities takes effect on the date of signing, November 2, 2026.



Gautam Pillay, PhD
Vice President for Research, Marshall University
Executive Director, Marshall University Research Corporation