

## **Weber Human Services Consulting Policy**

### **PURPOSE:**

It is anticipated that Weber Human Services (WHS) Colleagues (as defined below) may be asked to provide professional services to outside entities or individuals, give talks or lectures, or participate in other such activities for which they would be paid compensation, including honoraria. It is the policy of WHS that Colleagues may provide Consulting Services and may accept compensation for providing Consulting Services under certain circumstances.

### **DEFINITIONS:**

“Colleagues” means all WHS employees and temporary, per diem staff, volunteers, students and others rendering paid or unpaid services to WHS, including, but not limited to, Agents and Board Members.

“Company” means any corporation, business, entity, organization that WHS may do business with, may have influence over WHS, or in any other way whose purpose or function may impact WHS.

“Consulting Services” means professional services, including Expert Witness Services, or giving talks and lectures for outside entities or individuals for which compensation, including honoraria, is received.

“Expert Witness Services” means the retention of a Colleague, based on his or her area of expertise, by an outside individual or entity to review documentation, conduct research, render an opinion, whether in writing or not, and, in some cases, provide testimony as to that opinion on a matter not in any way related to WHS.

### **GENERAL REQUIREMENTS AND PROHIBITED ACTIVITIES:**

- Colleagues may participate in lectures, conferences, or similar programs provided that they retain responsibility for the content of any related papers or talks that they write or give, including slide content.
- Compensation paid to a Colleague for Consulting Services must be fair market value for the services provided by the Colleague and must be documented in a written agreement.
- Compensation paid to a Colleague for Consulting Services may include payment for meals, food, and beverages in accordance with the WHS Travel Policy. Entertainment or recreational items of any value (e.g., golf balls, sports bags, artwork, CD’s, tickets to a sporting event) are “Personal Gifts” (as defined in the “Gifts” Policy) and are prohibited.

## **COLLEAGUES MAY NOT:**

- Participate in a company program for which the company (1) has a contractual right to control what the Colleague says, (2) creates the presentation materials and has a right of final approval of all content, or (3) controls the publicity related to the event;
- Participate in industry-sponsored speakers bureaus or other programs for which the Colleague receives compensation to act as the company's spokesperson to disseminate company-generated materials or promote company products, except for programs at which the Colleague would present the results of his or her industry sponsored study to peers and there is an opportunity for critical exchange;
- Publish articles or editorials that contain substantial portions written by someone who is not identified as an author or who is not properly acknowledged when the articles or editorials are written on behalf of WHS or use the WHS name;
- Accept payment for attending industry-sponsored meetings or accept "Personal Gifts" (as defined by the "Gifts" Policy) from industry at these meetings;
- Accept compensation for listening to a sales pitch by an industry representative; or
- Accept travel funds from a company or industry representative, except for travel funds that are legitimate reimbursement for Consulting Services and are in accordance with the WHS Travel Policy.

## **GENERAL PROCEDURE:**

- Before agreeing to perform the Consulting Services, the Colleague shall disclose his or her intention to provide such services by disclosing the potential conflict of interest in accordance with the Conflict of Interest Policy. The Colleague's disclosure shall include a description of the Consulting Services, the dates of service, the estimated number of hours, the expected compensation, and any travel or other expenses that would be reimbursed.
- Upon approval of the request in accordance with the Conflict of Interest Policy, the Colleague may then perform the Consulting Services. The Colleague shall the final written agreement for Consulting Services to the Corporate Compliance Committee.
- Except as set forth below, Consulting Services should be provided outside the hours that the Colleague is expected to perform duties on behalf of WHS (for example, during vacation, weekends, or evenings) and no WHS time, expenses, or resources (including, but not limited to, staff, information technology, or the WHS name or logo) may be used. The Colleague may retain the compensation received for providing Consulting Services.
- When giving talks or lectures for which an honorarium will be received, the Colleague may provide the Consulting Services during regularly scheduled WHS hours or use WHS resources (including, but not limited to, financial, staff, information technology, or the WHS name or logo). Any honorarium received for Consulting Services provided during regularly scheduled WHS hours or with the use of WHS resources shall be endorsed to WHS.

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Approved: 8/15/14

Reviewed:

Revised:

- When providing Consulting Services, the Colleague may not in any way represent that his or her opinion is the opinion of WHS.