

NIMALAN CHINNIAM

*Vice-President for Administration and CFO*

January 2009

### BUSINESS CONDUCT AT THE UNIVERSITY OF CHICAGO

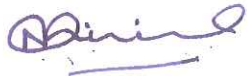
The University of Chicago is one of the preeminent educational and research institutions in the world. The University has been able to achieve and sustain its status through individual and collective commitments to excellence. As part of these commitments, employees are obligated to protect the University's finances, assets and resources; comply with applicable law and University policies; and treat those with whom they have business dealings with respect, honesty and civility. In all internal and external business dealings, University of Chicago employees are committed to these principles:

1. *Conducting themselves ethically, honestly, and with integrity*
2. *Carrying out the responsibilities entrusted to them*
3. *Respecting others*
4. *Learning and abiding by applicable laws, regulations, contractual obligations, environmental health and safety policies, and professional standards and codes*
5. *Complying with University policies, procedures and other guidance*
6. *Avoiding real or perceived conflicts of interest or commitment*
7. *Keeping confidential all private University information and records*
8. *Ensuring that all accounting and financial records including expense reimbursements, time and attendance records and reports to governmental agencies are timely, complete and accurate*
9. *Using University resources for legitimate University business*
10. *Reporting possible violations of this statement of business conduct, University policies and the law to the appropriate person with the assurance that University policy prohibits retaliation against anyone who does so in good faith*

The principles listed above reflect the spirit of the University's employee, financial, administrative and other policies, including those found at <http://adminet.uchicago.edu/index.shtml>, but do not change or replace them. If a specific law, regulation, or policy does not govern a University activity, the conduct of University employees must be governed by the principles of honesty, fairness, and respect for others. Practices incompatible with the above principles will not be tolerated even though they might be "customary" elsewhere; expediency should never compromise integrity.

Employees are expected to notify the University of inappropriate actions so that they can be properly addressed. Members of the University community should report concerns about compliance with laws, rules, regulations, and University policies or misappropriation of University assets, accounting irregularities or fraud through normal lines of communication including discussions with supervisors or advisors. If necessary, concerns may be reported to the University's hotline at 800.971.4317. A guide to reporting issues can be found at <https://adminet.uchicago.edu/adminpols/pols-pyramid/pyramid-index.shtml>

Sincerely,

A handwritten signature in blue ink, appearing to read "Nim Chinniah", with a horizontal line underneath.

Nim Chinniah  
Vice President for Administration and CFO