THE CITADEL
The Military College of South Carolina
171 Moultrie Street
Charleston, SC 29409

MEMORANDUM
NUMBER 11-154

16 November 2026

EMPLOYEE BUSINESS ASSOCIATIONS AND ANNUAL DISCLOSURE POLICY

1. PURPOSE

This policy establishes The Citadel's requirements for the annual disclosure of employee business associations in accordance with Section 59-101-700 of the South Carolina Code of Laws and other applicable requirements. This disclosure process is separate from any approval required for faculty outside employment or dual employment under Annex E of the Pay Plan Policy.

2. REFERENCE

S.C. Code of Laws, Ann. §59-101-700

Memo No. 11-116 Pay Plan Policy

3. DEFINITIONS

Business Association - Any business, trade, profession, employment, consulting arrangement, ownership interest, appointment, elected position, compensated membership, or other commercial activity conducted for compensation by an employee outside the employee's official duties with The Citadel.

Employee – Any full time or temporary employee of The Citadel. This policy does not apply to student employees.

4. POLICY

A. Conflict of Interest Requirements
Annual disclosure of a business association does not constitute approval of outside employment, dual employment, or any other compensated activity. Employees must separately obtain any approval required under Annex E of the Pay Plan Policy and comply with applicable conflict-of-interest, confidentiality, ethics, and College-resource requirements.

B. Employees may not structure a consulting arrangement, ownership interest, or other business relationship for the purpose of avoiding applicable disclosure or approval requirements.

C. Annual Disclosure of Business Associations

Each employee must annually disclose all business associations as defined in this policy through The Citadel's designated secure electronic reporting system. Employees must report any compensated business associations by December 15th of each calendar year.

The disclosure must include:

1) The name of each business with which the employee is associated;
2) The nature of the association, including employment, consulting, ownership, appointment, elected position, compensated membership, or other compensated activity; and
3) A general description of the work, services, or activities performed.
4) Employees must submit the required disclosure by the December 15th deadline established by The Citadel.

5. COMPLIANCE

A. Business Disclosure must be submitted here: Outside Business Activity Disclosure

B. Failure to adhere to this policy may result in disciplinary measures, up to and including termination.

6. NOTES

A. Dates of official enactment and amendments

Approved by the Vice President of Human Resources on 16 November 2026

B. Responsible Department

Human Resources

C. Responsible Official

Vice President of Human Resources

D. Cross References

Memo No. 11-116 Pay Plan Policy, Annex E

7. RESCISSION

N/A

FOR THE PRESIDENT:
OFFICIAL

LEAH SCHONFELD, MPA, SPHR
Vice President and Chief
Human Resources Officer
Colonel, UMSC