

NEW YORK UNIVERSITY

COMPLIANCE AND RISK STEERING COMMITTEE CHARTER

- **Steering Committee (“Steering Committee”) Mission Statement:** New York University provides a supportive environment for scholars and students to create new knowledge and to engage in teaching, research, learning and the provision of health care. Integrity in our work and compliance with applicable laws and regulations is critical to our academic enterprise and operations. It is also essential to the success of the University that we understand and effectively manage risk to align with the University’s strategy and protect its reputation and sustain its mission. The primary locus of compliance with applicable laws and regulations and identification and management of risks is in the academic and administrative units throughout the University, where the authority for policy development and the responsibility for implementation of compliance reside. The mission of the Steering Committee is to promote excellence in all our compliance and risk management enterprise efforts to assure integrity and compliance with our legal, regulatory, and ethical responsibilities and the prioritization and management of risk.
- **Steering Committee Composition:** The members of the Steering Committee are the President, Provost, the Executive Vice President, the Senior Vice President and General Counsel, the Deputy General Counsel, the Senior Vice President for Finance and Budget, the Vice Provost for Research, and the Senior Vice President for Capital Projects and Facilities. The President and Provost may appoint a designee. The University’s Vice President and Chief Global Compliance Officer (“VP, Chief Compliance Officer”) and the Associate Vice President Internal Audit, Enterprise Risk Management and Financial Compliance Officer (“AVP IA&ERM”) serve as staff to the Steering Committee. Other persons may be invited to attend meetings at which items relevant to their areas of responsibility or concern are raised.
- **Steering Committee Specific Responsibilities:** The Steering Committee is supported by the University’s VP, Chief Compliance Officer (the University Compliance Officers Working Group support the Compliance Office) and the AVP IA&ERM. The Steering Committee serves as a forum to communicate and advise on relevant risk and compliance matters. The Steering Committee also advises regarding compliance and risk issues to be presented to the Audit and Compliance Committee of the Board of Trustees. The Steering Committee will meet at least quarterly with the VP, Chief Compliance Officer and AVP IA&ERM to:
 - a. Review [and approve] the institutional risks that are presented to the Audit and Compliance Committee of the Board of Trustees;
 - b. Ensure key compliance and enterprise risk management strategies align with the risk appetite of the University;
 - c. Review the University’s risk and compliance environment and the substantive risk management and compliance initiatives for which the University’s academic and administrative units are responsible;

- d. Review the priorities presented by the Office of Compliance and Risk and ERM of the major units involved in compliance and enterprise risk management programs and receive reports of risks specific to the schools and units that may require attention of the Committee;
- e. Receive reports by the VP, Chief Compliance Officer on the activities of the University's compliance officers and their Working Group, including the School Liaisons to the Working Group;
- f. Review corrective plans to mitigate significant risks;
- g. Receive reports of alleged compliance violations, including reports to the University's Compliance Line, and any related investigations by internal and external parties;
- h. Review proposed legislative changes that impact higher education; and
- i. Discuss enforcement actions in higher education and emerging risks.

Note: Amended November 19, 2019.