

# Supplier Ethics Policy

Boston College is committed to the highest standards of product quality and business integrity in their dealings with customers and suppliers. As a result, all suppliers and the BC employees who work with them are expected to conduct themselves with the highest standards of honesty, fairness and personal integrity. It is critical to BC that suppliers and employees alike maintain high ethical standards, adhere to all applicable laws, and avoid even the perception of impropriety or conflict of interest.

## Introduction

This policy applies globally to all BC suppliers. "Supplier" here means any business, company, corporation, person or other entity that sells, or seeks to sell, any kind of goods or services to BC, including the supplier's employees, agents and other representatives. Questions concerning this policy with the subject line "Ethics" may be emailed to the BC Procurement Services Office at [purchase@bc.edu](mailto:purchase@bc.edu).

## We Acknowledge and Abide By This Policy

As a BC Supplier, we are expected to acknowledge this policy and to apply it in all dealings with, and on behalf of, BC. We understand that our failure to sign and return the Ethics Certification Form (as part of BC's Supplier qualification package) may result in our disqualification from consideration for business, and/or future business, with, BC.

## We Follow the Law

As a BC supplier, we will comply with all laws, regulations and policies applicable to us and our dealings with BC, including all applicable government contractual requirements, which flow down to us through our contracts with BC. This includes, but is not limited to, applicable US Small Business rules and regulations, Affirmative Action and Equal Employment Opportunity rules and regulations, and the rules regarding suspension and debarment of companies from doing business with the US Government and other similar laws and regulations applicable in other jurisdictions.

## We Understand BC's Policies Related to Kickbacks, Gifts, Gratuities, and Entertainment

As a BC Supplier, we will not offer, promise or provide any BC employee a kickback, favor, cash, gratuity, entertainment or anything of value to obtain favorable treatment from BC. BC employees are similarly prohibited from soliciting such favors from us. The prohibition extends to the offering, promising or giving of any favors to any family members of both our and BC's employees or with any other persons with whom we have or BC employees have significant personal relationships in exchange for obtaining or retaining BC's business.

As long as a gift is not intended to obtain favorable treatment from us, and does not create the appearance of a bribe, kickback, payoff or irregular type of payment, or otherwise raise any potential conflicts of interest. BC employees may accept a gift from a Supplier as long as all the following elements exist:

- The gift is \$100 or less in value for tangible gifts or \$200 for intangible gifts (such as event tickets etc.)
- Public disclosure should not embarrass BC
- Acceptance is consistent with BC business practices, and;
- Acceptance of the gift does not violate any applicable law

Furthermore, BC employees are prohibited from accepting initial public offering (IPO) stock from us, as a Supplier.

## We Avoid Conflicts of Interest

As a BC Supplier, we will not enter into a financial or any other relationship with a BC employee that creates any actual or potential conflict of interest for BC. We understand that a conflict of interest arises when the material personal interests of the BC employee are inconsistent with the responsibilities of his/her position with the company. All such conflicts must be disclosed and corrected. Even the appearance of a conflict of interest can be damaging to BC and to us, as the Supplier, and are to be disclosed and approved in advance by BC management.

## We Avoid Unfair Business Policies

As a BC Supplier, we will supply products that conform in all respects with the requirement of our contracts with BC including, in particular, all applicable quality requirements.

As a BC Supplier, we understand our obligation to maintain the highest standards of integrity in all business interactions. Any and all forms of corruption, such as bribery, extortion or embezzlement, are strictly prohibited.

## We Avoid Unauthorized Lobbying on Boston College's behalf

As a BC Supplier, we are not authorized to undertake any type of lobbying or other similar representative efforts on BC's behalf before any kind of government entity, official or body or representative without the express consent of BC's Government Affairs Group and written agreement.

## We Speak Up About Ethical Concerns

As a BC Supplier; we will promptly notify the BC Ethics Office regarding any known or suspected improper behavior by us relating to our dealings with BC, or any known or suspected behavior by BC employees or agents.

## By Telephone

617-552-3194

## By Email

[Audit@bc.edu](mailto:Audit@bc.edu)

## Anonymously

If you prefer to remain anonymous, you can mail a letter to the Audit Committee at:  
Boston College Audit Director  
St. Clements Hall 004  
140 Commonwealth Ave.  
Chestnut Hill, MA 02467