Effective Date: **September 1, 2012** Revised: **September 1, 2012**

POLICY

ETHICS, FINANCE AND ADMINISTRATION

Supplier Code of Ethical Conduct

RESPONSIBLE OFFICE

Procure to Pay

Policy Statement

As an institution dedicated to the search for truth through teaching, scholarship, and research, Boston University is committed to excellence and integrity in all its endeavors. In this way, Boston University will maintain the trust and confidence of both the University community and the public. The University's reputation is one of its most valuable assets. Persons or entities that do business with Boston University (hereinafter "a Supplier" or "Suppliers") are expected to carry out their business with the University with diligence and professionalism and to comply with the highest standards of honesty, integrity, and fairness. This includes, but is not limited to, being respectful of the rights of others and forthright in all dealings with members of the University community as well as third parties; protecting the privacy of confidential information; and compliance with all applicable laws, rules, and regulations.

Purpose

The University has upheld and will continue to uphold the highest levels of ethics and integrity in all its affairs. To this end, this Supplier Code of Ethical Conduct serves to emphasize the

University’s commitment to ethical conduct and compliance with the law and to set forth basic standards of ethical and legal behavior. Given the variety and complexity of ethical questions that may arise in the course of carrying out business with the University, this Code can serve only as a general guide. Confronted with ethically ambiguous situations, a Supplier should keep in mind the University’s commitment to the highest ethical standards and seek advice from appropriate sources so as to ensure that this commitment is honored at all times.

Ethical Standards

1. **Conflicts of Interest**

Trustees, officers, and employees of Boston University serve the public trust and are required to fulfill their responsibilities with care and loyalty and for the sole purpose of advancing the University’s best interests. The integrity of Boston University must be protected at all times, and the fiduciary relationship of trustees, officers, or employees to Boston University must be honored in both actuality and appearance. A conflict of interest exists when a representative’s direct or indirect personal interests are inconsistent with or interfere with the best interests of the University. To avoid such conflicts, Suppliers shall disclose to the University (i) any direct or indirect personal interests in a Supplier held by any trustee, officer, or employee of the University; and (ii) any family relationship between a trustee, officer, or employee of the University and any director, officer, or employee of Supplier.

2. **Fair Dealing**

Suppliers are required to act honestly, in good faith, and with professionalism. No Supplier may take unfair advantage of another person through harassment, manipulation, abuse of privileged information, misrepresentation of material facts, or any other unfair practice. Stealing proprietary information, possessing trade secret information that was obtained without the owner’s consent, or wrongfully inducing such disclosures by past or present employees of the University or any other organization is prohibited.

3. **Employment Standards**

Suppliers will maintain fair and non-discriminatory work environments where all employees are treated with respect and dignity and in a manner that comports not only with workplace practices mandated by state and federal laws, but also with Boston University’s commitment to

the highest ethical standards in all aspects of its educational mission and business practices, including employment.

4. **Confidentiality**

Suppliers must maintain the confidentiality of confidential information entrusted to them, except when disclosure is authorized by an appropriate officer of the University or required by law. Confidential information includes all non-public information that might be of use to competitors or other third parties or harmful to the University or its constituencies if disclosed; it also includes information that third parties have entrusted to the University. The obligation to preserve confidential information continues even after a Supplier's business relationship with the University ends.

5. **Protection and Proper Use of University Assets**

Suppliers should protect the University's assets and ensure their proper and efficient use. Theft, carelessness, and waste have a direct impact on the University's operations. Any suspected incident of fraud or theft should be immediately reported for investigation. The obligation of Suppliers to protect the University's assets includes, but is not limited to, its proprietary information. Proprietary information includes intellectual property such as patents, trademarks, and copyrights, as well as business plans, databases, records, employment information, and any unpublished financial data and reports. Unauthorized use or distribution of this information violates University policy and may also be illegal and result in criminal and/or civil liability.

6. **Compliance with Laws, Rules, and Regulations**

Obeying the law, both in letter and in spirit, is the foundation on which the University's ethical standards are built. In conducting business with the University, Suppliers must comply with applicable laws, rules, and regulations at all levels of government in the United States and in any other jurisdiction in which Supplier does business.

7. **Timely and Truthful Reporting**

Suppliers involved in the preparation of financial, sales, or payment reports and documents

(and information included therein) submitted to Boston University and/or filed with federal, state, and local authorities in connection with a Supplier's relationship with the University are required to make disclosures that are full, fair, accurate, timely, and understandable. They may not knowingly conceal or falsify information, misrepresent material facts, or omit material facts necessary to avoid misleading the authorities or the University. The same standards apply to other public communications made by the Supplier which reference Boston University.

END OF POLICY TEXT

Additional Resources Regarding This Policy

Related Policies and Procedures

- Conflict of Interest Policy
- Code of Ethical Conduct
- Employee Handbook - Section 402 Conflict of Interest Policy
- Research Conflict of Interest Policies
  - Investigator Financial Conflicts of Interest Policy for Research
  - Institutional Conflicts of Interest in Research Policy
  - Researcher Financial Conflicts of Interest (CRC IRB) Policy
  - IRB Member and Consultant Conflict of Interest Policy

BU Websites and Information

- BU's Conflicts of Interest Processes
- Where to Report a Concern
  - BU's Ethics and Compliance Hotline (Anonymous Reporting Hotline hosted by EthicsPoint)
  - Compliance Services Office
  - Office of the Ombuds
- Compliance Services Office

Categories: Ethics, Finance and Administration, Supplier, Supplier