



UNIVERSITY of  
DENVER

**UNIVERSITY OF DENVER  
POLICY MANUAL  
SUPPLIER CODE OF CONDUCT**

**Responsible Department:** Shared Services  
**Recommended By:** Provost, VC Business  
and Financial Affairs  
**Approved By:** Chancellor

**Policy Number**  
2.30.016

**Effective Date**  
6/8/2018

**I. INTRODUCTION**

This Policy sets forth standards under which all Suppliers are expected to conduct their activities in order to be considered for opportunities to do business with the University.

**II. POLICY OVERVIEW**

As a condition of doing business with the University, Suppliers are expected to self-monitor their compliance with this Code of Conduct. Failure to comply with this Policy may cause the University to exercise its right to terminate its business relationship with a Supplier. The University may require non-compliant Suppliers to implement a corrective action plan. Suppliers are responsible for ensuring that their employees and representatives understand and comply with this Policy. It is the Supplier’s duty under this Code of Conduct to inform Shared Services management of any violations of these requirements.

There is not an affirmative obligation on the part of employees and managers to police this Policy. Apparent exceptions to this Policy, when or if they become known from whatever source, should be evaluated by the procuring department and its determination regarding continuing, modifying or terminating the business relationship with the Supplier should be discussed with Shared Services, Vice Chancellor for Business & Finance and or Office of General Counsel. The evaluation and ultimate recommendation should be based on the potential financial and reputational impact to the University as well as materiality of the facts and circumstances.

### III. PROCESS OVERVIEW

ITEM DESCRIPTION	COMMENTS
<p><b>1. Compliance with Applicable Laws and Regulations</b></p>	<p>Suppliers are expected to conduct their business activities in full compliance with all applicable laws and regulations, including but not limited to all environmental laws and regulations, and all laws, regulations and internationally adopted restrictions concerning fair trade practices and compliance with applicable laws pertaining to bribery, fraud, kickbacks and corruption. This would also include the provisions of the Foreign Corrupt Practices Act and the applicable provisions of the UK's Bribery Act. Where there are differences or conflicts with this Code of Conduct and the applicable laws of a country, the higher standard will prevail. Whenever there is uncertainty as to which standard is higher, the University will consult with the Supplier to determine which standard will prevail. In addition, all Suppliers conducting business with the University must abide by all economic sanctions and/or trade embargoes that the United States has adopted, whether they apply to foreign countries, political organizations or particular foreign individuals and entities.</p>
<p><b>2. Health and Safety</b></p>	<p>Suppliers must ensure a safe and healthy work environment for their employees. Further, all Suppliers are required to operate in full accordance with applicable provisions of the Occupational Health and Safety Practices Act (OSHA).</p>
<p><b>3. Child and Forced Labor</b></p>	<p>Suppliers must ensure a safe and healthy work environment for their employees. Further, all Suppliers are required to operate in full accordance with applicable provisions of OSHA, as well as applicable international laws. Where there are differences or conflicts with this Code of Conduct and the applicable laws of a country, the higher standard will prevail. Whenever there is uncertainty as to which standard is higher, the University will consult with the Supplier to determine which standard will prevail.</p>
<p><b>4. Wages and Benefits</b></p>	<p>The University believes it is important to pay a living wage for work performed. Suppliers must comply with all applicable laws relating to wages and benefits, and must pay at minimum the legally prescribed minimum/prevaling wage that is in effect for the region performing the services (or manufacturing the products that the University is ordering).</p>

ITEM DESCRIPTION	COMMENTS
5. Harassment or Abuse	Suppliers must respect the rights and dignity of their employees. Human rights abuses, including physical, sexual, psychological or verbal harassment or abuse of workers, will not be tolerated.
6. Discrimination	Individuals must be employed, retained and compensated based on their ability to perform their jobs. It is a violation of this Policy to discriminate in the provisions of employment opportunities, benefits or privileges, to create discriminatory work or academic conditions, or to use discriminatory evaluative standards in employment or educational settings if the basis of that discriminatory treatment is, in whole or in part, the person's race, color, national origin, age, religion, disability, sex, sexual orientation, gender identity, gender expression, genetic information, marital status, or veteran status.
7. Freedom of Association	Suppliers must respect the rights of their workers to choose (or choose not) to freely associate and to bargain collectively where such rights are recognized by law.
8. Sustainability	<p>The University's committed to fiscal, social, and environmental responsibility.</p> <p>Preference shall be given to any product that has a lesser impact on human health and the environment when determined to have equal quality and price compared to traditional products. If the Environmentally Preferable Product exceeds such a desired level expense, and the unit has funding available within the current year's resources, a Life Cycle Cost Analysis may be performed to justify the margin.</p> <p>For additional information, <i>see</i> the Sustainability Policy at: <a href="http://www.du.edu/purchasing/documents/Sustainability%20policy.pdf">http://www.du.edu/purchasing/documents/Sustainability%20policy.pdf</a>.</p>
9. Subcontractors	Suppliers must ensure that all subcontractors and any other third parties they use in the production or distribution of goods or services offered for sale to the University comply with the principles described in this Policy.

ITEM DESCRIPTION	COMMENTS
<p><b>10. Conflicts of Interest</b></p>	<p>Conflicts of interest between a Supplier and a University employee, or the appearance thereof, should be avoided.</p> <p>Suppliers may participate in the development or drafting of specifications, requirements, request for quotes, or request for proposals provided the ultimate selection of the Supplier of goods or services complies with the University's Competitive Bidding Guidelines at <a href="http://www.du.edu/purchasing/policy/3_A.html">http://www.du.edu/purchasing/policy/3_A.html</a></p> <p>Employees, officers, and agents of the University shall neither solicit nor accept cash under any circumstance, or gratuities, favors, or gifts from Suppliers or potential Suppliers, except as provided in Policy 2.30.014 <i>Gifts and Gratuities Policy</i>.</p> <p>Unless specific written exception has been obtained from the Vice Chancellor for Business and Financial Affairs, no employee, officer, or agent of the University shall participate in the selection, award or administration of purchases or contracts where to his or her knowledge the employee, his or her immediate family, or partner has a financial interest in the Supplier's organization.</p>
<p><b>11. Privacy and Security</b></p>	<p>Federal and state laws require the University and vendors to provide for the privacy and security of student and employee information. Suppliers are responsible for assuring that their employees, who provide any services to the University, are knowledgeable about, and comply with, the requirements of the Health Insurance Portability and Accountability Act (HIPAA), the Family Educational Rights and Privacy Act (FERPA), and any other Federal and State regulations pertaining to the services provided by the vendor.</p> <p>Suppliers shall comply with all federal and state laws and regulations, as well as University policies, procedures and guidelines relative to the confidentiality and privacy of University employees and students.</p>

ITEM DESCRIPTION	COMMENTS
12. Ineligible Vendors	The University expects each Supplier to (a) disclose whether any of its officers, directors or employees becomes sanctioned by, excluded from, debarred from, or ineligible to participate in any federal or state program or is convicted of a criminal offense related to their business operations and (b) assume full responsibility for taking all necessary steps to assure that Supplier’s employees directly or indirectly involved in providing goods and services to the University have not or are not currently excluded from participation in any federal program.
13. Other Laws	Suppliers will comply with all applicable local, national and international laws, regulations, treaties and industry standards, including, without limitation, those pertaining to the manufacture, pricing, sale and distribution and safety of the relevant products and/or services. Suppliers will safeguard the intellectual property, and ensure the information security, data protection, and privacy, of all work and communications relating to the University. In the event that the requirements of this Policy are stricter than applicable local, national or international law, Supplier will comply with this Policy. However, if there is any conflict between the requirements of this policy and the requirements of any applicable local, national or international law, Supplier is to comply with the local, national or international law. Supplier will notify University in writing of any such conflicts.
14. Visitation Policy	When visiting University facilities and departments, Suppliers shall comply with all building and department visitation and access policies.
15. Publicity	Advertising, including use of the University marks and logos, press releases, or any other general public announcement made by a Supplier, stating the availability of its products or services to University employees, is strictly prohibited unless the supplier has obtained prior written authorization from the University.

#### IV. DEFINITIONS

1. **“Supplier”** - An individual or company who provides good or services to the University.