

Boston College Supplier Ethics Policy

Policy Statement

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 paul.mcgowan.2@bc.edu.

Supplier Acknowledgement of This Policy

As a BC Supplier, you are expected to understand and accept this policy and to apply it in all dealings with, and on behalf of, BC.

Applicable Laws

As a BC supplier, you will comply with all laws, regulations and policies applicable to you and your dealings with BC, including all applicable government contractual requirements, which flow down to you through your 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.

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

As a BC Supplier, you 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 you. The prohibition extends to the offering, promising or giving of any favors to any family members of both your and BC's employees or with any other persons with whom you 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 you, 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 gifts
- Public disclosure should not embarrass BC
- Acceptance is consistent with BC business practices established in the [BC Professional Standards and Business Conduct Policy](#), and;
- Acceptance of the gift does not violate any applicable law

Conflict of Interest

As a BC Supplier, you 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. You 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 you. As the Supplier, any apparent conflicts of interest must be disclosed in writing to your BC contact for reporting to Internal Audit.

Unfair Business Policies

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

As a BC Supplier, you understand your 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.

Unauthorized Lobbying on Boston College's behalf Ethical Concerns

As a BC Supplier; you will promptly notify the BC Internal Audit Office regarding any known or suspected improper behavior by BC employees or agents relating to your dealings with BC.

Internal Audit Contact Information:

EthicsPoint Business Ethics Hotline: 855-327-4477 (Third Party Provider)
Email: intaud@bc.edu

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