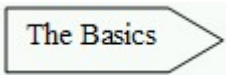
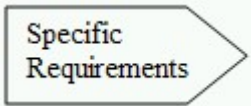
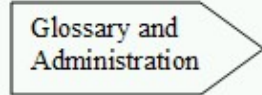


Procurement Policy Title: Supplier Code of Ethics and Conduct POL-PRO-P07	
Official Short Title: Supplier Code of Ethics	
Key Points	
<ul style="list-style-type: none"> ➤ Establishes the principles applicable to supplier ethical practice ➤ Manages third-party expectations as related to RMU ethical practices ➤ Reinforces the principles set forth in RMU’s Policy of Ethical Practice 	
Why do we have this policy? To establish the principles applicable to ethical conduct when engaging in business with the University as a third-party supplier.	Where does this policy apply? Moon Township Campus <input checked="" type="checkbox"/> Bayer Center <input checked="" type="checkbox"/> Island Sports Center <input checked="" type="checkbox"/>
What does this policy say? Establishes the guidelines for ethical conduct required for all third-party suppliers	Who in RMU has general obligations under this policy?
 1. Purpose 2. Scope	All RMU Employees
 3. Responsibilities 4. Policy 5. Communication of Issues	Responsible University Officer: Sr. VP Business Affairs and Treasurer
 6. Glossary 7. Administration 8. Related Policies	Contact: RMU Procurement Purchasing @rmu.edu

The Basics

1. PURPOSE

The RMU Supplier Code of Ethics and Conduct Policy (*POL-PRO-P07*) requires compliance with the highest ethical standards and all anti-corruption laws applicable to RMU (whether through an agent or otherwise) and to any vendor or service provider. RMU values integrity and transparency and has zero tolerance for fraudulent or corrupt activities of any kind, whether committed by RMU employees, or outside parties acting for or on behalf of RMU.

2. SCOPE

All RMU employees, and any others acting for or on behalf of RMU, to ensure that all dealings with outside parties, both in the private and government sectors, are carried out in compliance with all relevant laws and regulations and university policies and with the standards of integrity required for all RMU business.

Specific Requirements

3. RESPONSIBILITIES

Suppliers are required to comply with all applicable laws, codes or regulations of the countries, states and localities in which they operate. This includes, but is not limited to, laws and regulations relating to the following:

- Environmental Practices
- Occupational Health and Safety Practices
- Employment and Labor Practices

Suppliers are required to conduct their businesses in accordance with the highest standards of ethical behavior and in accordance with applicable laws and regulations. This includes, but is not limited to, the requirements in each of the following areas:

- Fair Trade Practices
- Bribery, Kickbacks, and Fraud
- Foreign Corrupt Practices Act
- Intellectual Property Rights
- University Policies and Procedures

Suppliers are required to abide by all economic sanctions or trade embargoes that the United States has adopted to halt trading, whether they apply to foreign countries, political organizations or particular foreign individuals and entities.

Suppliers are required to comply with all guidelines issued by the University relating to access to University facilities, offices and departments, and employees. Please refer to the University's [Solicitation Policy](#) for additional information.

Suppliers are required to conduct audits and inspections to ensure their compliance with this Supplier Code of Ethics and Conduct and applicable legal requirements. If a supplier identifies areas of non-compliance, the supplier agrees to notify the Procurement Department as to its plans to remedy any such non-compliance.

4. POLICY

The RMU Supplier Code of Ethics and Conduct requires compliance with the highest ethical standards and all anti-corruption laws applicable where RMU (whether through an agent or otherwise) conducts business.

All RMU employees, and any others acting for or on behalf of RMU, are to ensure that all dealings with outside parties, both in the private and government sectors, are carried out in compliance with all relevant laws and regulations and with the standards of integrity required for all RMU business. RMU values integrity and transparency and has zero tolerance for fraudulent or corrupt activities of any kind, whether committed by RMU employees, officers, or outside parties acting for or on behalf of RMU.

Bribes – RMU employees and any outside party acting for or on behalf of RMU, shall not, directly or indirectly, promise, authorize, ratify or offer to make or make any “payments” of “anything of value” (as defined in Section 6) to any individual (or at the request of any individual) including a “government official” (as defined in Section 6) for the improper purpose of influencing or inducing or as a reward for any act, omission or decision to secure an improper advantage or to improperly assist the company in obtaining or retaining business.

Government Officials –RMU’s policy prohibits payments by RMU or outside parties acting for or on its behalf to any individual, private or public, as a “quid pro quo” for business. The policy also prohibits “payments” of “anything of value”, or at the request of, “government officials” for any reason.

Facilitating Payments – For the avoidance of doubt, facilitating payments (otherwise known as “greasing payments” and defined as payments to an individual to secure or expedite the performance of a routine government action by government officials) are no exception to the general rule and therefore prohibited.

Kick Back – RMU Employees and any outside party acting for or on behalf of RMU, shall not directly or indirectly offer a kick-back, which is defined as a form of negotiated bribery in which a commission is paid to the bribe-taker in exchange for services rendered. Generally speaking, the remuneration (money, goods, or services handed over) is negotiated ahead of time.

The Supplier Code of Ethics and Conduct Policy reflects the University’s expectations with respect to suppliers. This Policy should not be read in lieu of but in addition to any supplier obligations as set forth in any (i) request for proposal or other solicitation, or (ii) agreements by and between Robert Morris University and the supplier. In the event of conflict between this

policy and any University solicitation document or applicable agreement, the terms of the University solicitation or agreement shall control.

No exclusions are applicable to this policy.

5. COMMUNICATION OF ISSUES

Questions regarding this policy should be directed to the Procurement Department at purchasing@rmu.edu.

Glossary & Administration

6. GLOSSARY

The terms defined herein should be construed broadly to give effect to the letter and spirit of this Policy. RMU is committed to the highest ethical standards of business dealings and any acts that create the appearance of promising, offering, giving or authorizing payments prohibited by this policy will not be tolerated.

Anything of Value: this term includes cash or cash equivalents, gifts, services, employment offers, loans, travel expenses, entertainment, political contributions, charitable donations, subsidies, per diem payments, sponsorships, honoraria or provision of any other asset, even if nominal in value.

Payments: this term refers to and includes any direct or indirect offers to pay, promises to pay, authorizations of or payments of anything of value.

Government Official shall mean:

- Any officer or employee of a government or any department, agency or instrument of a government;
- Any person acting in an official capacity for or on behalf of a government or any department, agency, or instrument of a government;
- Any officer or employee of a company or business owned in whole or part by a government;
- Any officer or employee of a public international organization such as the World Bank or United Nations;
- Any officer or employee of a political party or any person acting in an official capacity on behalf of a political party; and/or
- Any candidate for political office.

7. ADMINISTRATION

Approval: SVP Business Affairs and Treasurer

Owner: Assistant Director of Procurement

Author: Procurement Department

Approval Date: May 1, 2020

Effective Date: June 1, 2020

History: Policy updated 2-27-2012
Policy updated 11-23-2015
Updated 10-2019 to new standalone policy, new form and language.

8. RELATED POLICIES

POL-PRO-P01 RMU PURCHASING POLICY- BUYING GOODS AND SERVICES
POL-PRO-P02 RMU PREFERRED SUPPLIER POLICY
POL-PRO-P03 RMU COMPETITIVE BID POLICY
POL-PRO-P04 RMU SOLE SOURCE POLICY
POL-PRO-P05 SUPPLIER DIVERSITY POLICY
POL-PRO-P06 RMU CARD (P-Card) POLICY
POL-FIN-P01 RMU TRAVEL & BUSINESS EXPENSE POLICY
See above policies on the RMU Procurement website: rmu.edu/purchasing

[POLICY OF ETHICAL PRACTICE](#)

BOARD OF TRUSTEES CONFLICT OF INTEREST POLICY