

## Supplier Code of Conduct

The University of San Diego is committed to conducting its business affairs in a socially responsible, sustainable and ethical manner that is consistent with the University’s mission, and in full compliance with all applicable laws and regulations. Therefore, the University has adopted the following Supplier Code of Conduct to ensure that goods and services provided to the University are produced in a manner consistent with these principles.

This Supplier Code of Conduct is a statement of the University’s expectations and requirements with respect to suppliers. The Code is guidance for socially responsible business practices and describes the University’s expectations for Supplier policies and actions related to labor standards, human rights, sustainability, ethics, health and safety and diversity.

ITEM DESCRIPTION	COMMENTS
1. Compliance with Applicable Laws and Regulations	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.
2. Health and Safety	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).
3. Child and Forced Labor	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 Supplier will consult with the University to determine which standard will prevail.
4. Wages and Benefits	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).

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 these guidelines 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	The University is committed to fiscal, social, and environmental responsibility. 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. For additional information, see the Sustainable Procurement Guidelines at: <a href="https://www.sandiego.edu/procurement/resources/usd-sustainable-procurement-guidelines.pdf">https://www.sandiego.edu/procurement/resources/usd-sustainable-procurement-guidelines.pdf</a>
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 these guidelines
10. Conflicts of Interest	Conflicts of interest between a Supplier and a University employee, or the appearance thereof, should be avoided. 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.
11. Privacy and Security	Federal and state laws require the University and vendors to provide for the privacy and security of student and employee information. Suppliers are

	<p>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. 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>
12. Ineligible Vendors	<p>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.</p>
13. Other Laws	<p>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 Code are stricter than applicable local, national or international law, Supplier will comply with these guidelines. 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.</p>
14. Visitation Guidelines	<p>When visiting University facilities and departments, Suppliers shall comply with all building and department visitation and access policies.</p>
15. Publicity	<p>Advertising, including use of the University marks and logos, press releases, or any other general public</p>

	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.
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**Compliance Procedures**

Anyone who believes a vendor doing business with the University of San Diego has not complied or is not complying with this Code may contact the University's Procurement Department at (619) 260-7733.

**Definitions**

**“Supplier”** - An individual or company providing good or services to the University.