

SUPPLIER CODE OF CONDUCT

All third-party providers of goods and services to Barry University are referred to as “Suppliers” in this Code of Conduct. All suppliers to Barry University must 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 environmental, occupational health and safety, and labor practices. In addition, University suppliers must require their sub-contractors (including temporary labor agencies) to do the same.

ENVIRONMENTAL PRACTICES

All suppliers to Barry University shall comply with all environmental laws and regulations applicable to their operations at Barry University. Such compliance shall include, among other things, the following items:

- Obtaining and maintaining environmental permits and timely filing of required reports
- Proper handling and disposition of hazardous materials
- Monitoring, controlling and treating discharges generated from operations

OCCUPATIONAL HEALTH AND SAFETY PRACTICES

All suppliers to Barry University are expected to provide their employees with a safe and healthy working environment in order to prevent accidents and injury to health arising out of, linked with, or occurring in the course of work or as a result of the operation of the supplier. Suppliers shall, among other things, provide:

- Occupational health and safety training
- A system for injury and illness reporting
- Medical treatment and/or compensation to injured/ill workers arising as a result of working for supplier
- Machine safeguarding and other protective measures to prevent injuries/illnesses to workers
- Clean and safe facilities

LABOR PRACTICES

All suppliers to Barry University are expected to adopt sound labor practices and treat their workers fairly in accordance with local laws and regulations. In addition, suppliers must comply with the following standards:

- Freely Chosen Employment - suppliers shall not use any forced labor, whether in the form of prison labor, indentured labor, bonded labor or otherwise.
- No Child Labor - suppliers shall comply with local minimum working age laws and requirements and not employ child labor.
- Minimum Wages - suppliers shall provide wages for regular and overtime work and benefits that meet or exceed legal requirements.
- Working Hours - suppliers shall not require workers to work more than the maximum hours of daily labor set by local laws.
- No Harsh, Inhumane Treatment or Abuse - suppliers shall treat each employee with dignity and respect. In no event shall Supplier’s workers be subject to threats of violence, physical punishment, confinement or other form of physical, sexual, psychological or verbal harassment or abuse.

- No Discrimination - suppliers shall not discriminate in their employment practices on the basis of race, color, religion, sex, age, disability, national origin, ethnicity, sexual orientation, creed or any other basis prohibited by law.
- Freedom of Association - suppliers shall recognize and respect the rights of its workers to organize in labor unions in accordance with local labor laws and established practices.

ETHICAL BUSINESS PRACTICES

All suppliers to Barry University are expected to conduct their businesses in accordance with the highest standards of ethical behavior and in accordance with applicable laws and regulations. Suppliers are expected to conform to these requirements in each of the following areas:

- Fair Trade Practices - suppliers shall not engage in collusive bidding, price fixing, price discrimination or other unfair trade practices in violation of antitrust laws.
- Bribery, Kickbacks and Fraud - No funds or assets of the suppliers shall be paid, loaned or otherwise disbursed as bribes, "kickbacks", or other payments designed to influence or compromise the conduct of the University.
- Foreign Corrupt Practices Act - While laws and customs vary throughout the world, all suppliers must comply with foreign legal requirements and United States laws that apply to foreign operations, including the Foreign Corrupt Practices Act. The Foreign Corrupt Practices Act generally makes it unlawful to give anything of value to foreign government officials, foreign political parties, party officials, or candidates for public office for the purposes of obtaining or retaining business.
- Intellectual Property Rights - suppliers shall respect the intellectual property rights of others, especially the University, its affiliates and business partners. Suppliers shall take appropriate steps to safeguard and maintain confidential and proprietary information of the University and shall use such information only for the purposes specified for use by the University. Suppliers shall observe and respect all University patents, trademarks and copyrights and comply with all requirements as to their use as established by the University. Suppliers shall not transmit confidential or proprietary information of the University via the internet unless such information is encrypted in accordance with minimum standards established by the University.

EXPORT SANCTIONS AND TERRORISM ACTIVITIES

All suppliers to Barry University must abide by all economic sanctions or trade embargoes that the United States has adopted, whether they apply to foreign countries, political organizations or particular foreign individuals and entities. Suppliers should not directly or indirectly engage in or support any terrorist activity. Neither suppliers nor any of their affiliates, nor any officer or director of the supplier or any of its affiliates, should be included on any lists of terrorists or terrorist organizations compiled by the United States government or any other national or international body.

UNAUTHORIZED SOLICITATIONS

All suppliers to Barry University shall comply with all existing guidelines issued by the University relating to access to University facilities, offices and departments, and employees. No supplier shall use the University's computer system, including its electronic mail system and internet site, for the purpose of sending unsolicited electronic mail messages to the University community. Suppliers are not permitted to use the University's intraoffice mail system for unauthorized solicitation to employees.

SUPPLIER BEHAVIOR

All suppliers to Barry University are expected to conduct themselves in accordance with the highest standards of behavior and in accordance with applicable laws and regulations.

- No inappropriate conversations with, catcalling, harassing, yelling or whistling at residents, employees, students or passersby.
- No use of profanity or abusive language.
- No drinking alcoholic beverages or illegal drug consumption on premises.
- Do not block roads, drive-ways or alley's with vehicles, equipment or supplies unless authorized by the University.
- All workers and supervisors shall be properly attired at all times or wear company badge.
- **Barry University is a Tobacco and Smoke Free Campus.** Supplier, its employees, agents, subcontractors and invitees are prohibited from smoking and/or the use of any tobacco product in any area owned, operated, leased and/or controlled by the University, including but not limited to, buildings, green spaces, vehicles and parking areas. Violations may be grounds for removal from campus and/or termination of any contract with Supplier.

CONSTRUCTION WORKERS

- All construction workers must take breaks at a pre-determined area set aside by the Owner. No breaks will be allowed on sidewalks, curbs, steps, pathways or landscaped areas used by residents, students or employees.
- Area around the project premises shall be surveyed at the end of each work day and all debris created by the workers shall be disposed of daily.
- Portable toilet facilities shall be supplied by the supplier and used by his/her employees.
- Contact with management and employees shall be limited to the job Foreman or Supervisor and should be kept to a minimum.

MONITORING AND COMPLIANCE

The University or its representatives may engage in monitoring activities to confirm Supplier's compliance with this Supplier Code of Conduct, including on-site inspections, or other measures necessary to assess supplier's performance. Any University supplier or University employee that becomes aware of violations of this policy is obligated to notify the University Purchasing Department. Based on the assessment of information made available to the University, Barry University reserves the right (in addition to all other legal and contractual rights) to disqualify any potential supplier or terminate any relationship with any current supplier found to be in violation of this Supplier Code of Conduct without liability to the University.

Rev. 7.13.16

ACKNOWLEDGEMENT FORM
(To be submitted along with the Supplier Form)

The above Barry University Supplier Guidelines, Insurance Requirements and Code of Conduct are for your use and a source of information only. It is **not** a contract for goods and/or services. Your signature below acknowledges that you have read and understand the above stated information and agree to comply with the guidelines, insurance requirements and code of conduct.

Name

Title

Signature

Date