



University of Alberta Supplier Code of Conduct

Introduction:

The University of Alberta (university) is committed to sustainable procurement and purchasing practices. This includes leadership, social responsibility, inclusivity, environmental stewardship, ethical business practices and accountability. This commitment requires transparency and accountability by the university and the supplier community that supplies products, equipment and services to the university.

The university engages its supplier base and their subcontractors with the understanding that they will adhere to the university's Supplier Code of Conduct. The Supplier Code of Conduct reinforces our procurement and purchasing practices, policies, procedures and contracts. This Code of Conduct outlines the minimum performance standard expected from the university's suppliers and their subcontractors or agents who participate in any university procurement process.

The requirements of the Supplier Code of Conduct include the following:

- Adhere to the university's ethical and social performance standards.
- Provide safe and healthy workplaces to the people that make and supply products, equipment and services to the university.
- Meet internationally agreed upon standards as outlined by the [Declaration of Fundamental Principles and Rights at Work](#) as outlined by the International Labour Organization (ILO). This ensures human and civil rights are compliant and includes:
 - freedom of association and effective recognition of the right to collective bargaining
 - the elimination of all forms of forced or compulsory labour
 - the effective abolition of child labour
 - the elimination of discrimination in respect of employment and occupation
 - safe and healthy work environments
- Supporting Indigenous People and local communities in their Supply Chain. Suppliers are encouraged to identify, adopt and integrate diverse suppliers into their supply chain so their own supplier base reflects the diversity of society.
- Suppliers must comply with any contractual requirements related to information security and data protection and destruction.
- Ensure the university contracts only with suppliers that support ethical and socially responsible business practices and processes.

The requirement to adhere to this Supplier Code of Conduct is included as part of the university's contract award process within the university's standard SupplyNet terms and conditions, and the fully executed contractual agreements and for purchases made through our procurement purchasing card program.

The university's standards are based upon the ILO labour convention that supports the United Nations Universal Declaration of Human Rights. This is the minimum standard required at the university. Suppliers and their subcontractors and agents must comply with relevant laws, standards and regulations within the jurisdiction where work is being performed or product and services are delivered.

Application:

The university values suppliers that adhere to, support and respect the requirements outlined in the Supplier Code of Conduct. The Supplier Code of Conduct is supplementary and does not replace the supplier obligations set out in any contract between the university and the supplier. In the event of a conflict between the two, the contract will govern.

The university requires the suppliers' own supply chain to be compliant with the provisions of the Code of Conduct and the requirements outlined.

For the purposes of this Supplier Code of Conduct, "supplier" means the provider of products, equipment services, construction related services, software and intellectual property. All references to "supplier" also include subcontractors.

Compliance Requirements:

The Supplier Code of Conduct outlines the requirements of all suppliers with whom the university completes business activities with.

Suppliers shall comply with all provisions of the Supplier Code of Conduct and with relevant laws and regulations in the jurisdictions where the supplier operates with respect to manufacturing of product and equipment, development and protection of intellectual property rights, delivery of services and construction, and ethical business practices. This includes laws relating to working conditions, human rights, health and safety, and the environment.

Where applicable laws and the Supplier Code of Conduct address the same issue, the standard that is most stringent will apply. Where compliance with the Code of Conduct could lead to a violation of applicable laws or regulations, the supplier must notify the university as soon as possible outlining how they will operate in a compliant manner.

The university requires that all suppliers adhere to a consistent set of minimum standards relating to leadership, social responsibility, inclusivity, environmental stewardship, ethical business practices, human rights, fair workplace practices and accountability.

The university reserves the right to ask for proof of compliance with applicable labour, health and safety, and environmental laws. In addition, the university reserves the right to verify compliance through site visits and inspections by the university or designated agents.

Suppliers must maintain current detailed reports that substantiate their compliance with the university Code of Conduct. The University of Alberta believes in cooperation and consultation with their suppliers and will work with them to improve performance if deemed necessary.

Performance Standards:

Minimum performance standards include:

- Social responsibility

- working conditions
- fair and equitable labour practices
- Inclusivity
 - provide equal access and opportunities to people who might otherwise be excluded
 - making sure that everyone feels welcome, valued and respected regardless of race, national or ethnic origin, colour, religion, age, sex, sexual orientation, gender identity or expression or beliefs, marital status, family status, genetic characteristics, disability and conviction for an offence which a pardon has been granted or in respect of which a record suspension has been ordered (as outlined by the Canadian Human Rights Act).
- Environmental stewardship
 - responsible use and protection of the environment
- Ethical business practices
 - creating a culture where people are treated fairly, with dignity and respect
 - care for the needs of all stakeholders
 - compliance with ethical and legal obligations
 - providing qualified resources to complete any contracted work
 - outlining acceptable behaviors beyond government control
- Supplier Accountability
 - senior executive level support of sustainable procurement and purchasing practices
 - ownership of the activities for which the supplier is responsible for
 - monitoring of their supply chain
 - identifying and correcting non-compliance in their supply chain

The university aspires to work with suppliers that focus on protecting the health, safety and welfare of workers, while minimizing their impact on the environment and that adopt and implement ethical business practices. The university promotes continuous improvement opportunities relating to the Supplier Code of Conduct. This includes the university's supplier, its employees, subcontractors, and its agents.

Social Responsibility

Forced Labour

The supplier must employ workers who choose to be employed by the supplier. The supplier must not use any forced, bonded, involuntary, compulsory, slavery like circumstances or indentured labour. This includes work or services performed that is exacted or coerced from a person under threat, force of penalty or threatened abuse of law or legal process.

Suppliers cannot engage or benefit from any form of human trafficking including but not limited to recruitment, transportation, transfer, harbouring or receipt of persons.

No worker will be required as a condition of employment to make a deposit or surrender any government issued documentation, including passports, work permits or any other document that limits their ability to terminate employment.

All work shall be voluntary and workers are free to leave upon reasonable notification to the supplier.

Child Labour

The supplier cannot use child labour to manufacture product and equipment or provide services.

The term “child” refers to any person under the age of fourteen (14). Local law permitting, children under fourteen (14) are allowed to carry out light work that does not interfere with compulsory schooling.

Children under the age of sixteen (16) are not permitted to perform hazardous work.

Equity, Diversity and Inclusion

The supplier must promote and practice equity, diversity and inclusion (EDI) in the workplace. EDI is defined as “a policy or practice designed to make people of various backgrounds feel welcome and have the support to perform to their full potential in the workplace”.

Non-Discrimination

Supplier representatives (employees or agents) cannot at any time engage in discrimination based on race, religious beliefs, color, gender, gender identity, gender expression, physical or mental disability, ancestry, marital status, family status, source of income, age, place of origin, union membership and sexual orientation or any other grounds of discrimination prohibited by domestic or international law in their hiring and employment practices.

This includes but is not limited to hiring, promotion and training.

Employee Treatment

University suppliers must treat their employees with respect and dignity.

They will ensure their workers are free to express concerns about workplace conditions and have clearly defined avenues to express these concerns.

Health, Safety and Labour Practices

Health and Safety

University suppliers shall comply with all laws relating to occupational health and safety in all applicable jurisdictions. They will:

- provide a healthy and safe work environment
- provide workers access to all required personal protective equipment
- provide health and safety training
- provide training related to the operation of equipment
- provide a clean and safe work environment
- outline all safety regulations and safe work practices
- ensure all safety incidents, accidents and near misses are reported and investigated
- implement corrective action
- adhere to all applicable laws

Freedom of Association and Collective Bargaining

University suppliers are expected to work with their employees to resolve disputes and find resolution to any legal and employment issues. In addition, these employees have the right to obtain representation, join labour unions and bargain collectively.

Communication between employees and management relating to labour issues should be open and transparent; with the desire of both parties to resolve issues and improve working conditions.

Wages and Benefits

The supplier must comply with all applicable local laws and regulations relating to minimum wage and compensation.

The supplier must meet minimum requirements by law and provide direction to their employees relating to the following scenarios and any other that may apply, however not currently identified:

- Meet minimum wage rates and comply with all employment standards
- Compensate employees for overtime hours at the rate required by law
- Provide legally mandated benefits
- Provide clear records of hours worked, deductions, regular and overtime hours worked
- Provide pay and benefits in a timely, scheduled manner
- Provide rest period requirements, overtime, vacation and holiday time in accordance with local requirements
- Identify scheduled work hours to its employees
- Provide terms & conditions of employment, employee rights and responsibilities

Living Wage Requirement

Suppliers shall provide at a minimum, a living wage to their employees that will cover basic expenses.

Hours of Work

For products, equipment and services produced in and outside of Canada, suppliers shall comply with all employment standards and laws in their jurisdiction relating to hours of work, overtime hours and rest periods.

Environmental Requirements

Suppliers to the university shall work to reduce the environmental impact they have when providing products, equipment and services to the university.

Suppliers shall comply with the following requirements:

- Manage and reduce the negative environmental impacts on their operations, products, services and those of their own supply chain.
- Will meet all applicable environmental laws and regulations in the countries where they conduct business.
- Ensure all waste materials are disposed of properly in an environmentally responsible manner in compliance with the local and international laws and regulations.
- Implement industry standards aimed at conserving resources and reducing pollution, waste and carbon emissions.
- Commit to packaging standards that reduce the amount of packaging materials used.
- Will consider efficiencies and alternative modes of transportation in the delivery of products, equipment and services.

Business Ethics Standards

The university will contract with suppliers that conduct business ethically and with integrity. University employees are also held to high standards; they are expected to complete all activities ethically, professionally and with integrity. These standards for both the supplier community and the university require the following conditions:

- Suppliers should not offer money, gifts or other activities/events to university employees that are sourcing products, equipment and services at any time.
- Suppliers must comply with all applicable domestic and international law.
- Suppliers shall abide by any standards, rules and code of conduct set out by the bodies that govern the supplier.

- Suppliers shall abide by the university Supplier Code of Conduct; if they are not compliant they must identify the area(s) of non-compliance to the Manager(s) of Procurement and Contract Management to collaborate on future direction and corrective action.
- Suppliers shall follow and adhere to the Competition Act, RSC, 1985, C34 and other applicable acts.
- Suppliers shall adhere to all legislation and trade agreements that govern the MASH sector (Municipalities, Academic Institutions, Schools and Healthcare) in Canada.
- Suppliers shall refrain from providing misleading or inaccurate information in response to an invitation to submit to a bid, quote or proposal.
- Suppliers shall refrain from attempting to sway a participant in a sourcing process.
- Suppliers cannot be involved in any activity that might provide them with preferential treatment during a sourcing process of any type.
- Suppliers shall refrain from engaging in corrupt, or unethical financial, marketing or business practices.
- Suppliers shall not allow their workers to work on university premises at any time if they are impaired or intoxicated.
- Suppliers must comply with all applicable laws related to anti-corruption and anti-bribery. This includes, but is not limited to, Canada's Corruption of Foreign Public Officials Act, the United States Foreign Corrupt Practices Act and the United Kingdom's Bribery Act.

Animal Welfare

The university requires suppliers of animals and animal products for the purpose of teaching and research to meet the internationally-recognized standards of animal care. This includes standards identified by the International Council for Laboratory Animal Science (ICLAS) and International Guiding Principles for Biomedical Research Involving Animals.

- They shall follow best practices in supporting animal welfare
- They shall conduct their operations and activities in respect of the internationally recognized Three R's for animal use in research and testing:
 - Replacement: methods which avoid or replace the use of animals (e.g., cell culture)
 - Reduction: employment of any strategy that results in fewer animals being used
 - Refinement: modification of husbandry or experimental procedures to minimize pain and distress

They shall abide by all animal welfare laws and regulations in the countries where they conduct activities.

Where possible, procurement will occur from suppliers certified by the Canadian Council on Animal Care.

Reference to "animal" includes tissue or cell cultures, antibodies, blood products, enzymes or other substances that are derived from animals and used as reagents.

Supplier Onboarding, Accountability and Due Diligence

The Supplier and the university are responsible for ensuring that the Supplier Code of Conduct is adhered to consistently. This is accomplished by a thorough and complete onboarding of new suppliers at time of inception of the contract. This includes but is not limited to:

- Introductory meeting between the two (2) parties, that includes leadership and the key contacts that will be on site to complete work
- Review of the contract to outline the expected deliverables
- Review the expected timelines for completion of work
- Outline the billing process and submission of invoices

- Outline regulatory reporting requirements
- Identify unacceptable behavior on site. This includes, but is not limited to:
 - The use of Forced or Child Labour
 - The use of inappropriate language
 - Making inappropriate gestures or references towards individuals or groups
 - Aggression, gossiping, harassment, bullying or disruption
 - Drug or alcohol use
 - Oversharing of private or confidential information
 - Unreasonable demands on either party
 - Unsafe work practices and worksites
 - Discrimination of any type

Acceptable behavior on site, includes but is not limited to,

- A collaborative approach while completing the work by both the supplier and the university
- Performing work in an ethical, respectful and responsible manner
- Timely and documented notification of areas of concern or deficiency
- Remaining compliant with all applicable codes, directives, policies and laws in the jurisdiction the supplier is operating

The university will complete regular performance reviews with their contracted suppliers to ensure compliance with the Supplier Code of Conduct. Throughout the term of the contract period the university will identify:

- Areas of success
- Areas of deficiency will be outlined and documented. Corrective action plans will be outlined and implemented with clearly defined timelines to become compliant.
- Dispute resolution process; it will be managed in accordance with the contractual obligations of both the university and the supplier

Compliance and Monitoring

University suppliers are responsible for monitoring their compliance with these principles:

- Social Responsibility
- Health, Safety and Labour Practices
- Environmental Requirements
- Business Ethic Standards
- Animal Welfare

They shall seek continuous improvement opportunities in the application of these principles.

If an incident of non-compliance by a supplier should come to the attention of the university by a credible source, proof of compliance or further information will be requested.

If the university is of the opinion that a supplier has failed to demonstrate appropriate conduct in their business activities or in realigning their activities with the outlined principles, the university reserves the right to cease conducting business with the identified supplier, without financial penalty.