



# Procurement Code of Ethics Policy

***Effective November 27, 2024***

*Approved 27-Nov-24*



# Procurement Code of Ethics Policy

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## Purpose

- The Board of Directors is responsible for ensuring the Society has appropriate financial policies, which conform to legal requirements, directives from the Ministry of Children, Community and Social Services (MCCSS) and accepted principles of accounting.
- The purpose of this policy is to:
  - provide further direction for staff to facilitate compliance with the Financial Policies and Procedures governing policy
  - to adopt specifically, the Ontario Broader Public Sector (BPS) Supply Chain Code of Ethics

## Scope

The provisions of this policy apply to any person in the Society who has been granted authority for procurement activities by Financial Policies and Procedures (Governing Policy), including the following:

1. Board Members and appointees,
2. employees and volunteers, and
3. consultants and contractors engaged by the Society.

## Policy

### Ethical Code of Conduct

The Society will operate with a high degree of integrity to do what is honest, fair, and trustworthy in procurement decisions. All provincial and federal laws will be complied with. Suppliers will be treated with respect and be dealt with in a fair and unbiased manner. All quotation, pricing, and confidential information will be treated with respect. Gift or favours of material value will not be accepted by Society personnel or be tolerated in our supplier community.

### Conflict of Interest

It is required that the Society's procurement is conducted free of any conflict of interest. This means that it is required that staff make purchasing decisions solely in the best interest of the Society and will avoid any conflict of interest in such decisions. Further, this requires that all service providers and suppliers to the Society will be required to identify any conflicts of interest at the time of tender and throughout the course of providing service and goods to the Society.

### Ontario Broader Public Sector (BPS) Supply Chain Code of Ethics

Goal: To ensure an ethical, professional and accountable BPS supply chain.

#### I. Personal Integrity and Professionalism

Individuals involved with Supply Chain Activities must act, and be seen to act, with integrity and professionalism. Honesty, care and due diligence must be integral to all Supply Chain Activities within and between BPS organizations, suppliers and other

stakeholders. Respect must be demonstrated for each other and for the environment. Confidential information must be safeguarded. Participants must not engage in any activity that may create, or appear to create, a conflict of interest,



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such as accepting gifts of favours, providing preferential treatment, or publicly endorsing suppliers or products.

## II. Accountability and Transparency

Supply Chain Activities must be open and accountable. In particular, contracting and purchasing activities must be fair, transparent and conducted with a view to obtaining the best value for public money. All participants must ensure that public sector resources are used in a responsible and efficient manner.

## III. Compliance and Continuous Improvement

Individuals involved with purchasing or other Supply Chain Activities must comply with this Code of Ethics and the laws of Canada and Ontario. Individuals should continuously work to improve supply chain policies and procedures, to improve their supply chain knowledge and skill levels, and to share leading practices.

## Procedure

1. Staff must not have a pecuniary interest, either directly or indirectly, in any contact with suppliers to the Society.
2. Staff who have been delegated the authority to purchase and/or commit funds shall:
  - a. Not use their authority for personal gain and shall seek to conduct themselves with high regard for business ethics and protection of the reputation of the Society.
  - b. Be free of interests or relationships which are actually or potentially unfriendly or detrimental to the best interests of the Society.
  - c. Not purchase any goods or services from an employee or close relative of an employee without the prior consent of the Director of Finance and Property.
3. Staff who are involved in purchasing are expected to adhere to the following:
  - a. Open and honest dealings with everyone who is involved in the purchasing process – this includes all businesses and people with which the Society contracts or from which it purchases goods and/or services, as well as members of the Society staff.
  - b. Fair and impartial award recommendations for all contracts – this means that staff are not to extend preferential treatment to any supplier. Preferential treatment is not good business practice since it limits fair and open competition for all vendors and is therefore a detriment to obtaining the best possible value for each dollar.
  - c. An irreproachable standard of personal integrity on the part of purchasers and others in the purchasing processing. Absolutely no gifts or favours can be accepted by purchasers and others in the purchasing process. Also, the purchasers and others cannot publicly endorse any one supplier in order to give that supplier an advantage over others.
  - d. Cooperate with other public agencies when buying. The use of cooperative purchasing should be pursued to obtain the greatest advantage for the Society.
4. The purchaser must determine if there is any conflict of interest by a potential or current provider of goods/services. This will be captured through obtaining from a current or potential vendor, their assertion and certification as to their freedom from conflict. Every request for proposal, contract, and establishment of supplier relationship with the Society



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will seek information with respect to conflicts from the supplier and will specify that the Society has the right to determine if there is a conflict of interest and the action that will be taken in the event there is a conflict.

5. It is expected that vendors will only be selected that meet the minimum criteria as follows:
  - a. Have not violated the trust and resources of the Society in past dealings.
  - b. Are known to be a fair, equitable and trustworthy organization.
  - c. Have the capability to provide the goods or services as and when needed by the Society.
  - d. Have satisfactory references from other companies to which the vendor delivers.
  - e. Are not unduly reliant on the Society for its financial health.

## Other Related Policies

The Society's Code of Conduct identifies and establishes the principles of conduct that govern the actions of individuals with the Society. This policy is intended to supplement those guidelines already in place with procurement specific standards.

For additional direction, staff are to refer to other affiliated policies including but not limited to:

- Financial Policies and Procedures – January 2023 (revised)

## Effect on Prior Policies

The effective date of this policy is referenced below. Any prior policies regarding purchasing and other matters dealt with in this policy are hereby superseded. This policy shall have no effect on purchases made or contracts executed prior to the date this Policy is approved.

**Approval Date:** November 27, 2024

**Effective Date:** November 27, 2024

**Last Revised Date:** Not Applicable

