



Section: Procurement Guidelines

Subject: "No Gift" Policy of Division of Strategic Sourcing and Supply Chain Management

I. Purpose

As internal guidelines and supplemental guidance under Section XVII of the Procurement Policy/Regulation, "Ethics," this "No Gift" Policy shall govern the conduct of all staff, including managers, directors, and the Vice President, employed in the Division of Strategic Sourcing and Supply Chain Management. The Division consists of the Procurement Management, Procurement Construction Services, Contract Management, Small Business Program, Real Estate Services, Value Analysis/Value Engineering, and the Supply Chain Management departments which are responsible for the procurement of all goods and services, including construction services, and the receipt, distribution, control, tracking, and retirement of all products and assets utilized in Jackson Health System. This Procurement Guideline is supplemental to all County ordinances and Public Health Trust resolutions and policies governing employee standards of conduct and conflicts of interest, including Section XVII of the Procurement Policy/Regulation.

II. Procedures

1. The "No Gift" Policy took effect on November 21, 2005, by way of a memorandum signed by the Division Vice President on that date, and has remained in effect continuously. The purpose here is to incorporate the policy into the series of Procurement Guidelines issued by the Chief Procurement Officer, who also functions as the Vice President, Strategic Sourcing and Supply Chain Management Division. The "No Gift" Policy, and this Procurement Guideline No. 3, as fully described below, applies only to staff employed in the Strategic Sourcing and Supply Chain Management Division.
2. To avoid even the appearance of a conflict of interest, and to demonstrate the Division's commitment to impartiality, equal treatment and the highest standards of conduct in relation to all vendors and potential vendors of the Public Health Trust/Jackson Health System, the following "No Gift" policy shall apply: ***No gifts of any kind, of any value, shall be accepted, on or off the work site, by the vice president, directors, managers, supervisors, and staff of the Strategic Sourcing and Supply Chain Management Division from any vendor or any individual acting on behalf of a vendor.***
3. The word "gift" means any item (pens, calendars, hats, bags, meals, cash or candy for example) having any cost or financial value, including food or beverages, and including vendor-sponsored meals or parties. Greeting cards are allowed. The word "vendor" means any business or commercial enterprise and any individual acting on behalf of any business or commercial enterprise, whether or not the vendor presently has a contract with the PHT/JHS.
4. This "No Gift" Policy applies equally to all vendors. Our purpose is not just the equal and fair treatment of all vendors *in fact*, but *also* the *appearance* of equal and fair treatment. We are confident this is a standard that reflects positively on ourselves in the Strategic Sourcing and Supply Chain Management Division that works daily with vendors, and also on the vendors and potential vendors of this public health institution.
5. Vendors shall be kindly informed of this "No Gift" policy and the reasons for it, and shall be asked respectfully not to deliver or deposit any gift either for individuals or for a particular department or office. This policy applies equally to all vendors. Any gift that is received shall be returned to the giver whenever feasible, and when not feasible shall be delivered to the



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office of the Executive Assistant of the Vice President for Strategic Sourcing who shall see that all such items are donated to a non-profit institution not related to PHT/JHS.

6. This policy is supplemental to all other "gift", "ethical" and "standards of conduct" legislation, ordinances and policies of the State, County and the PHT which shall continue to apply fully. This "No Gift" policy shall be made available to all staff of the Strategic Sourcing and Supply Chain Management Division and all vendors of the Public Health Trust/Jackson Health System.

III. References

Responsible Party:

Sr. Director, Procurement Goods and Services
Strategic Sourcing and Supply Chain Management

Director, Procurement Construction
Strategic Sourcing and Supply Chain Management

Associate Vice President Supply Chain
Strategic Sourcing and Supply Chain Management

Vice President and Chief Procurement Officer
Strategic Sourcing & Supply Chain Management

Reviewing Committee(s): Not Applicable

Authorization: Department Head