



PURCHASES AND PAYABLES POLICY

of

The American College of Greece

I. Purchasing

I.1. Purchase Requisition:

All purchases of goods and services are initiated through Standard Requisition Forms (SRF). In addition to purchases, all activities that result in the creation of additional expenses for the College should also be initiated through SRF (like receptions where food, snacks or drinks should be provided). Campus reservations, help from technical services staff, reservations of multimedia technology for events, student activities etc, should not be performed through SRF, as there is no additional expenses associated with these activities.

There are **65** Departments within The American College of Greece which are authorized to issue SRF (see Appendix I). At the beginning of each fiscal year (July 1), the Business Affairs office issues each department a set of SRF numbers to be used consecutively for the fiscal year (July 1 to June 30).

The expenses associated with each SRF are charged towards the annual budget of the Department that initiated the SRF. Departments should avoid preparing SRF for costs that they don't wish to be charged to their budget.

Standard requisition forms should be approved signed or electronically approved signed by:

- the corresponding head of the requesting department (see Appendix I) and
- the head of the Unit
- The President may give approval for all Departments and Units

The College Units are:

<u>Unit Head</u>	<u>College Unit</u>
- David G. Horner	President's Office
- Thimios Zaharopoulos	Academic Affairs
- Kelly Morra	CFO
- Iliana Lazana	Human Resources & Campus Services
- Dimitris Andreou	Administration & Enrollment
- Gabriel Alexopoulos	Controller
- Eric Trujillo	Pierce College Principal
- Thimios Zaharopoulos	Provost
- Claudia Carydis	Public Affairs
- Niki Boutari	Marketing
- Costa Axarloglou	ALBA Graduate Business School

The unit heads are requested to proceed and approve their SRF's on a daily basis.

Standard requisition forms SRF are issued through NAVISION PURCHASING MODULE

After approval by the Unit head is obtained, all SRF will immediately be forwarded to the Operations Department for further process.

I.2.1 Bidding Procedure:

The Operations Department (OD), is responsible for obtaining bids for all SRF received. The OD may request the assistance of other College Departments in order to receive help in the following areas:

- a. selection of vendors (Purchasing Quotations PQ)
- b. preparation of specifications
- c. Evaluation of bids

No other Department (with the exception of the Business Affairs and Technical Services) should be engaged in the direct obtaining or negotiating of bids (exception: when a special committee is appointed to assist in purchasing – see below).

A minimum of two (2) bids is required for all items costing more than Euro 500 and three (3) bids for all items costing more than Euro 3000 . Items costing under Euro 500 can be purchased with only one bid. All bids should be in writing and signed by the supplier. Fax and email bids addressed to the OD are also acceptable. Telephone bids are acceptable for items costing less than Euro 500.

If it is impossible to secure more than one bid (ex. commodities that are sold only by one source in Greece) a short memo/note identifying the reasons for deviating from the three bid rule should be attached to the SRF by the OD.

After all bids are received, the SRF's (with the bids attached) are routed to the Head of the Operations Department, Technical Services Department who recommends the lowest bid or the best combination of bids. Then the SRF is routed to the VP of HR & Campus Services who selects the best bid. If the lowest bid is not selected (due to quality reasons, similarity to existing goods, etc), a short memo/note identifying the reasons for deviating from the lowest-cost rule should be prepared and attached to the SRF.

The SRF with total **cost over €500.-** are forwarded to the Business Affairs Office for approval of the purchase. The Controller approves the purchase after considering:

- a. the requesting Department's budget.
- b. the bidding process followed
- c. the cash flow required
- d. possible insurance, liability and tax conflicts that may exist.

The SRF with total **cost below €500.-** are routed to the head of the Operations and Technical Services Departments for approval. After this approval SRF are preceded for purchase.

When an ad-hoc or a standing committee is engaged for purchasing goods and services (USAID, capital projects, events and ceremonies, etc), the committee provides specifications for bidding and vendor recommendations to the OD. The OD then forwards RFPs to selected vendors and receives all the bids. All bids are then submitted back to the committee for evaluation and recommendation for purchasing. Budget approval is required before ordering.

I.2.2. Urgent Purchases:

Purchases for goods and services needed urgently follow a simplified procedure. The SRF carrying the notification "Urgent Purchase" is still approved by the Controller and the VP of HR & Campus Services, but three bids are not necessary. The number of urgent purchases should be kept at a minimum. Timely and effective planning is required from all departments requesting goods and services.

I.2.3. Urgent Cash Purchases:

Before any cash purchases for goods and services, please contact Procurement Services for assistance, guidance. The cash receipts/invoices MUST be delivered to Procurement Services within 24 hours accompanied by SRF.

I.3. Ordering / Contracts:

Orders are placed by phone, fax or email only from the following departments:

- Operations
- Technical Services
- Business Affairs

For some items of significant value, a contract is signed in most cases between the supplier and the College for better accuracy, timely delivery and security. For such purchases an SRF is necessary and the bidding process should be followed.

Contracts are prepared by the Operations, Technical Services in cooperation with Business Affairs. Business Affairs then has the responsibility to review all contracts and prepare them for the final signing. Only the President and the Controller have the authority to sign contracts for the College (Power of Attorney).

I.4. Receiving

Goods are received by the head of the department who initially ordered them or by the Operations Department. Upon the receipt, the department who initially ordered them is required to carefully check the product quality and quantity. Objections or complaints about the products received are only accepted within 5 working days from the time the order is completed and products are received by the department.

The invoice is then forwarded to Procurement Services, where it is reconciled with the SRF and the bids. It is then referenced with the number of the corresponding SRF. The SRF is then attached to the first suppliers' invoice of the respective SRF

According to Greek tax law all invoices should be recorded in the books of the College by the 15th of the month following the month the invoice was issued. As a result, all invoices should be promptly processed by all departments involved.

I.5. Recording (Business Affairs Annex):

Based on the invoice, attached to the SRF and the bid package, a Journal entry is prepared for the recording of the purchase transaction. All Journal entries are approved by the Controller. After approval, posting is performed.

I.6 Payments (Business Affairs Annex):

Payments are generally performed once a month by checks produced by an automated payment system. Checks typically are mailed to the suppliers; occasionally they may be delivered by hand. Advances and payments according to special agreements may deviate from the above rules.

Computerized payment vouchers (bank movement sheets) are prepared for the recording of the payments by the Accounting Department. All payment vouchers are approved by the Controller before posting in the General Ledger.

I.7. Imports (Business Affairs Annex):

Imports are made mainly for books, fixed assets and equipment. SRF are approved as discussed above. In many cases, imports are made from exclusive suppliers without obtaining bids. Approval and ordering of library books from foreign suppliers is handled directly by the Business Affairs Office.

II. Capital Projects

II.1. Building Projects

For each building project an architect is selected either by direct appointment by the administration of the College (with the approval of the President) or by a bidding process. The selection is based on the architect's experience on similar projects and the cost of his/her offer.

The architect works under the supervision of Technical Services to prepare construction plans that are submitted to the City Building Authorities for building licenses. The architect is (in most cases) also responsible for the project management and the supervision of the construction project. The Head of Technical Services, in coordination with the architect, also supervises the project focusing on the timing, the quality of the works and the budget associated with the project.

II.2. Selection of Contractors

To eliminate the need to supervise several different contractors and in order to save time and achieve a uniform quality in the building projects, the Administration prefers to hire one general contractor for each of the major building projects.

A number of general contractors proposed by the Administration of the College and/or the architect are supplied with bidding packets (including plans, specifications, etc.) and are requested to submit formal bids for the project. The bids are received and opened by a committee composed of officers of the Technical Services and the Business Affairs or as appointed by the President.

Usually, the lowest cost bidder is proposed for selection. Other basic criteria apart from the price are the following: ability and experience to perform such projects, reputation in the market and quality of previous projects. The final selection and appointment of the general contractor is made by the President.

For all capital projects over €15.000. - a contract is agreed upon and signed as described in paragraph I.3 before any construction works commence.

II.3. Invoicing of works performed

On a periodic basis, the general contractor issues invoices corresponding to the works performed during the period and as described in the contract. The invoices on works performed are submitted to the architect for approval (if the architect is also responsible for supervision of the project). Then, the Head of Technical Services double-checks all the quantities and makes sure that the prices applied to each line item are the same with those included in the contract. Special care is given to works appearing in the "new works" section of the report since those items are not described by the contract. The invoices are then submitted for approval and payment to the Business Affairs.

III. USAID Grants

Almost every year the College has received Grants from USAID for building construction and/or procurement of educational commodities (computers, books, software, etc)

All USAID grants have budgets that are previously approved by USAID and should be closely followed within a 10% allowance for budget fluctuation. Quarterly progress reports are submitted by Business Affairs to USAID, describing grant activities and procurements for the period. Before submittal to USAID some reports are also approved by the Chair of the Board of Trustees, according to USAID requirements.

All procurements made for the USAID projects are executed under the direction of a dedicated ad-hoc procurement committee. Such committees are appointed by the President and have to follow strict procurement rules, which include:

- a. Prior approval by USAID of all commodities to be purchased
- a. A minimum of 3 bids for all purchases
- b. USAID defined source, origin requirements for all commodities
- c. Prior USAID approval in case of proprietary procurements (without 3 bids)
- d. Selection of the lowest cost bidder is mandatory by USAID rules.

All grants have a Project Assistance Completion Date (PACD), which is the final deadline for all project activities. USAID approval is required in order to receive an extension of the PACD.

A comprehensive USAID grant close-out report is due after the completion of the PACD. This report prepared by Business Affairs and the Development Office describes all activities and presents all purchases in an itemized format.

Appendix I

ACG DEPARTEMENTS
PRESIDENT
Office of the President
Libraries
Board Of Trustees
Institute of Public Health
Human Resources
Technical Services & Buildings
Gardens and Grounds
Development and Archives
Registrar (all Campuses)
ACG Art
Alumni Relations
Enrollment Management
Career Services
Athletics
Student Affairs
EAPP
Academic Advising
IMC
Media Relations
Publications
Health Services
Student Success Center
Continuing Education
Institute of Diplomacy and Global Affairs
Business Office
Academic Affairs

Media Services
School of Business Administration
School of Arts and Sciences
Graduate School
IRM
Special Collections
Performing Arts
Public Affairs
Pierce College Theatre and College Activities
Operations
College Cars and Drivers
Procurement
Cleaning /Materials
Telephone Center & Mailing
Xerox
College Events (Food Services and Caf)
Security
Transportation Buses
Principal & Pierce Administration
Gymnasio /Lykeio
Highschool Counselling center
Afternoon Program
English Dept
International Baccalaureat
Office of Enrollment Management & Student Services
European Student Recruitment
Financial Aid
Study Abroad
ALBA Dean's Office
ALBA Academic Administration
ALBA Graduate Business School
ALBA Marketing
ALBA International
ALBA Alumni & Career
ALBA Quality
ALBA Corporate Affairs
ALBA Business Development
ALBA EMBA

The American College of Greece



**PROCUREMENT PRINCIPLES
“CODE OF CONDUCT”**

March, 2015

ACG Management Commitment

ACG is committed to the highest standards of social and environmental responsibility and ethical conduct. It is imperative that we provide clear guidance with respect to proper business conduct and ethical behavior to the people who represent us in carrying out their daily duties. Our multi-cultural business model allows us to rely on local management to best serve the needs of ACG with due recognition of local cultures. However, this freedom to manage and make decisions requires employees to operate at the highest levels of transparency, honesty, integrity and responsible behavior. It is with these principles in mind that we set forth in the following pages to establish common guidelines that are core to ethical business conduct throughout the institution. With this Code of Conduct, we provide a statement of operating principles to help each of us understand what is expected, as we do our individual jobs every day. Where there is any doubt or when we face unusual circumstances, we should always seek a qualified opinion. This Code should be viewed by all as a commitment by ACG Management and all employees to achieve excellence in the way we do business, by adhering to the highest standards of corporate and social responsibility. A prerequisite for our commitment to these principles and Values is that we take the time to read the Code of Conduct carefully, review our actions in light of its guidelines and ensure that it is fully understood and implemented by all ACG community. To the best of our abilities, we shall also use our influence to promote the above principles to our contractors, suppliers and business associates.

ACG's suppliers are required to provide safe working conditions, treat workers with dignity and respect, act fairly and ethically, and use environmentally responsible practices wherever they make products or perform services for ACG. ACG requires its suppliers to operate in accordance with the principles in this Supplier Code of Conduct ("Code") and in full compliance with all applicable laws and regulations. This Code goes beyond mere compliance with the law by drawing upon internationally recognized standards to advance social and environmental responsibility. This Code outlines ACG's expectations for Supplier conduct regarding labor and human rights, health and safety, environmental protection, ethics, and management practices. ACG will assess its suppliers' compliance with this Code, and any violations of this Code may jeopardize the supplier's business relationship with ACG, up to and including termination. This Code applies to ACG suppliers and their subsidiaries, affiliates, and subcontractors (each a "Supplier") providing goods or services to ACG. Your support is essential in making this Code a key tool in promoting the well-being of our institution and all employees.

Office of Human Resources & Campus Services

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PURCHASING & SUPPLY SERVICES

The mission is to directly support the institution's environmental, educational and administrative needs. By using best business practices and professional ethics we assist faculty and staff in obtaining high quality products and services in a timely matter and at the lowest cost possible. Purchasing recommends environmentally preferable products whenever they perform satisfactorily and are available at a reasonably competitive price.

Purchasing & Supply Services will also continue to work very closely with our many local suppliers to minimize transportation costs while simultaneously supporting our local economy.

ENVIRONMENTAL PURCHASING PURPOSE

ACG is committed to responsible stewardship of the environment. The purpose is to support the institution's sustainability and stewardship effort by providing guidelines, information, and resources for the purchase of products that have the least negative impact on the environment to the greatest extent practicable.

BEST PRACTICES AND PROCUREMENT STRATEGIES

Reduce waste: Purchase products made from recycled materials and materials that can be reused. Use recycled paper and office supplies and remanufactured toner cartridges in lieu of virgin items.

Purchase durable and reusable goods: Consider a product's estimated life span, energy, maintenance, consumable supplies, and disposal costs. Some suppliers will take back used items when new ones are purchased.

Order products less frequently or in bulk: This is especially true for office supplies.

Surplus: Asset Management will effectively redistribute or dispose of surplus property.

SELECTION OF SUPPLIERS

It is the responsibility of the Purchasing Department to select sources of supply. Potential vendors are selected for their ability to serve the needs of the institution in an economical and efficient manner on a continuing basis. Past performance of vendors and cooperation with the institution are important factors in vendor selection. The Purchasing Department also needs the support of clients to maintain good vendors by their timely processing of receiving reports and invoices.

The Purchasing Department is committed to recruit new vendors, including vendors who are from disadvantaged or from under-represented groups. Whenever possible, more than one source will be sought and considered. Alternate or multiple sources of supply are maintained as a means of insuring quality, service, minimum costs, and a favorable environment for the procurement of goods and services.

End users are encouraged to suggest sources of supply, particularly for unusual or non-standard items. The Purchasing Department will follow a client's recommendation as much as possible. If a client requests a specific vendor with no substitutions, adequate justification should accompany the requisition for consideration.

Supplier Diversity: ACG will promote the development of significant and mutually beneficial business relationships with diverse and local suppliers. The university will put forth a good-faith effort to utilize diverse businesses, when practical.

Small Business Administration: ACG will promote equal access to ACG's procurement opportunities.

Relationships with Suppliers: ACG will maintain the highest standards of business ethics and conduct when interacting with suppliers. Relationships with suppliers will support the promotion of environmentally preferred practices, diverse business utilization, and small businesses.

QUALITY OF MATERIALS

The Purchasing Department is committed to procuring required materials of a quality suitable for their intended use and to assist ACG departments in determining the required quality of said materials. Quality is a measure of the suitability and cost (not only price) of a product for its intended use. Determining the proper quality is of greatest importance, since to buy a higher quality than is required is often as wasteful as buying a lower quality.

Quality is determined by balancing two factors: the technical consideration of suitability and the economic consideration of price and availability.

The right to determine specifications for quality, including the right to change the specifications, rests with the client responsible for the performance or use of the materials.

SMALL, REPETITIVE ORDERS

Small repetitive orders should be increased in quantity of items and decreased in frequency, particularly if there are quantity discounts available. Frequent small orders are also costly to the institution, as they result in increased handling by Receiving and Accounts Payable personnel.

One of the best ways to handle small repetitive orders is to consolidate them into Blanket Orders. Consult with the Purchasing Department staff on procedures and sources for these orders.

BUY, LEASE, RENT

The decision to buy, lease, or rent is made on an individual case basis. The factors considered are purchase price, maintenance/service costs, life expectancy of equipment, obsolescence, cash flow, interest rates, and funding source. Where the duration of need is known to be very short, items may be rented. This would apply to items such as recycle waste bins, technical equipment, special copiers, and equipment for special events (i.e. commencement).

ENVIRONMENTAL AWARENESS

Environmentally Preferred Procurement: ACG will identify and promote environmentally responsible procurement by featuring sustainable products and services, practices, processes, and procedures. Environmental impact should be considered in purchasing decisions, when appropriate. ACG encourages departments to consider the use of products and services that impact the environment less than competing products, when it is a good best value decision to do so. A good best value decision based on a thorough total cost of ownership analysis considers the initial cost of the item as well as factors such as:

Energy Efficiency: Purchase equipment that is Energy Star-rated (or, if there is no Energy Star rating, equipment that is highly energy efficient). Energy Star is a program helping businesses and individuals protect the environment through superior energy efficiency.

Shipping Materials: Purchase products that are shipped in containers that are returnable or reusable and made from recycled content (i.e. cardboard boxes). Also request bulk packaging when multiple items are ordered for delivery at the same time.

Recycled Content: Purchase products made with recycled content suitable for the intended use. Look for a high percentage of post-consumer content. 'Post-Consumer' is material that has served its intended purpose and has been discarded for disposal or recovery by a business or consumer. Other recycled content includes post industrial wastes which are by-products of a manufacturing process that would normally not be reused in the process.

Waste: The institution strongly desires to minimize the amount of waste sent to landfills. Both the product purchased and the packaging materials associated with it should be minimized to prevent waste as much as possible. Environmental performance of the supplier and/or producer should

also be considered, such as waste prevention, waste reduction, pollution prevention, clean air and water programs, re-use of materials, minimization of scrap material, and any other green factory initiatives, etc.

PROCURE PRODUCTS CERTIFIED TO MEET SUSTAINABILITY STANDARDS, WHENEVER PRACTICABLE

Paper and Forest Products:

- Chlorine Free Products Association www.chlorinefreeproducts.org
- Forest Stewardship Council www.fsc.org

Electronics and Appliances:

- Energy Star www.energystar.gov/purchasing
- Electronic Product Environmental Assessment Tool (EPEAT) - www.epeat.net

Cross-sector:

- Environmental Choice www.ecologo.org
- Green Guard www.greenguard.org
- Green Seal www.greenseal.org
- Scientific Certification Systems www.scsglobalservices.com

Renewable Energy:

- Green-e www.green-e.org

Building Practices and Indoor Air Quality:

- Green Building Council (LEED) www.usgbc.org/leed

Purchase remanufactured products and refurbish existing products:

It is less expensive to buy remanufactured toner cartridges than OEM cartridges, less expensive to upgrade existing computers than replace, and it is less expensive to repair, rather than replace, carpet.

Purchase products containing fewer toxic constituents:

Products with fewer or no toxic chemicals can reduce hazardous waste disposal, future liability concerns, and the risk of occupational exposure and spills.

Reduce paper use: Set printers and copiers to the default duplex mode. Utilize technology to send and store information electronically. E-mail documents instead of faxing or shipping hardcopies and electronic document storage instead of storing hard copies.

Guidelines and Recommendations: Purchasing & Supply Services will make every effort to secure contracts with suppliers that are socially and environmentally conscientious and certified green.

- ACG will promote the use of recycled and other environmentally preferable products.
- Purchase recycled and environmentally preferable products whenever practicable, like hybrid or alternative fuel vehicles.

Socially Responsible/Ethical Purchasing Standards: Commitment to sustainability, safe and healthy workplaces for the people who make the products. For additional information regarding the importance of ethical purchasing:

- Verite (www.verite.org)
- Workers' Rights Consortium (www.workersrights.org)

ACG Procurement Code of Conduct

Overview

This document is provided to give individuals an overview of their code of conduct responsibilities when conducting procurement activities. All individuals within a tender evaluation are jointly responsible for ensuring that the procurement process, in addition to all communications, meetings, discussions etc. are properly conducted in an equitable and transparent manner and that all documentation and decisions are recorded for provision of an audit control. Furthermore, individuals should respect confidentiality of information and never use it for personal gain.

Code of Conduct

1. It is Imperative that any direct approach by any bidder in relation to procurement is IMMEDIATELY advised to the ACG Procurement services office. It is recognized that some members of the evaluation team involved with the procurement may have contact with or have to work with existing suppliers/contractors who are also bidders. This may also occur with bidders who were successful or unsuccessful at any pre-qualification stage. In these circumstances, evaluation team members must not enter into any discussions regarding the procurement and must refer any such approaches immediately to the Procurement Office.
2. An evaluation team member must not communicate in any form to any bidder or to anyone outside of the evaluation team with regards to the procurement.
3. Maintain the highest standard of integrity, remaining impartial and professional in all business relationships.
4. You must:
 - ✓ Give consideration to ACG's mission
 - ✓ Obtain maximum value for each euro spent
 - ✓ Grant all competitive suppliers fair and equal consideration
 - ✓ Conduct business with potential and current suppliers in an atmosphere of good faith
 - ✓ Demand honesty in sales representation
 - ✓ Receive consent of originator for use of proprietary ideas and designs
 - ✓ Make reasonable effort to obtain equitable settlement of any controversy with a supplier
 - ✓ Accord a prompt and courteous response to all who call on legitimate business
 - ✓ Foster fair, ethical, and legal business practices
 - ✓ Protect the institution's interest by ensuring suppliers honor all terms of their contracts

Conflict of Interest

Further to the code of conduct above, anyone involved in procurement activities must also declare any potential conflict of interest as stated below:

- 1) It is imperative that any evaluation team member who has a conflict, or potential conflict, of interest with the procurement must immediately declare this to the Procurement Office. This should be documented by the Procurement Office and may result in exclusion of the member from the procurement process. Any relevant changes in circumstances must be reported immediately to the Procurement Office.
- 2) You must declare any personal interest that might affect, or be seen to affect your impartiality or decision making. Evaluation team members must declare an interest if;
 - a) He or she has *at any time* worked for or intends to work for, and has received payment for that work from, a bidder or potential bidder.
 - b) He or she has any *current* personal interest in a bidder, even if it does not relate specifically to the commodity under review. This may include an evaluation team member or a member of his/her

- immediate family having shares in any bidder likely to bid, having a controlling interest in a potential bidder or having any personal relationships with potential bidders.
- c) The institution that a member works in has *at any time* worked, or intends to work, with a bidder or potential bidder on the commodity under review.
 - d) The institution that the member works in, or the member himself/herself, is *currently* receiving, or intends to receive, payment from a bidder or potential bidder. This is regardless of whether the payment relates directly to the commodity under review or not.
- 3) an evaluation team member must declare an interest if he or she becomes aware that a commodity supplied by a company in which he or she has a current personal interest, or from which the member is receiving, or intends to receive payment, may be considered by the evaluation team as an alternative to the commodity under review.

Anti-Bribery

All ACG transactions must be carried out lawfully and ethically, in accordance with all applicable laws and regulations and must always respect the United Nations Convention against Corruption (UNCAC – UN Resolution 58/4 of 31 October 2003)

The 4 main offences of bribery can be described as:

- a) bribing a person to induce or reward them to perform a relevant function improperly
- b) requesting, accepting or receiving a bribe as a reward for performing a relevant function improperly
- c) using a bribe to influence a foreign official to gain a business advantage
- d) a corporate offence of “failure to prevent bribery” by ‘persons associated’ with ACG

Examples of bribery are (but not limited to):

- a) Accepting or offering financial reward or another advantage, in return for business
- b) Accepting or offering gifts with to intent influence, corrupt or cause obligation
- c) Accepting or offering hospitality with intent to influence, corrupt or cause obligation

Gifts & Hospitality

With the exception of low value items such as a gift worth less than €35 or hospitality worth less than €50, employees must seek written permission from their Head of Department before accepting gifts or hospitality from potential or existing suppliers or their agents dealing with ACG. Under no circumstances must the receipt of gifts or hospitality influence the choice of supplier.

ACG Supplier Code of Ethical Conduct

Overview

The American College of Greece is committed to conducting its procurement business in an ethical, legal and socially responsible manner and expects its suppliers to share this commitment and, therefore, has established this **Supplier Code of Ethical Conduct**. All ACG suppliers must meet the following minimum requirements in order to do business with the University.

As an institution dedicated to the search for truth through teaching, scholarship, and research, The American College of Greece is committed to excellence and integrity in all its endeavors. In this way, ACG will maintain the trust and confidence of both the ACG community and the public. The ACG's reputation is one of its most valuable assets. Persons or entities that do business with ACG (hereinafter "a Supplier" or "Suppliers") are expected to carry out their business with the ACG with diligence and professionalism and to comply with the highest standards of honesty, integrity, and fairness. This includes, but is not limited to, being respectful of the rights of others and forthright in all dealings with members of the ACG community as well as third parties; protecting the privacy of confidential information; and compliance with all applicable laws, rules, and regulations.

PURPOSE

The University has upheld and will continue to uphold the highest levels of ethics and integrity in all its affairs. To this end, this Supplier Code of Ethical Conduct serves to emphasize the ACG's commitment to ethical conduct and compliance with the law and to set forth basic standards of ethical and legal behavior. Given the variety and complexity of ethical questions that may arise in the course of carrying out business with the institution, this Code can serve only as a general guide. Confronted with ethically ambiguous situations, a Supplier should keep in mind the ACG's commitment to the highest ethical standards and seek advice from appropriate sources so as to ensure that this commitment is honored at all times.

ETHICAL STANDARDS

Conflicts of Interest: Trustees, officers, and employees of The American College of Greece serve the public trust and are required to fulfill their responsibilities with care and loyalty and for the sole purpose of advancing the institution's best interests. The integrity of ACG must be protected at all times, and the fiduciary relationship of trustees, officers, employees to ACG must be honored in both actuality and appearance. A conflict of interest exists when a representative's direct or indirect personal interests are inconsistent with or interfere with the best interests of the institution. To avoid such conflicts, Suppliers shall disclose to the institution

- any direct or indirect personal interests in a Supplier held by any trustee, officer or employee of the institution
- any family relationship between a trustee, officer or employee of the University and any director, officer or employee of Supplier.

Fair Dealing: Suppliers are required to act honestly, in good faith, and with professionalism. No Supplier may take unfair advantage of another person through harassment, manipulation, abuse of privileged information, misrepresentation of material facts, or any other unfair practice. Stealing proprietary information, possessing trade secret information that was obtained without the owner's consent, or wrongfully inducing such disclosures by past or present employees of the institution or any other organization is prohibited.

Employment Standards: Suppliers will maintain fair and non-discriminatory work environments where all employees are treated with respect and dignity and in a manner that comports not only with workplace

practices mandated by the laws, but also with ACG's commitment to the highest ethical standards in all aspects of its educational mission and business practices, including employment.

Occupational Health and Safety Practices: All suppliers to The American College of Greece 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 The American College of Greece 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 and state contributions - Suppliers shall provide wages and pay state contributions 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 its employment practices on the basis of race, color, religion, sex, age, physical disability, national origin, 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.

Confidentiality: Suppliers must maintain the confidentiality of confidential information entrusted to them, except when disclosure is authorized by an appropriate officer of the institution or required by law. Confidential information includes all non-public information that might be of use to competitors or other third parties or harmful to the institution or its constituencies if disclosed; it also includes information that third parties have entrusted to the institution. The obligation to preserve confidential information continues even after a Supplier's business relationship with the institution ends.

Protection and Proper Use of ACG Assets: Suppliers should protect the ACG's assets and ensure their proper and efficient use. Theft, carelessness, and waste have a direct impact on the institution's operations. Any suspected incident of fraud or theft should be immediately reported for investigation. The obligation of Suppliers to protect the institution's assets includes, but is not limited to, its proprietary information. Proprietary information includes intellectual property such as patents, trademarks/logos and copyrights, as well as business plans, databases, records, employment information, and any unpublished financial data and reports. Unauthorized use or distribution of this information violates institution policy and may also be illegal and result in criminal and/or civil liability.

Compliance with Laws, Rules, and Regulations: Obeying the law, both in letter and in spirit, is the foundation on which the ACG's ethical standards are built. In conducting business with the institution, Suppliers must comply with applicable laws, rules, and regulations at all levels of government in the and in any other jurisdiction in which Supplier does business.

Environmental Practices: All suppliers to The American College of Greece shall comply with all environmental laws and regulations applicable to their operations worldwide. 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

Timely and Truthful Reporting: Suppliers involved in the preparation of financial, sales or payment reports and documents (and information included therein) submitted to ACG and/or filed with state, and local authorities in connection with a Supplier's relationship with the institution are required to make disclosures that are full, fair, accurate, timely, and understandable. They may not knowingly conceal or falsify information, misrepresent material facts, or omit material facts necessary to avoid misleading the authorities or the institution. The same standards apply to other public communications made by the Supplier which reference The American College of Greece.

Unauthorized Solicitations: All suppliers to The American College of Greece must comply with all guidelines issued by the institution relating to access its facilities, offices, departments, and employees. No Supplier shall use the ACG's computer system, including its electronic mail system and internet site, for the purpose of sending unsolicited electronic mail messages to the ACG community. Suppliers are not permitted to use the ACG's intramural mail system for unauthorized solicitation to employees. Suppliers must receive prior written authorization from the institution's Procurement Office to hold on-campus trade shows, exhibits, or product demonstrations.

Monitoring and Compliance: All suppliers to The American College of Greece must conduct audits and inspections to insure their compliance with this Supplier Code of Conduct and applicable legal requirements. If a supplier identifies areas of non-compliance, the supplier agrees to notify the Purchasing Services Department as to its plans to remedy any such non-compliance. The institution or its representatives may engage in monitoring activities to confirm Supplier's compliance to this Supplier Code of Conduct, including on-site inspections of facilities, use of questionnaires, review of publicly available information, or other measures necessary to assess supplier's performance. Any ACG supplier or institution employee that becomes aware of violations of this policy is obligated to notify the Purchasing Services Department. Based on the assessment of information made available to the institution, ACG 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 institution.

GLOSSARY

1. *Certification*: Official document or seal providing evidence and details of something that is authentic and verified by a third party.
2. *Environmentally Preferable Products*: Products having a lesser impact on human health and the environment. Consider raw materials acquisition, production, manufacturing, packaging, distribution, reuse, operation, maintenance, and/or disposal when choosing a product.
3. *Extended Producer Responsibility (EPR)*: Suppliers taking responsibility for the environmental impacts of their products life cycle; especially the take-back, recycle, and disposal.
4. *Green Purchasing*: Giving preference to environmentally friendlier products when quality and price are equivalent.
5. *Greenwashing*: Disinformation disseminated by an organization so as to present an environmentally responsible public image.
6. *Greenguard*: Certification is part of UL Environment, a business unit of UL (Underwriters Laboratories). GREENGUARD Certification helps manufacturers create--and help buyers identify--interior products and materials that have low chemical emissions, improving the quality of the air in which the products are used.
7. *Green Seal*: Customers want an easy and trustworthy way to identify goods and services that are healthier and greener. Green Seal has made that possible by offering shoppers the assurance of a neutral, unbiased review of green products and services. When you see the Green Seal mark, you know you're getting something truly green that's better for your health and the health of the environment.
8. *Life Cycle Cost Analysis*: The economic evaluation technique that determines the total cost of owning and operating equipment or a building.
9. *Life Cycle Evaluation*: Evaluation of the major environmental impacts in each life-cycle stage of a product category including resource extraction, production, distribution, use, and eventual disposal or recycling. The evaluation considers energy, resource use, and emissions to air, water, and land, as well as other environmental and health impacts.
10. *Rechargeable*: To replenish the amount of electric power in something, especially a battery.
11. *Recycle*: To reprocess and reuse used material.
12. *Recycled Products*: Manufactured with waste material that has been recovered or diverted from solid waste. Recycled material may be derived from post-consumer waste, industrial scrap, manufacturing waste, or other waste that would otherwise ended up in a land fill.
13. *Sustainability*: Meeting today's needs without compromising the ability of future generations to satisfy their needs.
14. *Scientific Certification System*: As a global leader in independent certification and verification of environmental and sustainable stewardship, SCS has developed internationally recognized standards and certification programs in pursuit of the highest level of environmental performance and social accountability
15. *Waste Prevention*: Eliminate or reduce the amount or toxicity of materials before they enter the waste stream.