

SUPPLIER CODE OF BUSINESS CONDUCT

1.0 Purpose

Multnomah County is committed to the highest standards of ethical and legal behavior and to the stewardship of taxpayer resources. We are governed by the highest ideals of honor and integrity in all public and personal relationships in order to merit the respect and inspire the confidence of the organization and public being served. We expect our contractors, consultants, suppliers, and vendors (collectively, "Suppliers") to share this commitment.

This Code of Conduct contains principles and conduct standards that Suppliers as well as their employees must adhere to as they provide goods and services to the County.

2.0 Supplier Responsibility

Suppliers are responsible for ensuring:

1. This Code is shared with all individuals assigned to perform work on behalf of the County.
2. Any work performed for the County is done in full compliance with this code, all applicable laws, regulations, and in accordance with the highest standards of ethical business conduct, and
3. Any work performed for the County is done by trained individuals with the skills, expertise and certifications necessary to complete the job in a safe and compliant manner.

3.0 Principles and Standards of Ethical Supplier Conduct

Multnomah County expects its Suppliers to follow Principles and Standards of Ethical Supplier Conduct.

1. **Compliance with Laws and Regulations.** Obeying the law, both in letter and in spirit, is the foundation on which the County's ethical standards are built. Suppliers must comply with applicable laws, rules, and regulations at all levels of government in the United States and in any other jurisdiction in which the Supplier does business.
2. **Conflicts of Interest.** Ensure that any personal, business, or other activity does not conflict with the lawful interests of your employer.

Multnomah County and employees of the County serve the public trust and are required to fulfill their responsibilities with care and loyalty and for the sole purpose of advancing the County's best interests. The integrity of the County must be protected at all times, and the fiduciary relationships of the employees of the County must be honorable in both actuality and appearance.

A conflict of interest exists when a supplier representative's direct or indirect financial interests are inconsistent with or interfere with the best interests of the County. Any supplier of Multnomah County must ensure there is no appearance or perception of unethical behavior by its employees in its dealings with the County.

To avoid potential conflicts, Suppliers shall disclose to the County any direct or indirect financial interests in a Supplier held by any employee of the County if known.

3. **Confidentiality.** Suppliers must maintain the confidentiality of proprietary information entrusted to them. Confidential information includes all non-public information that might be of use to competitors or other third parties harmful to the County or the County's interests if disclosed. The obligation to preserve confidential information continues even after a Supplier's formal business relationship with the County ends.

Confidentiality and HIPAA¹. Health care information is personal and sensitive information, and is protected by law. Supplier is obligated to maintain this information in a safe, secure and confidential manner. Unauthorized re-disclosure or failure to maintain confidentiality is a serious matter and could subject you or your employees to penalties described in federal and state law.

4. **Protection and Proper Use of County Assets.** Suppliers should protect the County's assets and ensure their proper and efficient use. Theft, carelessness, and waste have a direct harmful impact on the County's operations. The obligation of Suppliers to protect the County's assets includes, but is not limited to; its proprietary information, including intellectual property 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 County policy and may also be illegal and result in criminal and/or civil liability.

The County retains the right to monitor its assets and work environments in compliance with applicable federal, state, and local law. There should be no expectation of privacy when using Multnomah County work space, computers, voicemail, or systems to create, access, transmit, or store information.

5. **Timely and Truthful Reporting.** Suppliers involved in the preparation of financial, sales, payment documents, performance metrics, and other documents submitted to or filed with the County, federal, state or other local authorities 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 County.
6. **Sustainability and Social Responsibility.** Multnomah County recognizes that the products and services it purchases have inherent social, human health, environmental and economic impacts. Our vendors are an integral part of the societies and communities in which they operate. Their influence extends to the employees they depend upon, the environment from which they draw their resources and the marketplace in which they participate. Multnomah County seeks to conduct business with vendors who demonstrate responsible business practices through sustainability and social equity innovations. The County seeks to do business with Suppliers who demonstrate community and environmental stewardship and who:

- a. Commit to utilizing sustainable business practices.
- b. Commit to providing goods and services in a sustainable manner.

¹ Health Insurance Portability and Accountability Act of 1996. See www.hhs.gov/ocr/privacy/hipaa/understanding/index.html.

- c. Seek to do business with sub-suppliers, sub-contractors, and consultants that are committed to doing business in a sustainable manner.
 - d. Seek to do business with Minority-owned, Women-owned, and Emerging Small Businesses (MWESBs) sub-suppliers, sub-contractors, and consultants.
 - e. Make efforts to employ a diverse workforce.
7. **Harassment and Discrimination.** Multnomah County is committed to maintaining a work environment that respects individual differences. The County expects its Suppliers to conduct themselves in a professional manner and to treat others with respect, fairness, and dignity. The County does not tolerate harassment or discrimination, including behavior, comments, jokes, slurs, e-mail messages, pictures, photographs, or other conduct that contributes to an intimidating or offensive environment. This includes conduct in the form of bullying, workplace hazing, or other activities that can be humiliating or degrading.

Supplier shall comply with applicable federal, state, and local statutes prohibiting discrimination including harassment based on race, color, religion, age, sex, pregnancy, physical or mental disability, national origin, ancestry, medical condition, veteran status, marital status, sexual orientation, gender identity, genetic information, or any other non-job-related factor.

8. **Gifts and Gratuities and Reciprocity.** Accepting or giving a gift in a business setting can create a sense of obligation or the appearance of an obligation. Multnomah County strongly discourages and state law limits County employees from accepting gifts. Gifts can be anything of value, including tickets to sporting or other events, meals, discounts, trips, goods, loans, or payments.

4.0 Raising Concerns. These standards of conduct are critical to the ongoing success of Multnomah County's relationship with its Suppliers. If you encounter questionable activities, we encourage you to send your feedback to the Multnomah County Purchasing Manager at brian.r.smith@multco.us, or report to the Multnomah County Auditor's [Good Government Hotline](#). Reports can be made to the hotline confidentially through a web-based reporting system or by speaking to a trained professional over the telephone at 1.888.299.5460. The County contracts with a vendor, EthicsPoint, which specializes in hotlines of this nature.

This Code of Conduct is not a contract. It does not confer rights on any Supplier, nor does it impose obligations on Multnomah County. In case of conflict between the Code of Conduct and your Contract, the terms of your Contract prevail.