

UNIVERSITY OF KING'S COLLEGE



Guide to Financial
Management



Purchasing & Payments to
Suppliers

Date Issued:
December 1st, 2016
Next Review:
5 years from issue

Issued by: Approved by:
Bursar's Office Board of Governors

PURCHASING POLICY

1. INTRODUCTION

As a public institution, the University of King's College (the University) has a fiduciary responsibility to act in a fair and transparent manner in such a way that provides the highest degree of value to the University. University purchasing activities must be conducted in accordance with this responsibility.

This document is designed to facilitate an understanding of the University's purchasing policy and procedures (the policy). Purchasing in accordance with this policy is the responsibility of the acquiring department acting under the direction of the Procure-to-Pay Officer and the authority of the Bursar. This policy has been developed to ensure that University funds are responsibly managed and used effectively and economically. This policy describes the purchasing authority and responsibilities for purchasing within the University along with the processes for the acquisition of goods and services.

The University is classified as a public sector entity by the Province of Nova Scotia; it is guided by the terms and conditions set forth in the Atlantic Procurement Agreement and the Nova Scotia *Public Procurement Act*. These documents were developed to eliminate all forms of discrimination among public entities within the participating jurisdiction by providing details of public bidding requirements. The University will adhere to the principals of transparency, accountability, managing risk and standardizing practices to ensure taxpayers are getting the best value for their dollars and suppliers are getting every chance to compete in a fair and equitable manner.

2. PURPOSE

Since the purchase of goods and services is second only to salaries in University expenditures, it is imperative that the University community continually strives for lower costs and best value in every area of the University's operations. Purchasing is a vital activity with a goal of acquiring goods or services for the University in such a manner as to

maximize the value to the University community with respect to price, quality, service availability, sustainability and operational performance. This Policy is intended to provide the foundation and guidance for meeting these objectives.

It is the objective of the University to expend funds for the purchase of goods and services in such a manner as to obtain the maximum possible value for each dollar disbursed subject to the terms and conditions made by grantors, government agencies and sound procurement practices. As a general rule, business will be placed with those suppliers offering the most favorable combination of quality, service and price. To achieve these objectives the responsibilities, authorities, controls and procedures set forth in this policy must be adhered to and respected by all employees of the University.

3. SCOPE

This Policy is intended to cover the purchase of all goods and services on behalf of the University including but not limited to academic departments, administrative departments, capital and restricted funds, and research grants. Some purchases may not require a PO for reasons such as materiality, timelines or special circumstances. Exceptions will be decided on a case by case basis by the Bursar's Office and will need to be documented.

It is important to note that the University does not have a central purchasing department and, as such, purchasing activities are decentralized. The department that administers a budget and will be making purchases on behalf of the department within the approved budget shall be referred to herein as the Acquiring Department. All employees of the University involved with purchasing have a responsibility to become familiar with the authorities and procedures set forth in this policy and abide by them. Any difficulties encountered with suppliers that cannot be resolved satisfactorily by the acquiring department should be brought to the attention of the Procure-to-Pay Officer and/or the Bursar.

4. DEPARTMENTAL RESPONSIBILITIES

Each acquiring department has the responsibility for the procurement, within its allotted budget, of all of its goods and services. With the guidance of the Procure-to-Pay Officer, the acquiring department assumes the responsibility for ensuring that pricing and quality considerations are reasonable and are in the best interests of the University. The Bursar's office and each department is responsible for maintaining effective professional relationships with suppliers.

Each department is expected to purchase from the approved ISI (Interuniversity Services Inc.), CAUBO (Canadian Association of University Business Officers) and Provincial standing offer supplier lists unless it can be clearly demonstrated that better pricing with equal quality/service can be secured with an alternate supplier. Refer to section 7 of this policy for more details. New suppliers require approval from the Bursar's Office before purchases are made.

Legal documents or contracts requiring the signature of a signing officer of the University must in all cases be referred to the Bursar.

5. PURCHASING PROCEDURES

a. Purchase Orders (POs)

All University purchases, that are not payroll related, at the University require an approved PO. POs are central to the purchasing, invoice and payment process for all non-compensation-related expenses at the University. The purpose of a PO is to authorize a purchase in advance of the expenditure being made and to ensure pricing commitments made by suppliers are kept. It indicates to the Bursar's Office that the expenditure was approved so that the invoice can be paid. The purchasing process begins within an acquiring department identifying a need, considering alternatives which can satisfy the need and selecting the best alternative.

Depending on the dollar value and nature of the purchase, in consultation with the Procure-to-Pay Officer, the acquiring department will need to select a purchasing path (refer to section 7). The purchasing path determines the level of involvement of the acquiring department and the Bursar's Office.

At the completion of the purchasing process an electronic purchase requisition is completed which is the first step in creating a PO. (See attached form) with the approval of the appropriate acquiring department individual holding the required level of signing authority (i.e., budget manager). Goods and/or services are not to be delivered until a PO is approved and sent to the selected supplier and the acquiring department.

The University accepts no responsibility for the payment of invoices resulting from unauthorized purchase commitments. A contract does not exist between the University and a supplier until an official PO has been issued and accepted. If a quotation has been received from a supplier, a contract only exists when the purchase order is issued in accordance with the terms of the quotation. The Bursar's Office reserves the right to withhold payment to a supplier where a PO has not been issued to the supplier in advance of receiving the goods or services.

b. Cancellation, Modification, Overspending of Purchase Orders

POs can be cancelled or amended by the budget manager after they have been issued so long as the total value of the PO has not been exceeded. When the total dollar value of invoices received on a PO exceed the total dollar value of the PO by 10% additional approval is required by the Bursar in order to issue payment.

c. Payment Processing

Invoices will be processed biweekly for payment. All completed and signed documentation for payment (POs, invoices, cheque requisitions, confirmation of receipt of goods and services, etc.) must be submitted to the Bursar's Office three working days prior to the deadline (as set by the Procure-to-Pay Officer) so that payment can be issued in a timely manner. All supplier invoicing should be directed to the Bursar's Office and addressed to the University of King's College or electronically to accountspayable@ukings.ca in order to ensure timely payment.

d. University Procurement Cards

The distribution of University procurement cards (p-cards) is limited to those employees who do the majority of purchasing for a department or those individuals who travel on University business frequently. P-cards are only to be used for University-related expenses. Liability for payment of charges on University p-cards rests with the University. The cardholder is not personally liable for any charges providing the card has been used in accordance with this policy.

The issuance of new p-cards is performed by the Procure-to-Pay Officer in the Bursar's Office with authorization from the Bursar. Credit limits, transaction limits and temporary credit limit increases are all handled by the Procure-to-Pay Officer with authorization from the Bursar and are dealt with on a case by case basis. Any credit limit increases must be approved by the Bursar's Office for a one time purchase.

All original itemized receipts for p-cards must be submitted to the Bursar's Office on a monthly basis by the 14th of the month for reconciliation and processing. Summarized p-card slips are not acceptable. Any missing receipts will be deemed to be a personal expense and will be deducted from the employee's pay the following month. If original receipts are not received on a recurring basis the Bursar's Office may suspend the p-card.

e. Travel Expense Claims

University p-cards should be used where possible for travel expenses with the exception of meals (if per diems are being claimed) and gas (if mileage is being claimed). If meals are requested to be reimbursed based on receipt rather than on per diem, the maximum amount that will be reimbursed is the per diem amount as defined by the Travel Policy. For employee reimbursement of travel expenses not charged to p-cards, the process for out-of-pocket expenses should be used and a claim submitted. Refer to Employee Reimbursements below for the Out-of-Pocket process. For more details on allowable travel expenses and limits please refer to the Travel Policy and Hospitality Policy (currently in development).

f. Cheque Requisitions

Cheque requisition forms are to be completed for such expenditures as non-employee reimbursements, petty cash replenishments (refer to [Petty Cash Policy](#)), supplier pre-payments, student account refunds, non-PO purchases (i.e., when no invoice is available - such as licences, registration fees and building permits) and non-employee honoraria (employee and student honoraria already in the payroll system are paid through payroll – see below). There are three types of cheque requisition forms: [regular](#), [Canadian honorarium](#) and [non-resident honorarium](#).

Cheque requisitions should be completed in full and signed by the budget manager and sent to the Procure-to-Pay Officer along with original itemized receipts. Summarized credit card slips are not acceptable. For all honoraria payments, supporting documentation must include an invoice copy, original detailed receipts and payee details including a valid social insurance number and address. A cheque cannot be issued until this information is received by the Procure-to-Pay Officer. A T4A will be issued to the individual in February.

g. Employee Reimbursements

To reimburse employees for out-of-pocket expenses incurred on behalf of the University, the request is to be processed through Out-of-Pocket in the Centresuite system. All receipts should include appropriate details and an explanation where applicable. Expense reimbursements must be approved by the budget manager in the department for which the expenses will be charged. Reimbursements will be direct-deposited into the employee's bank account.

h. Petty Cash

To save costs related to cheque generation, petty cash should be used for small dollar purchases (\$50.00 and under) for which a University p-card could not be used. For replenishment of petty cash funds, a completed Cheque Requisition along with supporting receipts/vouchers and a Petty Cash Count Sheet should be forwarded to the Procure-to-Pay Officer in the Bursar's Office for reimbursement. Departments require the approval of the Procure-to-Pay Officer to establish a petty cash fund. Refer to the [Petty Cash Policy](#) for details.

i. Foreign Currency Drafts

Foreign currency drafts are processed by the Procure-to-Pay Officer for all amounts to be paid in a currency other than Canadian funds. Reimbursements, honoraria or invoices to be paid in a foreign currency should be clearly marked as such and accompanied by the backup documentation that supports the payment amounts and the reason for payment. The currency conversion will be performed by the Procure-to-Pay Officer using the exchange rate in effect on the date the draft is requested.

j. Returns for Credit

All employees must notify the Procure-to-Pay Officer when items are returned for credit. A return authorization (RA) number should be obtained from the supplier and forwarded to the Procure-to-Pay Officer so he/she is aware that a credit note is forthcoming in order to ensure proper payment processing.

k. Honoraria for Employees and Students Already in the Payroll System

Honoraria for employees and current students already in the payroll system will be paid through payroll. Details regarding honorarium amounts and recipients are to be sent to the Human Resources and Compensation Officer by an authorized individual. Amounts will be paid in the next payroll processing period. Honoraria payments are taxable and the amount will be included on the recipient's T4 at the end of the tax year. Payments to current students for employment-related services shall be via the payroll process only. Under no circumstances shall payments be made in cash.

l. Ownership of Assets and Inventory

All assets (including but not limited to furniture, equipment, mobile devices, computer hardware and software, library books, supplies) purchased with University funds (operating, capital, grant, research or donor funds) are owned by the University. The University is responsible under research grants, contracts and agreements for the custody of equipment purchased from the funds provided. For more information please refer to the [Research Equipment Policy](#).

All University employees must ensure that assets in his or her custody are well maintained and safeguarded and may be responsible for any loss or damage due to willful negligence.

m. Disposal of Surplus Furniture, Equipment and Supplies

Surplus and obsolete assets are the property of the University. All sales/disposals of University assets must be coordinated through the Bursar's Office to ensure proper record maintenance and excise tax treatment.

n. Purchasing From Employees

Purchases of goods or services from employees or from those which have a personal interest with a University employee cannot be made without prior written consent from the Bursar. Also refer to the [Policy on Conflict of Interest](#) for further details.

o. Purchasing For Students

No Academic, Administrative, or Research Department may sell goods and/or services directly to students unless the process is reviewed by the Bursar's Office for the collection and receipt of cash. [The Cash Handling Policy](#) should be followed to ensure the proper handling and safeguarding of cash and equivalents. Materials, software licences, equipment and/or services are purchased for the exclusive use of University staff both in the administrative and faculty areas. Many of these goods and services have specific tax implications for the University because they are used directly and predominately in teaching or research. As a condition of these tax regulations, goods may not be resold or rented without first assessing the tax implications.

p. Visitors Expenses

The Travel and Hospitality Policy should be followed for all expenses related to hosting a guest of the University.

q. Purchasing Using Research Grants

The awarding documentation of University research grants generally states that any materials, computer and phone hardware and software, equipment and supplies that are purchased by the recipient of the grant are to become the property of the University. As such, research grant holders are to follow normal purchasing and requisitioning procedures within this policy in the purchase of their goods and services. Please refer to the [Research Equipment Policy](#) for more information.

r. Gift Cards

University funds should not be used for the purchase of gift cards unless approved in advance by the Bursar's Office. A gift card is deemed taxable income to the recipient and a T4A will be issued.

s. Personal funds

Employees should not use personal funds to purchase goods and/or services for the University. There are tax implications and all goods and services need to be paid directly to the supplier.

t. Payments to Contract Workers

All payments to contract workers/employees must be made directly by the University for T4/T4A purposes. If University employees pay contract workers out of their personal funds they will not receive reimbursement from the University.

u. Standardization of Supplies, Materials and Equipment

Standardization of all supplies, materials and equipment is to be achieved whenever possible. A University-wide effort to support and fill consolidated requirements in standard commodities (i.e., stationery, computer equipment, etc.) allows the economical purchase of materials and supplies on a University-wide basis and therefore assists in optimizing cost reductions. It is University policy to achieve standardization of supplies, materials and equipment. The Bursar's Office will establish a preferred supplier list for specific goods (paper, stationery, courier, etc.). Authorization is required from the Bursar's Office to purchase standard materials from a supplier that is not on the preferred list.

v. Purchase of Hazardous Materials

This component of the policy applies to all purchases classified as hazardous materials under the federal government legislation known as the Workplace Hazardous Materials Information System (WHMIS). In accordance with WHMIS, all purchases of hazardous materials require Safety Data Sheets (SDSs) to be supplied from the manufacturer. Proper instructions for hazardous material usage must be made available to University staff and students using the product. All disposals of hazardous materials should be coordinated with the Director of Facilities and the acquiring department is responsible for expenses related to the removal of any hazardous materials following their purchase. It is the responsibility of individual faculty and staff to ensure that the requirements of the policy are met.

6. SIGNING AUTHORITY

Expenditures are to be properly authorized and within the limitations of the acquiring department's budget. In addition to the authorizations outlined below, expenditures are also subject to budget availability.

- a. Expenditures under \$5,000 may be authorized by an appointed by a Department Head and/or Designate. The designated individual should be accountable for the budget in addition to the department head.
- b. Expenditures greater than \$5,000 but less than \$20,000 require the authorization of the Bursar or the Director of Finance (or one of the other signing officers if unavailable – see below) in addition to the budget manager of the acquiring department.
- c. Expenditures in excess of \$20,000 require the authorization of two signing Officers (Chair of Board of Governors, Treasurer of Board of Governors, President, Vice President, Bursar, or Director of Finance). This is in addition the signature of the Department head.

In addition to the authorizations noted above:

- d. Expenditures of research grants are to be authorized by the Principal Investigator (PI) (research grant holder) or their designate. Please refer to the [Spending Authority for Research Funds policy](#) for more information.
- e. Legal documents or contracts requiring the signature of a signing Officer of the University must in all cases be referred to the President or Bursar.
- f. Expenditures for University-paid mobile phones must be coordinated through the Procure-to-Pay Officer in the Bursar's Office and be authorized by the Bursar.
- g.

7. COMPETITIVE QUOTATIONS

The Bursar's Office, and/or the designate, is responsible for obtaining bids on all goods and/or services covered under this policy. Unless a specific exception has been preapproved by the Bursar, quotations should not be solicited from any company that is owned, controlled, or actively influenced by any University employee or immediate relative of an employee. Purchase transactions must comply with the requirements of the Nova Scotia procurement legislation and trade agreements. The anticipated value of goods or services will determine the procurement process. Please refer to the threshold grid table below for the appropriate method. Amounts shown are pre-tax.

Threshold	Under \$5,000* (Department Head*)	\$5,000 to \$9,999 (Department Head)	\$10,000 to \$24,999 (Bursar's Office)	\$25,000 to \$49,999 (Bursar's Office)	\$50,000 to \$99,999 (Bursar's Office)	\$100,000+ (Bursar's Office)
GOODS	One Written Quote or Standing Offer	Three Competitive Quotes or Standing Offer	Tender By Invitation (3 Bids) or Standing Offer	Public Tender (per <i>Public Procurement Act</i> (PPA))	Public Tender	Public Tender
SERVICES	One Written Quote or Standing Offer	Three Competitive Quotes or Standing Offer	Tender By Invitation (3 Bids) or Standing Offer	Tender By Invitation (3 Bids) or Standing Offer	Public Tender (per PPA)	Public Tender
CONSTRUCTION	One Written Quote or Standing Offer	Two Competitive Quotes or Standing Offer	Tender By Invitation (3 Bids) or Standing Offer	Tender By Invitation (3 Bids) or Standing Offer	Tender By Invitation (3 bids)	Public Tender (per PPA)

**could also be other designated individual that is responsible.*

When requesting pricing, departments are reminded to address the following issues as they apply to the order and include the information on the PO.

- Lead time for delivery

- Method of shipping
- FOB point (who pays the shipping)
- Insurance coverage while in transit
- Warranty (on site or off)
- Installation

a. Value of Purchase and Approvals

When assessing the threshold level to use in the chart for any purchases involving recurring payments over a contract period, leases or rental agreements, the department making the purchase should include the total of all payments over the life of a contract. For example, if a 3-year contract for a service is \$500/month for 36 months (pre-tax), the threshold to use (i.e., the value of the transaction) would be \$18,000. Any purchase, rental or leasing contracts require the pre-approval and signature of the Bursar. All extras to any ongoing contract shall be pre-approved by the Bursar. Splitting purchases over multiple transactions is not permitted to circumvent purchasing procedures or approvals. The University accepts no responsibility for the payment of invoices resulting from unauthorized purchase commitments.

b. Written Quotations

In situations where the value of the purchase is estimated to be less than \$5,000, a written quotation from the supplier is required. Quotations should include the price of the good or service, all taxes, freight charges, insurance and customs costs. A copy of the written quotation should be forwarded to the Procure-to-Pay Officer. If a department has contacted more than one source, the information should be sent to the Procure-to-Pay Officer to accompany the PO.

c. Standing Offers/University Group Purchasing

The University has access to consolidated agreements and standing offers put in place through a competitive process initiated by organizations such as ISI, CAUBO and the Province of Nova Scotia. These agreements are set up by a consortium of universities to consolidate their buying power and the negotiated standing offers generally reflect the lowest total end-use cost for members considering quality, service and price. For a current copy of the University's standing offer agreements please contact the Bursar's Office. All University purchasing should try to utilize these standing offers and preferred suppliers to obtain the best value when possible.

d. Competitive Quotations

Where the value of the transaction is estimated to be between \$5,000 and \$10,000, the purchase must be made on a competitive basis with an informal solicitation to at least three known suppliers of goods/services to confirm pricing, specifications and terms (see ethical practices section of this document). When obtaining quotations, discuss delivery options with the supplier as they may have an impact on the purchase price. Estimated costs must include the price of the goods/services, all taxes, freight and shipping charges, insurance, customs and other related costs. All

documentation must be forwarded to the Procure-to-Pay Officer in advance of generating a PO. The Procure-to-Pay Officer can provide guidance on the process and help to facilitate the blind quote process.

e. Tender By Invitation

Where the value of the transaction exceeds \$10,000 a tender must be issued. Tender by invitation enables the user department to limit the number of bids to known suppliers who are invited to participate. The University should aim for at least 3 quotes. If less than three quotes are obtained ISI should be solicited to provide an independent opinion on the process via email. The Department should always call the suppliers in advance to inquire about their willingness to quote. If they are unable to quote, they are asked to provide a letter for our files indicating why they are unable to quote.

f. Public Tenders

The *Public Procurement Act* mandates that all public sector entities must post notice of any tender over Atlantic Trade Agreement thresholds (goods \$25,000, services \$50,000, construction and facilities \$100,000) to the provincial tenders website. Public sector entities may choose to tender for goods, services, construction and facilities for amounts that are lower than the thresholds set out in the applicable trade agreements. Procurement requiring public tenders will be managed through the Procure-to-Pay Officer in the Bursar's Office in consultation with the acquiring department.

A public tender is a formal solicitation document inviting binding proposals for the delivery of goods, services and construction. In a tender, the requirements are clearly defined with price, work schedule and delivery representing some of the evaluation criteria. Public tenders should be coordinated through ISI and should be advertised on both the ISI and Government of Nova Scotia web portal. Suppliers' responses must be sealed and received before the specified date and time. The terms and conditions of every public tender notice must be consistent with the Atlantic Standard Terms and Conditions for the procurement of goods and services and Construction Contract Guidelines for the procurement of construction.

When evaluating a bid, the University shall obtain best value and is not limited solely to purchase price and life-cycle cost considerations, but may also consider environmental and social factors, delivery, servicing and capacity of the bidder to meet criteria as stated in the bid received.

All suppliers that submit a bid will be informed of the award results. The *Public Procurement Act* requires the name of the successful bidder and the contract amount be posted on the provincial web portal. At the request of a supplier who submitted a rejected bid, the University shall conduct for that supplier a debriefing session to provide feedback on the evaluation of the public tender. The debriefing shall provide reasons for disqualification and how to improve future submissions without disclosing any information regarding other bidders or their submissions.

g. Capital Building and Renovation Projects

It is the responsibility of the Campus Planning Committee of the Board of Governors to review proposals for capital building and renovation projects (>\$50,000) and to make recommendations on the implications to the Board and the Finance, Audit and Risk Committee. The Board approves the budget and funding for all capital building and renovation projects as well as the annual operating budget. For all capital building and renovation projects, the reporting to the Campus Planning Committee should include the following:

- A full outline of the scope at the outset of the project along with the final design and detailed budget. The budget should contain a sufficient and realistic contingency.
- Any significant changes to the scope and the associated budget implications.
- Any environmental health and safety issues associated with the project should be highlighted.

h. Contingency Requirement and Approval

All purchases large enough to require a public tender should include a 10-15% contingency. If at any time more than 50% of a contingency is expended it must be reported in writing to the Bursar. Spending of any contingency amount in a budget for a capital project shall require the approval of the Bursar.

i. Alternative Procurement Practice

Subject to the authority of the Bursar, there may be unforeseen situations of urgency where a good, service or construction requirement cannot be obtained by means of open procurement procedures. In this case the Bursar or the Director of Finance will review the proposed purchase and document the decision as to why a public procurement process cannot take place. For emergency situations related to campus facilities the Director of Facilities has the authority to proceed with the purchase of goods and or services required for the University as needed without going through an open procurement process.

j. Confidentiality

All employees should endeavour to protect the confidentiality of pricing and other competitive information of the suppliers (see ethical practices section of this document). Any requests to reveal information, including those of a public tender, must be referred to the Bursar.

k. Audit

All procurement activities are subject to regular audit procedures and possible Freedom of Information and Protection of Privacy (FOIPOP) requests. All official documentation will be maintained by the Bursar's Office for any public tenders. Competitive quotation documentation should be submitted to the Bursar's Office for record keeping once the process is complete.

8. ETHICAL PRACTICES

The purchase of goods and services using accounts managed by the University, including research grants and contracts, will be made using fair, transparent and equitable procurement practices. It is the responsibility of all employees to maintain the reputation of the University, to keep good relations between the University and its suppliers and to keep in mind that personal contacts can form much of the basis of the supplier's opinion of the University. Any persons who make, influence or approve purchasing transactions should therefore operate under the following guidelines:

a. General Guidelines

- Equal opportunity is afforded to all suppliers through clear specifications and scope and open competition. Business will be awarded without favoritism. The scope of larger scale purchases shall not be divided into smaller scale purchases as to favor a particular supplier or to preclude the purchase from being subject to the public tendering process.
- All terms, prices and conditions of a quotation, order or agreement must remain confidential; employees must not engage in price disclosure for the purpose of increasing competition.
- Quotations should not be requested from companies who do not receive fair consideration.
- Advantage should not be taken when it is clear an error has been made by a supplier.
- Obligations should not be made beyond those which form part of the transaction.

For more information please refer to the following University policies:

- [Research Equipment Policy](#)
- [Research Ethics Policy](#)
- [Policy on Conflict of Interest](#)

b. Gifts and Gratuities

Employees should not accept gifts, entertainment or any form of special consideration (valued in excess of \$50 from one source during a fiscal year) from individuals or entities that can result in a conflict of interest (where the party providing the gift/entertainment/special consideration does so under circumstances where it might be inferred that such action was intended to influence or possibly would influence the employee in the performance of their duties). The recipient might be deemed by others to have been influenced in making a business decision as a consequence of receiving such gifts or gratuities. University employees may not accept cash, discounts, kickbacks, preferential treatment, gift certificates, excessive entertainment and gifts or loans on preferential terms. Any employee who is offered or receives such a gift or gratuity should refuse it and return it to the giver in a tactful way advising the giver of the University's position prohibiting its acceptance. The Code of Ethics of the Purchasing Management Association of Canada and its Institutes shall be the guide for all employees regarding the acceptance of gifts and

gratuities. Appropriate disciplinary action may have to be taken against an employee who disregards the intent of this policy. For more information please refer to the [University Code of Conduct \(yellow book\)](#).

c. Conflicts of Interest

It is the policy of the University to not purchase any material, equipment or service from a University employee, an employee-owned business venture or from those with whom the employee has personal interest. Any employees who make, influence or approve purchasing transactions should avoid conflict of interest situations or the appearance of conflicts of interest since they can be potentially detrimental to the best interest of the University. Any employee influencing purchasing decisions who feels a conflict of interest may exist, must inform the Bursar of the circumstances involved so that a decision can be made as to whether a conflict of interest is present and, if so, what course of action should be followed. Some examples of potential conflicts of interest include:

- Entering into or involvement in a purchasing or tendering process, contractual arrangement or transaction on behalf of the University with a company, individual or firm in which the employee or a member of his/her family or an individual with whom there exists or has existed within a previous five-year period, a personal interest.
- Advocating or lobbying for goods or services of a firm where one has a personal interest.
- Influencing the purchase of equipment, goods or services for the University with a company, individual or firm in which the employee, a family/personal associate or a person with whom there exists or has existed within a previous five-year period, a personal interest.
- Seeking a discount on goods/services for personal use on the basis of having been granted past University business to the supplier involved or of being able to secure future University business for the supplier involved.
- Taking undue personal advantage of material or property that belongs to the University. Personal advantage refers to any interests that involve potential gain for an employee or for any other individual or organization they may wish to benefit. This includes the personal, financial, intimate or other interest of the employee and/or their family/personal associates.

d. Reciprocity

It is recognized that the University must actively solicit donated funds throughout the community and this is an important source of revenue for the University; however, reciprocity will not be a condition of purchase for the University. Reciprocal arrangements can only work to the detriment of the University and weaken the University's leverage in negotiating with a supplier to obtain the lowest total cost.

e. Legal Jurisdiction

All contractual documents concerning the purchase of goods and services must conform to legal requirements as to point of delivery, price and description of material and terms of acceptance. Any questions concerning the legality of a pending purchase should be referred to the Bursar at the earliest opportunity.

f. Confidentiality and Accuracy of Information

The majority of transactions related to purchasing are of a confidential nature and should be treated as such especially regarding the University's suppliers. It is considered unethical as well as damaging to the University's reputation to allow information from one supplier's quotation to be shared directly or indirectly with another supplier.

Information given in the course of any purchasing activity must be true and fair and not intended to mislead or misrepresent.

All information held (or acquired indirectly) by a University employee in the course of his/her involvement in purchasing activities is to be treated as confidential information and cannot be disclosed to any other supplier or to any other person including University employees who are not authorized to have access to that information.