# Vendor Code of Conduct

Policy

# Introduction

Cancer Care Ontario (“CCO”) holds itself as an organization to the highest ethical standards.  This notion is reinforced by CCO’s People Values:

* We are rooted in integrity
* We are driven by accountability
* We are empowered by our partnerships
* We are unified in our purpose

# Application

This Vendor Code of Conduct (“Code”) applies to all providers and potential providers of products, goods and/or services to CCO (each referred to as a “vendor” in this Code).

# Principles

3.1 Compliance with Applicable Laws and this Code

All vendors shall comply with all applicable laws and regulations, including all federal, provincial and local laws, and the requirements of this Code.

3.2 Gifts and Hospitality

CCO employees are subject to the *Public Service of Ontario Act, 2006* (“PSOA”). As such, CCO employees cannot generally accept gifts from vendors if a reasonable person might conclude that the gift could influence a CCO employee when performing his or her duties to CCO.

A “**gift**” is defined as a benefit of any kind. A gift could therefore include a lunch, dinner, gift baskets, or entertainment ticket for which a CCO employee does not pay.

Despite these restrictions, a CCO employee *may* accept a gift of nominal value (defined as not more than $50) and generally no more than 1-2 a year which is given as an expression of courtesy or hospitality if doing so is reasonable in the circumstances. Tickets or invitations to concerts, galas, or other similar events, or invitations to trade and industry-sponsored sporting events, such as golf, tennis, or hockey events, are not generally considered to be of nominal value.

In considering whether accepting the gift is reasonable in the circumstances, CCO employees should consider all of the circumstances relating to the gift and the vendor, group or entity who is giving it, including matters such as:

* + whether it could reasonably influence or appear to influence the employee’s judgement or the performance of their duties to CCO
  + whether CCO is in an active procurement with the vendor providing the gift
  + whether it creates or could create an obligation for the employee or for CCO
  + whether it would embarrass the employee or CCO if made public
  + the frequency of such gifts from the same source and from other sources

CCO expects its vendors to not place CCO employees in the difficult position of having to refuse gifts that would place them in conflict with the above rules.

3.3 Conflict of Interest

Under the PSOA, CCO employees are subject to conflict of interest rules requiring them to avoid situations involving an actual, apparent or potential conflict of interest. Generally a conflict of interest arises when an employee’s personal interest conflicts, appears to conflict, or could potentially conflict, in any way with the interests of CCO.

These rules prevent CCO employees from:

* using or attempting to use their position to directly or indirectly benefit them, their spouse, children, or family from CCO vendors;
* allowing the prospect of future employment with a vendor to affect the performance of their duties;
* giving preferential treatment to a vendor, or creating the appearance of giving preferential treatment, when performing their duties to CCO; and
* agreeing to (entering into) a contract with a vendor in which he or she or a member of their family has a substantial interest.

Vendors shall disclose any situation that could result in actual, apparent, or perceived conflict of interest on the part of a CCO employee.

3.4 Anti-Bribery and Anti-Corruption

Vendors are expected to comply with applicable anti-corruption laws, whether domestic or foreign (including, but not limited to, *Canada’s Corruption of Foreign Public Officials Act*) and not engage in any form of corrupt practices including extortion, fraud, or bribery.

# Penalties

CCO reserves the right to terminate any contract with a vendor found, in CCO’s sole discretion, to be in violation of this Code or the spirit of this Code and to bar them from engaging in any future work with CCO. CCO reserves the right to report any suspected illegal activity to the appropriate authorities.

1. **Reporting and addressing violations.**

Any person with reason to believe that the spirit or principles of this Code are not being respected is asked to report to:

CCO Ethics Executive

Office of the President and CEO

620 University Avenue, 16th Floor

Toronto, Ontario

M5G 2L7

Alternatively, anonymous reporting of violations of this Code can be reported to CCO’s Ethics Hotline Phone Number**: 1-866-725-0641.** Note that audio recordings of this line are not taken allowing reporting to take place in confidence.

Violations of this Code will be taken seriously and CCO will investigate alleged improper activities.