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1 Introduction

BCNET serves as a member-centric, not-for-profit, collaborative, shared services organization dedicated to the needs of B.C.'s higher education and research institutions. We offer a wide array of shared solutions in high-performance networking, information and educational technology, cybersecurity, and procurements that help members reduce costs, maximize efficiencies, enhance service quality, empower digital transformation and support their mission.

The Supplier Code of Conduct (SCC) establishes standards applicable to all BCNET suppliers that support its members. By promoting these standards and applying measures to ensure compliance, BCNET demonstrates its intention to do business with suppliers that conduct themselves in a manner that aligns with BCNET's core values.

BCNET recognizes that its suppliers must conduct their business according to their objectives, corporate values, local legislative framework, and that the attainment and upholding of responsible procurement standards constitute an ongoing long-term commitment. BCNET also expects all suppliers to take every measure to comply with the principles set out in the SCC and to adopt behaviors and practices that are in alignment with these principles or those of its members.

The SCC applies to BCNET suppliers, including their owners, employees, agents, partners and subcontractors who provide products and/or services to BCNET and our members.

The SCC does not create any binding obligation on BCNET and BCNET reserves the right to amend the SCC from time to time. The SCC can also be found at <https://www.bc.net/suppliers>.

2 BCNET Values

BCNET's values establish the framework for its practices and policies. BCNET has entrenched its values in daily operations and expects the same commitment from its suppliers when conducting business with its members.

The SCC is based on core values including:

Collaboration: We achieve more by working together

Responsiveness: We commit to service excellence

Innovation: We deliver creative solutions

3 Applicability of the Supplier Code of Conduct

The SCC applies to all BCNET suppliers delivering products and/or services to its members. All BCNET suppliers are expected to:

- Abide by the SCC;
- Report violations of the SCC or identify any customer requests that might constitute violations; and,
- Cooperate and collaborate with BCNET and bring about the resolution of SCC compliance issues.

The SCC is not to be read in lieu of, but in addition to, the supplier's obligations as set out in

any agreements between BCNET and/or its members and the supplier. In the event of a conflict between the SCC and the supplier's obligations as set out in any agreements between BCNET and/or its members and the supplier, the supplier's obligations as set out in those agreements will govern.

4 Key Principles of the Supplier Code of Conduct

BCNET's core values are in alignment with and entrenched within the key principles of the SCC.

BCNET expects suppliers to manage their operations according to the most stringent standards of ethical business, integrity and equity. BCNET suppliers must therefore:

- refrain from engaging in any form of non-competitive or corrupt practice, including collusion, unethical bidding practices, extortion, bribery and fraud;
- ensure that responsible business practices are used, including ensuring that business continuity and disaster recovery plans are developed, maintained and tested in accordance with applicable regulatory, contractual and service level requirements, and that healthy and safe workplaces that comply with relevant health and safety laws are provided;
- ensure the protection of the confidential and personal information they receive from BCNET, and only use this information as part of their business relations with BCNET;
- comply with intellectual property rights relating to the products and services they provide to BCNET and its members;
- never place a BCNET employee in a situation that could compromise his/her ethical behavior or integrity or create a conflict of interest;
- divulge all actual and potential conflicts of interest to BCNET; and
- disclose to BCNET any behavior deemed unethical on the part of a BCNET employee.

4.1 Compliance with Applicable Laws and Regulations

Suppliers must comply with all foreign and domestic applicable federal/provincial/municipal laws and regulations including, but not limited to the environment, health and safety, labour and employment, human rights and product safety and anti-corruption laws, trade agreements, conventions, standards, and guidelines, where the products and/or services are provided to BCNET members. Fair competition is to be practiced in accordance with applicable laws. All business activities and commercial decisions that restrict competition or may be deemed to be uncompetitive are to be avoided.

4.2 Conflicts of Interest

Suppliers must not try to gain improper advantage or engage in preferential treatment with BCNET employees and members. Suppliers must avoid situations that may adversely influence their business relationship with BCNET or can be directly or indirectly perceived as a conflict of interest and interfere with the provision of the products and/or services to BCNET or its members. The Supplier must disclose any actual or potential conflicts of interest within one (1) week to BCNET of identification.

4.3 Gifts and Entertainment

BCNET requires all suppliers to comply with applicable laws and regulations regarding bribery and corruption, including the **Corruption of Foreign Public Officials Act (CFPOA)**, the relevant sections of the **Criminal Code of Canada**, the **Public Interest Disclosure Act (PIDA)** in British Columbia, and international agreements such as the **United Nations Convention against Corruption (UNCAC)** and the **OECD Anti-Bribery Convention**. Suppliers must adopt comprehensive measures to prevent bribery and corruption, ensuring all business activities are conducted ethically and transparently.

Suppliers must never offer to BCNET staff, payments, gifts of entertainment or any type of

inducements, services, discounts and/or personal benefits that may compromise or appear to compromise an BCNET's employees' ability to make business decisions in the best interest of BCNET and its members. If a supplier is unsure whether a gift or entertainment offer to an BCNET employee complies with BCNET's SCC, the supplier should consult with the intended recipient's manager.

4.4 Anti-bribery and Anti-corruption

Suppliers must not engage in any improper conduct to gain influence or competitive advantage, especially that which would put BCNET or its members at risk of violating anti-bribery and/or anti-corruption laws. Suppliers must ensure that the requirements of all these applicable laws are met, and not engage in any form of corrupt practices including extortion, fraud or bribery.

4.5 Outsourcing and Subcontracting

Suppliers will ensure that any outsourcing and/or subcontracting services used to fulfill deliverables are identified and approved by members and monitored to ensure compliancy with contractual obligations and adherence to BCNET's SCC. Supplier's employees, subcontractors and other service providers must adhere to the requirements of the SCC, which must be made available as necessary. Suppliers must also ensure that their subcontractors and other service providers are paid properly and promptly to avoid any disruption in the provision of the products and/or services by the supplier to BCNET or its members.

4.6 Respect and Diversity

Suppliers must maintain workplace professionalism and respect for the dignity of all employees, members, and individuals. Suppliers must never exercise, tolerate or condone harassment, discrimination, violence, retaliation and any other inappropriate behavior.

4.7 Product Quality

Suppliers are expected to provide products that meet the highest standards of quality, ensuring longevity, performance, and reliability. We are committed to offering our members the best value through products that not only fulfill their intended purpose but also exceed industry standards in terms of durability and functionality. Suppliers should strive for continuous improvement and innovation, reflecting a commitment to excellence that aligns with our own. We encourage our suppliers to adopt best practices from leading companies, prioritizing product quality, safety, and sustainability throughout the entire product lifecycle.

4.8 Employment Practices

Suppliers must abide by applicable employment standards, labor, non-discrimination and human rights legislation. Where laws do not prohibit discrimination, or where they allow for differential treatment, the expectation of suppliers is to be committed to non-discrimination principles and not to operate in an unfair manner. Suppliers must be able to demonstrate that their workplaces operate under the following principles:

- Respect for the principles set forth in the Universal Declaration of Human Rights (UDHR) and in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP Child labor is not accepted);
- Ensure that exploitative practices, including forced and child labor, are not present in their supply chains. In alignment with the principles outlined in [bill/S-211](#), an Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act, we require our suppliers to promote transparency and take proactive steps to improve their practices, ensuring the well-being and fair treatment of all individuals involved in their operations.
- Suppliers must also ensure that all workers are paid a livable wage that meets or exceeds the local minimum wage standards and allows for a decent standard of living.

- Discrimination and harassment are prohibited, including discrimination or harassment based on any characteristic protected by law;
- Employees are free to raise concerns and speak up without fear of reprisal;
- Appropriate and reasonable background screenings, including investigations for prior criminal activity, have been completed to ensure integrity and character of the supplier's employees; and,
- Clear and uniformly applied employment standards are used that meet or exceed legal and regulatory requirements.

4.9 Health and Safety

Suppliers must provide healthy and safe workplaces for their employees. These workplaces must comply with applicable health and safety laws, statutes and regulations to ensure a safe and healthy work environment. Employers must also ensure their employees are properly trained and have easy access to information and instructions on health and safety practices.

4.10 Environmental

Suppliers must give high priority to environmental issues and implement initiatives to foster sound environmental management through practices that prevent pollution and preserve resources. Suppliers must conduct business in an environmentally responsible and sustainable manner. Suppliers must comply with all applicable environmental laws, statutes and regulations, including, but not limited to, waste disposal (proper handling of toxic and hazardous waste), air emissions and pollution, to ensure that they meet all legal requirements and strive to prevent or mitigate adverse effects on the environment with a long-term objective of continual improvement.

5. Supplier Compliance

Compliance with the principles contained in the SCC is a criterion that is taken into consideration in BCNET's supplier selection process and ongoing performance and relationship management.

Failure to comply with BCNET's SCC may result in termination of a supplier's contract with BCNET. In the event that a supplier chooses to include a subcontractor in order to deliver products and/or services, it is the supplier's responsibility to ensure that the subcontractor complies with BCNET's SCC.

The practices adopted by suppliers must be verifiable. Such verification may be conducted by way of a supplier's self-evaluation and/or an audit completed by BCNET at its discretion. Suppliers must be able to provide BCNET with documents attesting to their compliance with the SCC upon request. To ensure the optimal implementation of the SCC, BCNET also encourages suppliers to inform of the measures taken to enhance their corporate practices and share their suggestions on how BCNET can best contribute to the implementation of the principles set out in the SCC. BCNET expects to be informed by suppliers of any obstacles to the application of this SCC.

In addition, BCNET may elect to visit the suppliers' facilities. If BCNET so chooses, appropriate notice will be provided to the supplier. Whenever a situation of non-compliance is identified, BCNET will endeavor to work with the supplier in order to develop a corrective plan to resolve the non-compliance issue(s).