

## Appendix A

### Responsibilities of Purchasers and Conflict of Interest Standards

All individuals conducting purchasing activities on behalf of Harvard University **must** avoid conflicts of interest in their purchasing decisions, including but not limited to the following:

<ul style="list-style-type: none"><li>• Avoid the intent, appearance, and conduct of unethical or compromising practice in relationships, actions, and communications, including with affiliates or subsidiaries, or organizations that President and Fellows of Harvard College controls. For the most part, this does not include area hospitals and clinics with whom we work closely but are not part of Harvard. When transacting with an affiliate or subsidiary, you must abide by the same standards within this Appendix A.</li></ul>
<ul style="list-style-type: none"><li>• Demonstrate loyalty to Harvard University by diligently following the applicable laws, policies and procedures using reasonable care and only the authority granted as an agent purchasing on behalf of the University.</li></ul>
<ul style="list-style-type: none"><li>• Refrain from any private business or professional activity that would create a conflict between personal interests and the interests of Harvard University. A conflict of interest would arise when the employee, officer, or agent, any member of his or her immediate family, his or her partner, or an organization which employs or is about to employ any of the parties indicated herein, has a financial or other interest in or a tangible personal benefit from a firm considered for a contract.</li></ul>
<ul style="list-style-type: none"><li>• Avoid procuring goods or services from a vendor who participated in advising, developing or drafting the request for proposals or bidding criteria.</li></ul>
<ul style="list-style-type: none"><li>• Refrain from soliciting or accepting money, loans, credits, or prejudicial discounts; such as the acceptance of material gifts or entertainment, or any kind of favors or services from present or potential suppliers that might influence, or appear to influence procurement decisions.</li></ul>
<ul style="list-style-type: none"><li>• Handle information of a confidential or proprietary nature to Harvard University and/or suppliers with due care and proper consideration of ethical and legal ramifications and governmental regulations. Bids and quotes submitted to the University are to be held in strictest confidence. Under no circumstances may Harvard personnel give suppliers information about bids or quotes from competing sources.</li></ul>
<ul style="list-style-type: none"><li>• Promote positive supplier relationships through courtesy and impartiality in all phases of the procure-to-pay cycle.</li></ul>
<ul style="list-style-type: none"><li>• Do not use Harvard University procure-to-pay systems for personal purchases, or use Harvard University buying power for personal benefit.</li></ul>
<ul style="list-style-type: none"><li>• University funds must not be used for personal expenses and purchases that are not made on behalf of the University or for use by the University. Purchases must be for the use and benefit of Harvard University, regardless of intent to reimburse the University.</li></ul>
<ul style="list-style-type: none"><li>• If an individual believes that they may have a conflict of interest, the individual must promptly and fully disclose the conflict to their supervisor and suspend participation on the purchase until conflict question has been resolved. The supervisor is responsible for documenting the conflict and elevating it to the school Financial Dean's office or other office as appropriate. The supervisor in conjunction with other relevant offices will assess the conflict and determine if the purchaser can resume participation or if a management plan is needed. This section is not meant to replace or detract from the existing Harvard Faculty Financial Conflict of Interest Policies.</li></ul>

Violations of the above standards will be considered serious misconduct and will be referred to the appropriate office for disciplinary action.

See also: [Fraud Awareness and Reporting, Harvard University Policy on Conflicts of Interest and Commitment for Senior Officers and Administrators, Office for Academic and Research Integrity, University-wide Policy on Individual Financial Conflicts of Interest for Persons Holding Faculty and Teaching Appointments, Institutional Conflicts of Interest Policy](#)