

Supplier Code of Conduct

Introduction:

As an institution of scholarly learning and research committed to the exploration of diverse ideas and backgrounds, it is imperative that Northeastern University (“Northeastern”) conducts itself in a manner that promotes transparency, trust, and confidence with its students, faculty, staff, and broader community members. As such, Northeastern is committed to conducting its operations in an ethical, legal, and socially responsible manner. This Supplier Code of Conduct ("Code") outlines the expectations and standards Northeastern has for its valued suppliers and their subcontractors to ensure that their operations are conducted in a responsible and ethical manner.

Compliance with Laws and Regulations:

Suppliers must operate in full compliance with all university, local, state and federal equal opportunity and affirmative action rules and regulations.

Conflict of Interest:

Suppliers are required to adhere to Northeastern’s [Policy on Conflicts of Interest and Commitment](#). Key elements include:

- A. Disclosure: Suppliers must immediately disclose to Northeastern any situation that creates or has the appearance of creating a conflict of interest, particularly those that could compromise the impartiality, judgment, or loyalty to Northeastern. This includes, but is not limited to, personal relationships with Northeastern staff, faculty, or students who may have influence over the supplier relationship or any financial interest in Northeastern 's operations.
- B. Business Dealings: Suppliers should avoid any actions, positions, or relationships that could create or appear to create a conflict between personal interests and the interests of the Northeastern. Any business interactions should be transparent, at arm’s length, and free from perceptions of favoritism or bias.
- C. Gifts and Entertainment: Suppliers must not offer, provide, or accept gifts, hospitality, or entertainment that could be perceived to influence a business decision, the outcome of a tender process, or to gain an unfair advantage. Any gifts or entertainment provided or received must be modest in value (no single gift or annual cumulative gift(s) valued over \$100), infrequent, and not violate any laws or regulations.
- D. Transparency: In cases where a potential conflict of interest is identified, it is the supplier's responsibility to be transparent and proactive in addressing the issue, cooperating fully with Northeastern’s directives to remedy the situation.

Diversity, Equity, and Inclusion:

Northeastern has made a strong commitment to proactively address issues related to systemic racism within its ecosystem, including increasing engagement with certified diverse, local, and/or historically marginalized community businesses through its Supplier Diversity program. In addition, Northeastern

has guidelines for inclusive language, including communication with suppliers. Many of our suppliers have their own suppliers or work with subcontractors. As a supplier, it is crucial to recognize how inclusive language demonstrates your commitment to fostering a diverse and inclusive environment. Here are some guidelines for using inclusive language:

- A. **Use gender-neutral language:** Whenever possible, avoid gender-specific terms. Instead of using "he" or "she," use gender-neutral pronouns such as "they" or rewrite the sentence to be gender-neutral. Many job titles historically implied gender bias. Use gender-neutral terms when referring to professions or job titles.
- B. **Respect individuals' self-identifications:** Use people's preferred names and pronouns. If someone identifies with specific pronouns like "they/them", or other alternative pronouns, try to use them correctly. Respecting individuals' gender identities creates a welcoming and inclusive environment.
- C. **Steer clear of stereotypes and assumptions:** Refrain from making assumptions or generalizations based on race, ethnicity, religion, age, sexual orientation, disability, or any other characteristic. Treat each person as an individual and avoid perpetuating stereotypes or biases.
- D. **Be mindful of ableist language:** Avoid using language that stigmatizes or excludes individuals with disabilities. Replace terms like "crazy," "lame," or "insane" with more respectful alternatives. Familiarize yourself with appropriate terminology by consulting established guidelines and resources.
- E. **Embrace inclusive terminology:** Language and societal norms evolve over time. Stay informed about evolving language and terminology. Use inclusive language that reflects current best practices and preferences within different communities.
- F. **Practice inclusivity in visuals:** Visual elements are an essential part of communication. Ensure that your visuals, such as images or illustrations, represent a diverse range of races, genders, ages, abilities, and body types. Avoid reinforcing stereotypes or presenting a narrow view of diversity.
- G. **Be open to feedback:** If someone points out that your language may be exclusionary or offensive, listen attentively and learn from their perspective. Accept feedback graciously, apologize if necessary, and make a genuine effort to improve your language choices in the future.
- H. **Consider diverse cultural perspectives:** Demonstrate sensitivity to cultural differences and diverse backgrounds. Avoid assumptions about food, clothing, traditions, or practices associated with specific cultural or ethnic groups. Seek to understand and respect individual experiences and perspectives. It's important to consider individuals who may be non-English speakers, or who may prefer to communicate in a language other than English. Consider providing translation services or resources to ensure effective communication.
- I. **Consider intersectionality:** Recognize that individuals may possess multiple identities and experiences that intersect, such as race, gender, sexuality, disability, and more. Be mindful of these intersections and avoid making assumptions based on a single identity.
- J. **Address accessibility concerns:** Consider accessibility needs when communicating through various mediums. Ensure that documents and electronic communications are accessible to individuals with visual or hearing impairments. Provide alternative formats or accommodation when necessary.

By adopting inclusive language practices as a supplier, you contribute to creating a more inclusive and equitable business environment. This fosters stronger relationships, demonstrates your commitment to diversity, and enhances collaboration with customers and partners.

Labor and Human Rights:

- A. Non-discrimination: Suppliers must ensure that their hiring practices are free from discrimination based on race, color, religion, gender, age, national origin, disability, veteran status, sexual orientation, or any other protected category.
- B. Forced Labor: Suppliers must not use forced, bonded, or indentured labor, involuntary prison labor, slavery, or trafficking of persons.
- C. Child Labor: Suppliers must adhere to local labor laws regarding the minimum age of employment and ensure that they do not use child labor.
- D. Fair Wages and Working Hours: Suppliers must provide compensation and work hours that comply with local laws, including those relating to minimum wages, overtime, and benefits.
- E. Freedom of Association: Suppliers must respect the rights of workers to associate freely, join labor unions, seek representation, and bargain collectively.

Health and Safety:

Suppliers must provide a safe and healthy working environment in compliance with local laws and regulations.

Environmental Sustainability:

Suppliers should conduct their operations in a manner that minimizes negative impacts on the environment. This includes managing resources and waste responsibly, minimizing excess and/or unnecessary waste and packaging, reducing emissions and discharges, and using environmentally friendly technologies and practices where possible.

Ethics and Integrity:

- A. Anti-corruption: Suppliers must not engage in bribery, corruption, or any other form of unethical business practice. This includes offering or accepting bribes or other illicit benefits.
- B. Confidentiality: Suppliers must protect Northeastern's confidential information and not disclose it without proper authorization.
- C. Fair Business Practices: Suppliers must conduct their business in a fair and transparent manner, avoiding conflicts of interest.

Subcontractors:

Suppliers are responsible for ensuring that their subcontractors and suppliers also comply with this Code. Northeastern reserves the right to request information or conduct audits to verify compliance.

Audit:

Northeastern or its designated representatives may audit suppliers to ensure compliance with this Code.

Enforcement and Remediation:

Violations of this Code may result in corrective actions, including termination of the supplier relationship. Suppliers are expected to take corrective actions if non-compliance is identified.

Reporting:

All parties may submit any concerns confidentially and anonymously to the Compliance Hotline, which is managed by EthicsPoint, an independent third-party company (<https://secure.ethicspoint.com/domain/media/en/gui/32115/index.html>).