SECTION 2: **PURCHASING AUTHORITIES AND CODE OF CONDUCT**

SUBJECT: **GIFTS, ANTI-KICKBACK, CONFLICT OF INTEREST & WHISTLEBLOWER NOTIFICATION PUBLICATION** **Procedure #2.5**

POLICY

The University of Washington intends to conduct all procurement activities in an ethical manner.

The University of Washington as an institution may accept gifts from vendors. Certain individuals within the University of Washington may accept gifts of nominal value (under $50 in total value annually) from vendors. Individuals with delegated purchasing authority may not accept gifts, gratuities, or items of value from vendors, but may accept promotional items of nominal value. University of Washington Medical Center employees may not accept any gifts, gratuities, or items of value from vendors. All gifts must be made in accordance with all relevant ethics statutes, rules, and requirements.

The institution is subject to Anti-Kickback, Conflict of Interest and Whistleblower legislation as part of its efforts to detect and prevent abuses and fraud. Federal Acquisition Regulations (FAR) require the University to implement procedures designed to prevent and detect violations of the Anti-Kickback Act of 1986 (**41 USC 8701-8707**). The State of Washington, under provisions of the **RCW's 42.40, 42.52,** deals with Conflict of Interest and Whistleblower issues. The Whistleblower legislation encourages employees of the state to report improper governmental action to the office of the State Auditor.

The University is required to publish this information yearly. We do so in the University Week in order to inform all University staff and faculty of their responsibilities.

PROCEDURE

The University generally may accept gifts from vendors. Vendors wishing to make gifts or donations to the University should be directed to address gifts and/or inquiries regarding donations to the **University of Washington Advancement Office**. Donations or gifts by vendors have no bearing on eligibility or preference for the Vendor to sell to the University, nor may the gift influence the nature, volume, or terms of doing business with the University.

1. Annual notification to campus

The University Internal Audit Office is responsible for publishing the annual notice. They do so after checking for State Auditor's Office updates to the University's **Whistle Blower Policy**, **Administrative Policy Statement 47.1,** and checking with the Office of Naval Research Resident Representatives (ONR) to insure that the latest anti-kickback legislation (FAR 52.203-7) is included.

2. Internal staff memo

All purchasing/ordering staff of the Procurement Services organization are expected to perform their duties in a highly ethical and professional manner. Each new employee who has buying or ordering responsibilities is required to sign a **Conflict of Interest Statement**. Staff and are required to re-confirm their compliance by initialing the original statement at least biennially. New employees also have access to the **UW New Employee Orientation on Conflicts of Interest**.