

Association of American Medical Colleges

Supplier Code of Ethical Conduct

I. Purpose

The Association of American Medical Colleges (AAMC) values its reputation for conducting business honestly and with integrity and for creating an environment that is fair, safe and supportive of employee productivity and development. The AAMC relies on many outside resources, including contractors, subcontractors, suppliers, vendors, consultants, and others (collectively, "Suppliers"), to meet operational needs and to support our commitment to strong ethical standards.

II. Expectations of the AAMC as a Customer

The AAMC is committed to a relationship with each of its Suppliers that is characterized by honesty and fairness. We are guided by the following standards of behavior.

1. The AAMC will honor any promise it makes not to disclose a Supplier's pricing, technology, or other confidential information.
2. The AAMC will not make false or misleading statements to others about Suppliers or their products or services.
3. The AAMC will adhere to its conflict of interest policy in all matters involving Suppliers.
4. The AAMC will pay all correctly-submitted and undisputed invoices, in accordance with contract terms.

III. Expectations of Suppliers to the AAMC

Suppliers who do business with the AAMC are expected to conduct business responsibly, with integrity, honesty, and transparency, and to adhere to the following principles:

1. Compete fairly for AAMC business.
2. Encourage a diverse workforce.
3. Provide a workplace free from discrimination, harassment, or any other form of abuse. Harassment includes any unwelcome conduct, verbal or physical, which can reasonably be considered to adversely affect the work environment, such as displaying sexually or racially demeaning pictures, or making jokes or offensive remarks regarding protected characteristics such as age, disability, race, ethnicity, religion, national origin, sexual orientation, sex, gender,

gender identity or expression, or political affiliation. Harassment also includes subjecting another person to unwelcome sexual advances or touching or requests for sexual favors.

4. The AAMC specifically requires that the Supplier not engage in any form of harassment as defined in Section III.3 while at the AAMC's physical locations, when interacting with AAMC staff, or otherwise when carrying out AAMC-related activities.
5. Safeguard confidential business data or sensitive personal information received as part of our supplier relationship in accordance with appropriate security and confidentiality measures and applicable restrictions on use, sharing with third parties, and disposition. Exercise due care to avoid introducing malware into the AAMC network or otherwise compromising the AAMC network security. Promptly report to the AAMC any actual or suspected unauthorized exposure or disclosure of confidential business data or sensitive personal information.
6. Comply with all applicable laws and regulations anywhere they operate, including those relating to environment, wage and hour, occupational health and safety, labor practices, child labor, forced or indentured labor, anti-bribery, and corruption.
7. Maintain accurate financial books and business records in accordance with all applicable legal and regulatory requirements and accepted accounting practices.
8. When visiting the AAMC, comply with building visitation and access policies and procedures.
9. Observe the AAMC's policies regarding gifts and conflicts of interest when dealing with AAMC employees. While occasional business meals and small tokens of appreciation such as holiday gift baskets are permitted, Suppliers may not offer AAMC employees travel, frequent or lavish meals or gifts, or gift cards or cash.
10. Report promptly any failure to comply with this Supplier Code of Ethical Conduct, including any instance of harassment as defined in section III.3 of AAMC staff or invitees by a Supplier's employee or of a Supplier's personnel by an AAMC employee. Supplier employees may report suspected violations of this Code to the AAMC's Compliance Reporting Hotline by calling 1-855-729-0137 or by visiting www.aamc.ethicspoint.com. Hotline reports are treated as confidential. Reports may be filed on an anonymous basis.
11. Support adherence to this Supplier Code of Ethical Conduct by establishing appropriate management processes and by cooperating with reasonable monitoring and assessment processes requested by the AAMC.

IV. Awareness and Training

Supplier is responsible for ensuring that its employees and agents, and those of its subcontractors, are aware of this Supplier Code of Ethical Conduct and receive appropriate training to ensure adherence. This includes disseminating awareness and training materials provided by the AAMC.

V. Other Contractual Provisions

This Supplier Code of Ethical Conduct contains general requirements applicable to all AAMC Suppliers. Individual Supplier contracts may contain more specific provisions addressing some of the same issues. Nothing in this Code is meant to supersede any more specific provision in an individual contract, and to the extent there is any inconsistency between this Code and any other provision of an individual contract, the other provision will control.

Adherence to this Supplier Code of Ethical Conduct is a condition of doing business with the AAMC. Suppliers must provide documentation demonstrating compliance with this Code upon request by the AAMC. Any violation may result in corrective action, cancellation of purchase order(s) or contract, or termination of the business relationship.

Approved by AAMC Leadership Team, August 21, 2018