



EQUITY.  
OPPORTUNITY  
FOR ALL.

# Heartland Alliance Vendor Code of Ethics

Heartland Alliance  
Heartland Alliance International  
Heartland Alliance Health  
Heartland Housing  
Heartland Human Care Services

**HEARTLAND ALLIANCE**  
ENDING POVERTY

# LEGAL COMPLIANCE AND BUSINESS

The Vendor Code of Ethics outlines Heartland Alliance principles to ensure that, despite cultural and legal differences among countries where we provide services, all of our partners share and embrace the letter and spirit of our commitment to integrity. We believe that by aligning on core values from the start, we establish the foundation for a successful long-term relationship to achieve our mutual goals.

Heartland Alliance expects its vendors and all of their employees, agents and contractors involved in performing services for Heartland Alliance entities, to comply with all applicable laws and regulations in their country of operation. Vendors must not directly or indirectly give or receive improper business advantages through the giving or receipt of anything of value in exchange for preferential treatment. The obligations in this Vendor Code of Ethics are general principles by which a vendor must comply. More restrictive requirements may be set forth in the contract entered into between Heartland Alliance and the vendor. If there is any conflict between the terms of this Code and any such contract, the terms of the contract shall control. By partnering with Heartland Alliance, in addition to any specific obligations under the vendor's contract, all vendors are required to:

- Comply with anti-corruption laws of the country in which it does business including complying with the U.S. Foreign Corrupt Practices Act and the U.K. Bribery Act.
- Never offer, make, or promise to make any illegal direct or indirect payments or promises of payments to any government officials or anyone else for the purpose of inducing to obtain or retain business.
- Conduct business in compliance with antitrust laws that govern the jurisdiction in which they operate.
- Comply with applicable anti-money laundering laws, never knowingly participating in schemes to launder money, under-report the size of a cash transaction or wrongfully avoid tax liability.
- Comply with all laws and regulations regarding the privacy of information, data protection and cross-border data transfers.
- Disclose any situation that may appear as a conflict of interest related to its business with Heartland Alliance.

Effective: 10/19/2018

# STANDARDS OF VENDOR ENGAGEMENT

We expect our vendors support by complying with our Standards of Vendor Engagement.

## **Upholding Human Rights**

Upholding Human Rights is the cornerstone of Heartland Alliance - in fact, it is even listed in our name. We fully support and stand in commitment with the Universal Declaration of Human Rights and do not knowingly conduct business with any individual or company that does not share our commitment to uphold human rights.

## **Non-Discrimination**

Vendors are expected to ensure equality of opportunity and treatment in respect of employment and occupation without discrimination. All hiring and employment decisions, including those relating to compensation, benefits, promotion, discipline and termination should be made solely on the basis of the skill, ability and performance of its workers. Discrimination should never be permitted on the basis of race, religion, gender or any other class protected by law.

## **Freedom of Association and Collective Bargaining**

Vendors are required to recognize the freely-exercised right of workers, without distinction, to organize, further and defend their interest and to bargain collectively, as well as protect workers from any action or other form of discrimination related to the exercise of their right to organize, carry out trade union activities and to bargain collectively.

## **Modern Slavery Laws**

Modern slavery is a crime and a violation of fundamental human rights which may be seen in various forms such as slavery, servitude, forced and compulsory labor and human trafficking. Heartland Alliance has a zero-tolerance approach to modern slavery and we expect the same high standards from all of our vendors.

## **Safe Working Conditions**

We expect our Vendors to provide its employees with a safe and health working environment that includes appropriate controls, safety procedures, preventative maintenance and protective equipment where applicable. Practices must comply with all relevant local and national laws, codes and regulations.

## **Harassment, Harsh or Inhuman**

**Treatment** Vendors are expected to create and maintain an environment of dignity and respect. Vendors may not use any threats of violence, sexual exploitation or abuse, verbal or psychological harassment or abuse, harsh or inhumane treatment, coercion, or corporal punishment.

## **Working Hours and Wage Laws**

Vendors should provide wages at least equal to the applicable legal minimum wage and any associated statutory benefits. If there is no legal minimum wage, our vendors must ensure that wages are at least comparable to those at similar companies in the local area or industry norms.

## **Child Labor**

Vendors should not employ children under the minimum age of employment permitted by the law of the country where performance of a contract takes place or the age of the end of compulsory schooling in that country, whichever is higher. Additionally, vendors should not employ persons under the age of 18 for work that, by its nature, is likely to harm the health, safety or morals of the individual.

## **Environmental Conditions**

Vendors are expected to have an effective environmental policy and comply with existing legislation and regulations regarding the protection of the environment. Vendors should, wherever possible, support a precautionary approach to environmental matters, undertake initiatives to promote greater environmental responsibility and implement sound life-cycle practices.

Effective: 10/19/2018

## GIFTS AND BUSINESS COURTESIES

Heartland Alliance workforce members may never solicit personal gifts or business courtesies. On limited occasions, business courtesies of nominal value (\$50 or below) may be permissible if the courtesy is infrequent (does not exceed three times per year from the same person/vendor), is not cash or a cash equivalent, is free from the appearance of extravagance or that could reasonably be perceived as an intent to influence a business decision. Business courtesies may not be offered during the bidding process (the time from bid solicitation to the award of procurement including the receiving, review and evaluation of the bid).

## CONFLICTS OF INTEREST

Vendors must act objectively in business dealings involving Heartland Alliance and avoid conflicts of interest. A conflict of interest describes a circumstance that could create doubt on whether a transaction was negotiated fairly and at arms-length. Vendors that identify an actual or perceived conflict of interest must report it immediately to Heartland Alliance.

## REPORTING VIOLATIONS

We expect our Vendors to follow the law and the spirit of this Code, and to promptly report any actual or suspected violations by any Heartland Alliance workforce member, an individual acting on behalf of a Heartland Alliance organization or one of our Vendors.



Ethics Hotline: 800-461-9330 (Outside the U.S., call 720-541-4400)



Web-based: [www.heartlandalliance.org/report](http://www.heartlandalliance.org/report)

## VENDORS CERTIFICATION OF COMPLIANCE

By acceptance of a written agreement to conduct business with Heartland Alliance, the Vendor acknowledges its acceptance of this Code and intention to comply with its requirements. Additional questions about this Vendor Code of Ethics may be directed to [erm@heartlandalliance.org](mailto:erm@heartlandalliance.org).

Effective: 10/19/2018