DJH-F(1)

BETHLEHEM ELEMENTARY SCHOOL

Code of Conduct for NSLP/SBP Procurement

Purpose: To establish standards of ethical conduct for employees, officers, agents, and representatives of the School Food Authority (SFA) who are involved in procuring products and services for the National School Lunch Program (NSLP) and School Breakfast Program.

1. **Ethical Standards and Integrity**
    - All SFA personnel must conduct procurement activities with honesty, integrity, and transparency to foster public trust.
    - Employees must uphold the principles of fairness and impartiality in every transaction, avoiding practices that could create undue favoritism or unfair advantage for any vendor or supplier.
    - All procurements should support the mission of providing nutritious, cost-effective meals for students and comply with federal, state, and local regulations.
2. **Conflict of Interest**
    - Personnel involved in procurement must avoid conflicts of interest. A conflict of interest occurs when an employee, officer, or agent has a personal or financial interest in, or is directly or indirectly related to, a vendor or supplier.
    - Any employee involved in procurement must disclose potential conflicts of interest to a supervisor or the appropriate ethics officer . This disclosure must be documented and evaluated to prevent any improper influence.
    - No individual involved in the selection, award, or administration of a contract may accept gifts, favors, or anything of monetary value from a vendor, contractor, or subcontractor. Minor items with a nominal value, such as promotional pens or notepads, are exempt.
3. **Fair and Competitive Procurement**
    - All procurement processes must be fair, competitive, and designed to secure the best products and services at the most reasonable cost.
    - Employees should promote open competition and avoid noncompetitive practices that could reduce the number of qualified vendors or restrict access to the procurement process.
    - Bid specifications must be clear, precise, and free from restrictive language that could unfairly advantage any one supplier.
4. **Confidentiality and Security of Information**
    - Procurement employees must maintain the confidentiality of sensitive information regarding bidding processes, evaluations, and vendor qualifications.

- Employees are prohibited from sharing proprietary information, bid prices, or other competitive details that could compromise the integrity of the procurement process.

5. **Transparency and Documentation**
   - Documentation must be maintained for all procurement actions, including bid requests, proposals, quotes, evaluation criteria, award justifications, and contracts.
   - Records must be retained according to federal, state, and local retention policies and must be accessible for audit and review.
6. **Oversight and Compliance**
   - Employees must comply with all applicable procurement regulations under federal, state, and local law, including the USDA's procurement standards and the Buy American provision.
   - Any violations or breaches of the code should be reported to the appropriate oversight body and may be subject to disciplinary action, including potential termination.
7. **Disciplinary Actions**
   - Violations of this Code of Conduct are subject to disciplinary actions, which may range from verbal warnings to termination of employment, depending on the severity of the violation.
   - Intentional violations, including fraudulent activities or ethical breaches, may result in further legal action as deemed necessary by regulatory authorities.

Acknowledgement and Acceptance

Each employee involved in the NSLP procurement process must read, understand, and sign this Code of Conduct, indicating their commitment to uphold these ethical standards and ensure integrity in all procurement activity.

_____ _____

Employee Signature Date