

Business Conduct – Government Clients



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USP is committed to the highest standards of integrity in all dealings with government clients, including with respect to the solicitation and performance of any contract, cooperative agreement, and prime and subcontracts. USP expects all employees who deal with government clients to act with honesty and openness and to comply with applicable government contracting rules and regulations. To ensure compliance, you must:

- Follow federal laws and regulations.
- Follow the U.S. Procurement Integrity Act and not deal in “off-limits information.”
- Follow all applicable bid and tender rules and regulations.
- Not intervene in the contractor selection process by manipulating the contents of the bids or controlling the outcome in any other manner.

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- Not intervene in the bidding process, directly or indirectly, by favoring one approved/certified/elite or other authorized contractor over another in the pricing of USP products.
- Not initiate employment discussions with a government official who currently has or in the immediate past has had discretionary or regulatory responsibilities over USP, without getting guidance from Human Resources, GCE, or GLA.

If you are involved with government clients, you are expected to fully understand and comply with applicable provisions of the relevant government contract, rules, and regulations that affect your responsibilities at USP.

Any employee who believes that he or she is aware of a violation of applicable law or government contractual requirement when dealing with government clients must promptly bring it to the attention of the appropriate resources in this Code. Failure to report is itself a violation of USP policy and could subject an employee to disciplinary action up to and including termination.

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