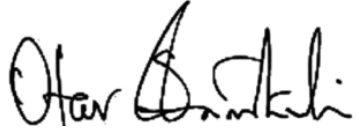






 <p>مدينة الشيخ شخبوط الطبية Sheikh Shakhbout Medical City</p>	Sheikh Shakhbout Medical City		
	Title: THIRD PARTY CODE OF CONDUCT POLICY	Issue Date	19 June 2023
		Last Reviewed	19 June 2023
		Next Review	19 June 2025
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Version: 1			


Policy, Procedure and Program Approval Sheet

Document title: Third Party Code of Conduct Policy	Document number : SSMC/SC/PUR/PP/019	Version number : 1
		Supersedes policy : N/A
Regulatory / certification/ Accreditation requirements	<input type="checkbox"/> Federal law <input type="checkbox"/> DOH <input type="checkbox"/> OSHAD <input type="checkbox"/> FANR <input checked="" type="checkbox"/> JCIA <input type="checkbox"/> CCPC <input type="checkbox"/> CAP <input type="checkbox"/> AABB <input type="checkbox"/> ISO <input type="checkbox"/> Other, please specify	
Related JCIA chapter/s and/or other standards	<input type="checkbox"/> IPSG <input type="checkbox"/> ACC <input type="checkbox"/> PCC <input type="checkbox"/> AOP <input type="checkbox"/> COP <input type="checkbox"/> ASC <input type="checkbox"/> MMU <input type="checkbox"/> QPS <input type="checkbox"/> PCI <input checked="" type="checkbox"/> GLD <input type="checkbox"/> FMS <input type="checkbox"/> SQE <input type="checkbox"/> MOI <input type="checkbox"/> Others: {Specify}	
<input type="checkbox"/> The policy is consistent with, and does not duplicate, SEHA and SSMC's policies. <input type="checkbox"/> All of the titles and names of (individuals, groups, committees, related documents, forms, etc.) are accurate. <input type="checkbox"/> All of the hyperlinks are correct and functional. <input type="checkbox"/> This is a new policy		
Approvals		
Initiator:	Name: Otar Sarishvili Position: Senior Director, Supply Chain, Strategic Sourcing and Clinical Integration Department: Supply Chain, Strategic Sourcing and Clinical Integration	 Signature
		 Signature
Reviewer & Endorser	Name : Michael James Ryan Position : Chief Administrative Officer Committee name : Chief Administrative Office	 Signature
		 Signature
Approver	Name: Dr. Naser Mahmud Ammash Position: Chairperson Committee name: Executive Operations Team (SEOT)	 Signature
		 Signature

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1. Purpose

1.1 This Third Party Code of Conduct document – hereinafter referred to as the “Code” – is to protect integrity of the procurement process. It provides a statement governing the conduct of contractors, subcontractors, suppliers, vendors, customers, consultants, business partners, their representatives or employees of such organizations (hereinafter collectively referred to as “Third Party”) working for or on behalf of SSMC so that they will be able to compete fairly, and perform their work and services, in an ethical manner.

2. Scope

2.1 This policy will be implementd on all contractors, subcontractors, suppliers, vendors, customers, consultants, business partners, their representatives or employees of such organizations (hereinafter collectively referred to as “Third Party”) working for or on behalf of SSMC.

3. Target Audience

3.1 This document applies to all contractors, subcontractors, suppliers, vendors, customers, consultants, business partners, their representatives or employees of such organizations

4. Definitions

N/A

5. Abbreviations

SSMC	Shiekh Shakhbout Medical City
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6. Policy Statement

6.1 SSMC is highly committed to govern the conduct of contractors, subcontractors, suppliers, vendors, customers, consultants, business partners, their representatives or employees of such organizations (hereinafter collectively referred to as “Third Party”) working for or on behalf of SSMC so that they will be able to compete fairly, and perform their work and services, in an ethical manner.

7. Guidelines / Procedure

7.1 Third Party Responsibilities:


7.1.1 Third Party upon their work for or on behalf of SSMC shall adopt and implement the standards of compliance and ethical behaviour as provided in this Code, and take appropriate steps to ensure that the Code is communicated to, and adhered to, by their officers, employees, contractors, suppliers, representatives.

7.1.2 Third Party shall comply, without limitations, with the Code of the following business and legal practices:

7.1.2.1 Not solicit or obtain, directly or indirectly, from any SSMC employee, any information related to current or future contracts, or a specific pending procurement, unless such information is public at the time, or has been made a public record required to be disclosed, or has otherwise been made available at the same time in the same form to all other bidders or contractors

7.1.2.2 Not collude, directly or indirectly, with any other competing entity prior to the bid closing date;


7.1.2.3 Not make any attempt to induce any other individual or entity to submit or not to submit a bid;

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- 7.1.2.4 Unless otherwise approved, Third Party engaged by SSMC in the development of a scope of work, solicitation documents, contractual instrument, or technical specifications shall not participate as a contractor or sub-contractor in that particular procurement, or perform any work in that particular procurement, or any other procurement that would constitute an organizational conflict of interest, or would give that contractor and unfair advantage over other bidders in that procurement event;
- 7.1.2.5 Third Party doing or seeking to do business with SSMC shall not make false or misleading representations regarding any aspect of the performance of a contract/price agreement;
- 7.1.2.6 Third Party shall not provide any financial assistance for training or conferences and the alike (in cash or kind, or other sponsorship benefits like registration fees/accommodation/travel) directly to any SSMC personnel including healthcare professionals on a one-to-one basis. If there is a desire to provide such financial assistance, Third Party shall approach the Education Department at SSMC who will follow the relevant compliance policies and procedures;
- 7.1.2.7 Third Party shall immediately disclose any actual or potential conflict of interest to SSMC, and shall not deal directly with any SSMC employee whose family member,
- 7.1.2.8 Third Party shall exercise reasonable care and diligence to prevent any actions or conditions, which could result in a conflict with the best interests of SSMC. Third Party's efforts shall include, but not be limited to, establishing precautions to prevent its employees, contractors, suppliers, representatives, etc., from making receiving, providing, or offering bribes, gifts, entertainment, payments, loans, or other considerations for the purpose of influencing individuals to act contrary to the relevant UAE laws and regulations and applicable ethical practices at SSMC;
- 7.1.2.9 At no time shall Third Party who obtains information confidential and proprietary to SSMC in the course of doing or seeking to do business with SSMC disclose any such information to any person not authorized by SSMC to receive such information, or use such information for any personal gain except as necessary to fulfil their contractual obligations to SSMC;
- 7.1.2.10 Third Party shall not make any references to SSMC or the work/services performed by Third Party for SSMC on any Social Media Platform, advertising or other publications without prior written consent from SSMC.

7.2 Legal Practices

- 7.2.1 Third Party shall comply at all times with all applicable laws, rules and regulations of the Emirate of Abu Dhabi and UAE;
- 7.2.2 Third Party shall make available to SSMC or its appointed representative(s) all relevant information and documents needed to verify compliance with this Code;
- 7.2.3 Third Party is expected to cooperate with investigations conducted by SSMC or its appointed representative(s).
- 7.2.4 In the event Third Party fails to comply with this Code, SSMC – at its sole discretion – may suspend current business activity, cancel outstanding tasks/purchase orders, or terminate its

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contractual relationship with such Third Party. Based on the violation of this code SSMC shall not be responsible to pay such Third Party.

7.3 SSMC’s Compliance and Ethics Section

7.3.1 If you are aware of an actual or potential violation of this Code, please contact SSMC’s Corporate Ethics and Compliance Section at: SSMCEthics&Compliance@ssmc.ae

7.3.2 Thank you for complying with this Code and we look forward to a mutually beneficial relationship based on the highest levels of ethical behaviour.

8. Responsibilities

- 8.1 Senior Director, Supply Chain, Strategic Sourcing and Clinical Integration initiates the policy
- 8.2 Legal Advisor reviews the policy
- 8.3 Chief administrative officer reviews the policy
- 8.4 SEOT reviews and approves the policy

9. Compliance Monitoring

NA

10. Appendices

N/A

11. References

NA

12. Revision History

Date	Synopsis of Change
NA	NA