



## Arecibo Observatory

Office of the Director

SUBJECT: Conflict of Interest training and oversight in the Procurement Department at AO	Effective Date: 04-30-2020	Policy Number: AO-POPR09
	Page 1	Of 2
	Responsible Authority: Support Operations Manager	

DATE OF INITIAL ADOPTION AND EFFECTIVE DATE: April 30, 2020

### APPLICABILITY/ACCOUNTABILITY

This policy is applicable to the administrative staff and stakeholders at the Arecibo Observatory responsible for procurement of professional services and materials.

### GENERAL POLICY

This policy establishes the guidelines that must be followed by all personnel in charge of procurement.

### POLICY STATEMENT

The Arecibo Observatory (AO) procurement office will adhere to applicable conflict of interest guidelines when initiating procurement actions.

### Guidelines

Conflict of interest is included in the Yang Enterprises Inc. Policies and Procedures Manual for the Management and Operations of the Arecibo Observatory. A copy of this manual is issued to all YEI

AO-POPR09 Conflict of Interest training and oversight in the Procurement Department at AO

employees as part of the in briefing when hired. YEI employees also receive yearly ethics training covering a wide range of topics including conflict of interest. The Human Resources Office of YEI keeps documentation on attendance to these briefings. Procurement and logistics personnel assigned to the Support Operations Branch are required to follow Conflict of Interest policy stated in their corresponding job descriptions.

Some of the topics covered under YEI Conflict of Interest Policy include:

1. Acceptance of gift and entertainment from customers or suppliers by employees, family or friends.
2. Revealing confidential information or trade secrets
3. Employees shall not have any personal investment interest in any customer or supplier without complete prior disclosure to and approval by YEI President.

Violating this policy will subject the individual involved to disciplinary action, up to and including termination.

#### REFERENCES

Yang Enterprises Inc. Policies and Procedures Manual

#### CONTACTS

Operations and Maintenance Director, ext. 369

Support Operations Manager, ext. 257

#### INITIATING AUTHORITY

Director of the Arecibo Observatory

<b>POLICY APPROVAL</b>	
<b>(For use by the Office of the Director)</b>	
<b>Policy Number:</b> AO-POPR09 Conflict of Interest training and oversight in the Procurement Department at AO	
<b>Initiating Authority:</b> _____	<b>Date:</b> _____
<b>Principal Investigator:</b> _____	<b>Date:</b> _____

AO-POPR09 Conflict of Interest training and oversight in the Procurement Department at AO