



Responsible Office: Procurement Operations
Administering Official: Executive Director, Procurement Operations
Effective Date: July 22, 2025
Applicable Policy: Procurement Guidelines - Ethics Policy

Procurement Guidelines are issued by the Executive Director under Article 1 of the Houston City College Procurement Operations Procedures Manual.

Procurement Operations Guidelines for Ethics Policy

PURPOSE AND SCOPE

The Procurement Operations Department, which includes Procurement and Contract Administration, is responsible for all procurement activities on behalf of the entire Houston City College System (HCC). This guideline supplements applicable Texas state laws, HCC policies, and resolutions, including those governing sole-source procurements.

GUIDELINES

1. Prohibited Gifts and Benefits

- a. No member of the HCC community may directly or indirectly accept, for themselves or any other party, any gift, favor, gratuity, or item (tangible or intangible) that provides a personal benefit from any individual or entity doing business or seeking to do business with HCC, if the value is fifty dollars (\$50) or more.
- b. Items with a value of less than fifty dollars (\$50) may be accepted under certain circumstances, provided they are not cash, checks, or negotiable instruments, and only if acceptance does not create the appearance or risk of improper influence, a conflict of interest, or a violation of law or HCC policy.
- c. All gifts, regardless of value, that could reasonably be perceived as influencing decision-making, or that create an actual or perceived conflict of interest, must be refused or promptly reported.
- d. Cash, checks, or equivalent financial instruments may never be accepted under any circumstances.

2. Professional Conduct Standards

- a. Act with integrity and transparency: Prevent both the intent and appearance of unethical or compromising conduct in all relationships, actions, and communications.
- b. Avoid conflicts of interest: Ensure personal, professional, or business interests do not conflict, or appear to conflict, with the best interests of HCC.
- c. Promote fair competition: Treat all suppliers impartially and avoid any favoritism, improper reciprocal agreements, or unfair influence.
- d. Safeguard confidential information: Protect the confidentiality of all proprietary and sensitive information, considering all ethical, legal, and regulatory requirements.
- e. Uphold responsibilities to HCC: Use the authority granted by HCC with diligence and reasonable care, in accordance with all policies, laws, and regulations.
- f. Develop and maintain professional competence: Continuously improve knowledge and skills related to compliant, best value purchasing.

3. Supplier and Vendor Relationships

- a. Conduct all business dealings with suppliers in a fair, objective, and transparent manner.
- b. Do not request or require vendors to make donations or provide goods/services as a condition for business.
- c. Select suppliers based on objective criteria such as overall best value, quality, and ability to comply with HCC standards.

Report any suspected ethical violations or conflicts of interest related to procurement, contracting, or vendor relationships immediately to the HCC Office of the General Counsel at (713) 718-7514.