



H-P5.4.2 Procurement Policy

Procurement Policy—H-P5.4.2

Scope: Creative’s Procurement Policy represents the basic intentions and goals of the Company and establishes the foundation upon which the Procurement Department operates.

Policy Contents:

Section I: Goal and Purpose

Section II: Authority and Delegation

Section III: Ethics and Conflicts of Interest

Section IV: Competition and Types of Procurements

Section V: Relations With Vendors

Section VI: Relations With Other Departments

Section VII: Procurement Records

Section VIII: Risk Management

Section III: Ethics and Conflicts of Interest

Procurement staff are expected to be free of interests or relationships that are actually or potentially detrimental to the Company. They shall not engage or participate in any commercial transaction involving the Company in which they have an undisclosed interest. In addition to being in violation of the employee’s duty of loyalty to Creative, improper relationships with vendors are at odds with the Company’s goal of treating fairly and impartially all persons and entities engaged in business dealings with Creative. The Procurement Department will adhere to and abide by the Company’s Ethics Policy and the Company’s Conflicts of Interest Policy in all procurement matters.
