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## 2304 PURCHASES FROM RELATED PARTIES

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Effective: Dec. 1986  
Revised: November 2006  
Last Reviewed: April 2016  
Responsible Office: Purchasing Services  
Approval: President

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### PURPOSE

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To preclude conflicts of interest with regard to related party purchases.

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### POLICY

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1. The Trustees of the University of Pennsylvania have adopted a policy establishing comprehensive guidelines for dealing with conflicts of interest on the part of faculty, trustees, associate trustees, overseers, officers and other employees of the University. There are also other conflict of interest policies (see the [Conflict of Interest Policy for Faculty Members](#)) which relate to purchasing. This policy supplements, but does not modify or replace, other University policies on this subject.
2. In addition to complying with all other relevant policies with regard to procurement, University faculty or staff will not knowingly solicit or acquire goods or services from any supplier that:
  - a. Is owned, controlled, or actively influenced (with regard to any proposed transaction with the University) by any employee, faculty member, trustee, member of a board of overseers of the University or their immediate families; or
  - b. Employs, in a sales capacity, any person who is a full-time, employee, faculty member, trustee, member of a board of overseers of the University or their immediate families.
3. The President must approve, in writing, any transaction from a related party prior to the issuance of a purchase order or use of a procurement credit card.