

THE PENNSYLVANIA LIQUOR CONTROL BOARD



**VENDOR  
CODE OF CONDUCT**



**pennsylvania**  
LIQUOR CONTROL BOARD

The Pennsylvania Liquor Control Board (“PLCB”) is committed to maintaining the highest ethical standards in all of its operations. The PLCB expects its liquor vendors and their employees and agents (collectively referred to as “vendors”) to embrace this commitment by complying with and training their employees on the PLCB Vendor Code of Conduct.

### **I. Compliance With the Vendor Code of Conduct:**

Vendors must adhere to this code of conduct while conducting business with PLCB. While vendors are expected to self-monitor their compliance with this code of conduct, the PLCB may, from time to time, audit vendors to confirm compliance. *The PLCB may prohibit any vendors who behave in a manner that is unlawful or inconsistent with this code of conduct from doing business with the PLCB.*

### **II. Legal and Regulatory Compliance:**

All vendors must conduct their business activities in full compliance with Pennsylvania and federal laws and regulations while conducting business with the PLCB. Specifically, vendors:

1. Must not, directly or indirectly, offer anything of value to any Board Member or employee of the PLCB, in any status (referred to herein collectively as “employees of the PLCB”).
2. Must not, directly or indirectly, attempt to induce the PLCB to purchase products, to the complete or partial exclusion of products sold or offered for sale by other persons, by offering or giving a bonus, premium, compensation or other thing of value to any employees of the PLCB. The bonus, premium, compensation or other thing of value need not be offered or given for the purpose of directly inducing the PLCB to purchase from the seller, but rather is applicable if an industry member induces any employees of the PLCB to promote sales of the vendor’s products and thereby indirectly induces the PLCB to purchase from the vendor.
3. Must not require the PLCB take or dispose of any quota of distilled spirits or wine.
4. Must avoid the appearance of or actual improprieties or conflicts of interests.
5. Must maintain the highest standards of integrity in the performance of its duties and shall take no action in violation of state or federal laws, regulations or other requirements that govern doing business with the PLCB.

6. Each vendor has the continuing duty to review and assess his or her conduct in light of this code of conduct; report any conflicts that may arise throughout the year; and cooperate fully with the PLCB in all matters relating to the operation and enforcement of the code of conduct.
7. It shall be the responsibility of each vendor to disseminate this Vendor Code of Conduct to all employees and agents who will or may have direct contact with employees of the PLCB.

### **III. Reporting Obligation:**

Any vendor who has knowledge of, or reason to believe that a violation of this code of conduct, section 210 of the Liquor Code and/or section 491(14) of the Liquor Code has occurred or is occurring shall immediately notify the Chief Counsel of the PLCB. ***Please note, that this reporting requirement is prospective and shall apply only to violations currently taking place or that occur after the receipt and acknowledgment of this code of conduct.*** In the event that the Chief Counsel is known to be involved in the alleged violation, the matter should be reported to the Executive Director. In the event that both Chief Counsel and Executive Director are known to be involved in the alleged activities, the matter should be reported to any Board Member. In the event that all of these individuals are known to be involved in the alleged activities the matter should be reported to any member of the PLCB Executive Team not involved in the alleged activities.

### **IV. Required Cooperation and Testimony:**

1. As a term and condition of doing business with the PLCB, vendors shall, subject to the exercise of any legal right and/or privilege, appear and testify upon matters directly related to the conduct of his or her position before any state or federal court, grand jury or state investigative organization.
2. Vendors shall fully cooperate with any investigation conducted by the PLCB or any state or federal investigative agency regarding alleged violations of this Vendor Code of Conduct, the PLCB Code of Conduct, sections 210 and 491(14) of the Liquor Code or any other violation of state or federal law. In order to effectuate this duty to cooperate, the vendors agree:
  - i. The PLCB shall have the right, at reasonable times and at a site designated by the PLCB, to audit the books, documents and records of the vendor to the extent that the books, documents and records relate to alleged violations of the Vendor Code of Conduct, the PLCB Code of Conduct or sections 210 and 491(14) of the Liquor Code;
  - ii. To provide, upon request of the PLCB, any and all records relating to expenses incurred during interactions with employees of the PLCB.

**V. Acknowledgment:**

I hereby acknowledge that I am authorized to act on behalf of \_\_\_\_\_ (vendor company name). I have received and fully reviewed a copy of the PLCB Vendor Code of Conduct and I understand the obligations contained in the code. I acknowledge that this code will be disseminated to all employees who may come into contact with employees of the PLCB. I recognize that the PLCB is committed to the standards contained in the code and that any violations will result in appropriate disciplinary action. Please complete the acknowledgement and email it to RA-LBVendorCC@pa.gov to be kept on file.

\_\_\_\_\_  
Print Name

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Title

\_\_\_\_\_  
Company Name

\_\_\_\_\_  
Date

A dark blue horizontal band spanning the width of the page. In the background, there is a faint, light-colored image of a building with a dome and a flag on a pole. The text is centered in the middle of this band.

**Effective September 1, 2014**