



## AN ETHICAL CULTURE REQUIRES TRUST

Your employer may have their own specific guidelines, but while working with JPL, we want to be certain you understand your obligation to ensure that business is conducted with high ethical standards. JPL employees and subcontractors must work together to foster an environment that exemplifies your employer's standards and JPL's core values of Openness, Integrity, Quality, Innovation, and Inclusion. We trust our subcontractors to help us maintain our high standards.

As a member of JPL's subcontractor community, it is essential that you comply with:

- Your employer's Code of Conduct or workplace policies
- Caltech's Code of Conduct (aka, the 11 principles)
- The JPL Honor Code

### WE HAVE A PUBLIC TRUST

JPL is a Federally Funded Research and Development Center (FFRDC) managed by Caltech for NASA. As such, JPL employees and subcontractors have a public trust. We honor that trust by using the resources the public gives us in an innovative, efficient, and accountable manner.

### WE OBEY THE LAW

JPL works hard to ensure that it operates as a responsible government contractor. Under its Prime Contract, JPL adheres to applicable federal laws and regulations, and specifically those pertaining to cost accounting, export control, government security, and procurement. JPL relies on subcontractors who have the same commitment to obeying the law.

### WE OPERATE WITH INTEGRITY

In addition to obeying the law, JPL conducts business in accordance with high ethical standards and we expect our subcontractors to do the same. **Regardless of their affiliation or position, we expect everyone associated with JPL's name, to make this commitment their own.**

JPL relies on teams consisting of JPL employees and subcontractors to operate with integrity. An ethical foundation is key to our success and creates an atmosphere of respect, which strengthens all of us.

### CONFLICT OF INTEREST

As a subcontractor, be mindful that a conflict of interest is a situation in which your responsibilities to your employer and JPL conflict with, or appear to conflict with, your private or personal interests. For example:

- Do not use your role at, or access to, JPL for improper personal gain for yourself or any person with whom you have personal, business, or financial ties

- Avoid any activity or decision that could reasonably be perceived as adversely affecting the objectivity of your judgment, or interfere with the timely and effective performance of your work with JPL
- If you think there is even a slight chance you might have a conflict of interest, disclose it to your employer and/or the JPL Ethics Office

Common areas where JPL subcontractors may become involved in a conflict of interest include, but are not limited to:

- Financial interests in business entities that are JPL suppliers, partners, or competitors
- An immediate family member's financial involvement or employment with a JPL supplier, partner, or competitor
- Personal relationships with JPL employees or employees of other business entities that could influence, or appear to influence, your decisions while performing JPL work

### GIFTS AND GRATUITIES

Both JPL employees and subcontractors must not solicit or accept from any JPL supplier or other interested party, a gratuity or other thing of value, either directly or indirectly, for themselves or for persons with whom you have personal, business, or financial ties. It, therefore, follows that, as a subcontractor, you must not offer gifts and gratuities to JPL employees.

The most common exceptions to this rule are:

- Anything for which fair market value is paid by JPL employees
- Purchase of goods and services by JPL employees at discounts openly offered to all customers
- Plaques, certificates, or mementos having no intrinsic value
- Any unsolicited advertising or promotional item (e.g., pens, calendars, etc.) valued at \$20 or less, with a maximum of \$50 from any one supplier per calendar year

In addition, employees and subcontractors must exercise personal judgment in determining whether acceptance of an exempted item could affect their impartiality, or reasonably be construed by others as cause for partiality. Even though acceptance of a gift may be permitted by an exception, it is never inappropriate, and frequently prudent, to decline a gift.

### KICKBACKS: STRICTLY PROHIBITED

A gratuity may become a kickback when there is a "quid pro quo" or "this for that" situation. **Kickbacks violate the law.** Soliciting, accepting, or providing kickbacks, or attempting to do so, is strictly prohibited and may result in civil and criminal penalties. Any violation, or possible violation, concerning kickbacks must be promptly reported to your employer and/or the JPL Ethics Office.



### USE OF RESOURCES

Laboratory resources are provided to JPL employees and subcontractors for the conduct of JPL business. These resources may not be used for personal activities, except to the extent authorized by Institute policy.

Resources include all facilities and grounds; monies; property; equipment; vehicles; supplies; phones; computers; computer accounts and services; software; email; copiers; Internet access; the names and logos of Caltech, JPL, or NASA; intellectual property; and JPL work time.

No Laboratory resources may be used to:

- Promote, sell, or trade goods or services for any promotional, profit-making, or non-profit endeavor
- Share your views, promote, or take positions on political, religious, or social issues
- Engage in illegal conduct or conduct that violates Institute or your employer's policy



### FINANCIAL INTEGRITY

Every JPL employee and subcontractor must ensure financial integrity. All JPL financial transactions, including transactions related to labor charging, labor allocation, and timekeeping, must be recorded with complete integrity. Transactions must be accurate, reliable, timely, and consistent with JPL's established financial practices.

### INFORMATION INTEGRITY

The proper generation, dissemination, and safeguarding of information is key to JPL's success. Every JPL employee and subcontractor is responsible for the integrity, accuracy, quality, and protection of JPL data and information. This includes, but is not limited to:

- Technical and business documents
- Communications
- Financial records
- Reports
- Timekeeping records
- Inspection and safety records
- Invoices

JPL internal controls and practices must never be circumvented.

We believe that good business relationships rely upon a shared commitment to these values. We expect our subcontractors to embrace these values, and in return, our subcontractors should expect JPL employees to model these values and to conduct business ethically.

If you have questions about anything in this pamphlet, need advice, or want to discuss concerns, please contact your employer and/or the JPL Ethics Office.

**Email:** [Ethics-Office@jpl.nasa.gov](mailto:Ethics-Office@jpl.nasa.gov)

**Address:** 4800 Oak Grove Drive, 114-120  
Pasadena, CA 91109-8099

**Main Line:** (818) 354-6338

**Anonymous Helpline:** (818) 354-9999 or  
toll-free at (866) 405-7536.

**Website:** <http://ethics.jpl.nasa.gov>

This document complements existing contracts, agreements, commitments, and obligations for those with whom we conduct business.

National Aeronautics and Space Administration

**Jet Propulsion Laboratory**  
California Institute of Technology  
Pasadena, California

**[www.nasa.gov](http://www.nasa.gov)**

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# Good Relationships Begin with Trust



## Ethical Guidelines for JPL Subcontractors