

JPL and supplier employees are prohibited from:

- Providing, attempting to provide or offering to provide any kickback;
- Soliciting, accepting or attempting to accept any kickback;
- Including, directly or indirectly, the amount of any kickback in the contract price charged by a subcontractor to JPL.

Any violation or possible violation concerning kickbacks must be promptly reported directly to the JPL Ethics Office.

JPL values openness, integrity, quality and innovation in all we do.

Use of JPL Resources

Laboratory resources are provided to JPL employees and on-site contractors for the conduct of JPL business, the performance of work-related duties, professional education and training. These resources may not be used for personal activities except to the extent authorized by written Laboratory policies or in support of activities approved by the Director or Deputy Director.

Resources include all facilities and grounds, moneys, property, equipment, vehicles, supplies, computers, computer accounts and services, software, e-mail, fax machines, copiers, access to internet services (e.g., web, ftp), the name of Caltech or JPL, intellectual property and employees' work time.

While limited use of some Laboratory resources for activities not directly supporting JPL work may be authorized, no Laboratory resources may be used to:

- Promote, sell or trade goods or services for any promotional or profit-making endeavor;
- Share your views, promote or take positions on political, religious or social issues;
- Engage in illegal conduct or conduct that violates Institute policy;
- Conduct personal business, except as provided below.

Limited, occasional use of electronic information resources for personal, non-business purposes is understandable and acceptable as long as such use:

- Does not adversely affect the performance of the employee's official duties or the effective functioning of their organization;
- Is of reasonable duration and frequency;
- Is not prohibited by the organization's management;
- Does not violate state or federal laws, Institute policy, or compromise intellectual property rights.

We believe that good business relationships rely upon a shared commitment to these values. We expect our suppliers to embrace these values, and in return, our suppliers 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 the JPL Ethics Office.

Ethics-Office@jpl.nasa.gov
4800 Oak Grove Drive, 114-120
Pasadena, CA 91109-8099
(818) 354-6338

To report concerns or seek advice anonymously, please call the JPL Ethics Helpline at (818) 354-9999 or toll-free at 1-866-405-7536.

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

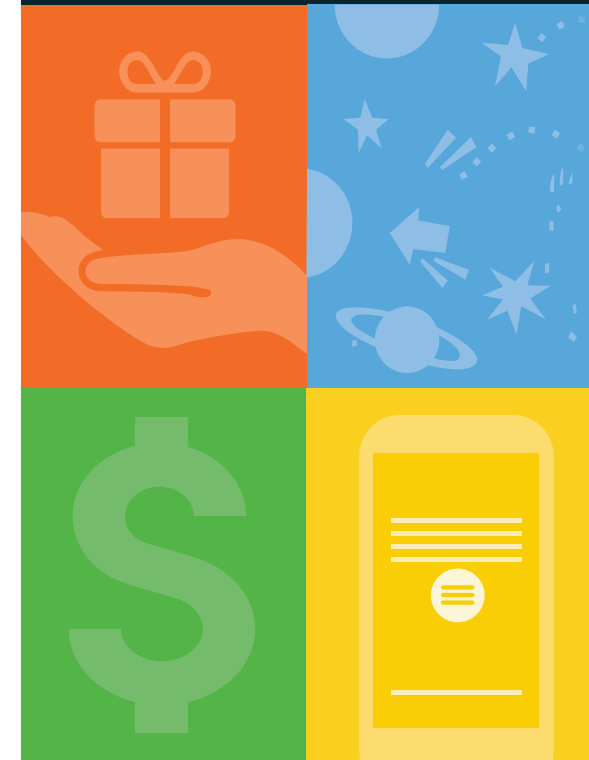


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Good Relationships Begin with Trust

Ethical Guidelines for JPL Suppliers



Jet Propulsion Laboratory
California Institute of Technology

Good Relationships Begin with Trust

To **ensure** that business is conducted with high **ethical standards**, JPL employees and suppliers must **work together** to foster an environment of **fair and open competition**. In such an environment, unethical behavior simply has no place. We trust our suppliers to **help us** maintain our high standards.

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 suppliers 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, such as those pertaining to export control, government security and procurement requirements. JPL wants to work with suppliers who have the same commitment to obeying the law.

We Conduct Business Ethically

In addition to obeying the law, JPL conducts business in accordance with high ethical standards and we want to do business with suppliers who do the same.

We expect everyone associated with JPL's name, whether JPL employees or suppliers, and regardless of position, to make this commitment their own. Suppliers, consultants, agents, contract labor, employees of limited liability companies and joint ventures and anyone who represents JPL in any capacity are responsible for the integrity and consequences of actions they take which could reflect on their relationship with JPL.

Conflict of Interest

A conflict of interest is a situation in which our official responsibilities as JPL employees or suppliers conflict with, or appear to conflict with, our private or personal interests. There are three guiding principles that will help avoid conflicts of interest.

- Do not use your position at 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 job.

- If you think there is even a slight chance you might have a conflict of interest, let someone else in authority decide whether you really do or not.

The following are some of the more common areas where JPL employees and suppliers may become involved in conflicts of interest:

- Outside employment in areas similar to those in which JPL is involved; e.g., employment with a JPL customer, supplier or competitor.
- Financial interests in business entities that are suppliers, partners or competitors.
- Personal relationships with employees of other business entities that could influence your decisions concerning the selection of a supplier or its products.
- Acting as a consultant, advisor or expert witness in a legal process, such as a lawsuit, administrative proceeding, mediation, investigation or rule-making process.
- An immediate family member's financial involvement or employment in a supplier, partner or competitor.

Gifts and Gratuities

Employees and suppliers must not solicit or accept from any supplier or any entity that wants to do business with JPL a gratuity or other thing of value, either directly or indirectly for themselves, or for persons with whom they have personal, business or

financial ties. It follows, therefore, that suppliers must not offer gifts and gratuities to JPL employees and suppliers.

The most common exceptions to this rule are:

- Anything for which market value is paid.
- Purchase of articles or services at advantageous rates or discounts openly offered to all JPL employees.
- Plaques, certificates or mementos having no intrinsic value.
- Any unsolicited advertising or promotional item such as pens, calendars or other items having a market value of no more than \$20 per item or event, with a maximum of \$50 from any one vendor in a calendar year.

Employees and suppliers must exercise personal judgment in determining whether acceptance of an excepted 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

A kickback is anything of value which is provided either directly or indirectly to JPL, a JPL employee, a supplier or supplier employee for purposes of improperly obtaining or rewarding favorable treatment in connection with award or performance of a JPL subcontract.