



memorandum

Ethics and Audit Division

To/MS: All Employees
From/MS: Jeanette Y. Bennion, EA-DO, A249
Phone/Fax: 5-3104/Fax 7-7340
Symbol: EA-DO-15-029
Date: November 19, 2014

SUBJECT: CODE OF CONDUCT REGARDING HOLIDAY GIFTS

Holiday season is here again, and we need to remember our responsibilities as Laboratory employees. The holiday season brings gifts and invitations to open houses from customers, suppliers, and vendors that we do business with all year. It is important that we all understand the proper way to handle these activities as employees and representatives of the Laboratory.

Laboratory employees should not accept gifts from customers, suppliers, or vendors. Perishable food items such as tins of popcorn, boxes of candy, or cookies should be graciously discouraged but need not be returned if they are of nominal value and can be shared by a Group, Division, or Directorate. Promotional items (e.g., hats, pens, or paperweights with a company logo on them) may be accepted only if they are of nominal value and are not intended to influence your judgment. We define nominal value as a market value of \$20 or less per gift/occasion and aggregating to no more than \$50 per calendar year to or from any one source. Items other than food or promotional items should be returned with an apologetic thank you note stating that Laboratory policy does not permit employees to accept such gifts. **For additional guidance, please refer to LANL's [Code of Conduct](#), [PD801](#), [Ethics Program](#), and [P722](#), *Business Gifts and Gratuities*.**

Employees must use their best judgment and seek supervisory approval prior to accepting any supplier invitations to open houses or supplier-sponsored holiday events. Perception must always be considered in these situations. Clearly lavish or extravagant events must be avoided.

While we all wish to celebrate the holiday season, remember that integrity and ethics are vital to our reputation and our future. If you have questions about a specific event or item, please contact me at 665-3104, or Michelle Cantu, Ethics and Compliance Group Leader, at 667-7506.

Have an enjoyable and safe Holiday Season!

Distribution:
IRM-RMMSO, A150
EA-DO
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