

*Subject:* Code of Conduct

*Administrative Procedure* **A-1**

*Date:* 27 March 2013

*Point of Contact:* Technology & Contracts Office

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See also [A-14](#), Guidelines for Professional Outside Activities

[A-20](#), Consultants

[A-56](#), Conflict of Interest

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### ***ABSTRACT***

*On 14 September 2012, the Director's Office issued the Lincoln Laboratory Code of Conduct. Your Group, Department, or Division Office, the Technology and Contracts Office, the Laboratory Ethics Officer, and the Director's Office are all available to discuss your questions or concerns.*

#### **I. THE CODE OF CONDUCT**

##### **A. Integrity in Our Compliance with Laboratory Policy**

Each individual makes critical contributions to the ethical atmosphere in which we work, and each individual has a responsibility to act in a manner consistent with Laboratory policy. Individuals are expected to

- Remain free from conflicts of interest (whether actual or perceived);
- Treat others with respect, dignity, and inclusion; and
- Avoid even the appearance of impropriety.

All Laboratory policies and procedures are available through the internal Laboratory website.

##### **B. Integrity in Our Compliance with Laws and Regulations**

Each individual is expected to remain in strict compliance with all applicable laws and regulations, and to seek help when a proper course of action is not clear. Individuals are expected to

- Comply with all applicable U.S. Government contracting requirements for procurement integrity and for interacting with current or former Government personnel;
- Refuse any illegal or improper payments and refrain from anticompetitive behavior and activities construable as insider dealings;
- Seek guidance in work-related interactions with foreign nationals and foreign countries;
- Cooperate with government agencies responsible for compliance, audit, or investigation; and
- Abide by the requirements of all environmental, health, and safety laws and regulations.

### C. Integrity in Our Laboratory Work

Each individual has a duty to ensure that all products, tests, data, reports, billings, communications, and other artifacts are created, compiled, and delivered with the utmost integrity. One's work product should always reflect our independence and objectivity. Individuals are expected to

- Use Laboratory and US Government property only for approved purposes;
- Protect Laboratory Intellectual Property from infringement;
- Conserve resources whenever possible; and
- Safeguard sensitive information, including classified, proprietary, export-controlled, and privacy-related data.

## II. APPLICABILITY

This Code of Conduct applies to all Laboratory employees, Advisory Board members, Intergovernmental Personnel Act assignees, Subcontractors, Consultants, Vendors, Interns, Lincoln Scholar students, Student Advisers, and Research Assistants, wherever located and whether full or part time. Individuals are expected to acknowledge that they have read and agreed to abide by the Code of Conduct. The Code of Conduct is in addition to other policies, administrative procedures, and obligations that individuals may have in their relationship with Lincoln Laboratory or MIT. Where those policies, procedures, or agreements (including collective bargaining agreements) conflict with the Code of Conduct, those policies, procedures, or agreements take precedence.

Adherence to the Code of Conduct is a condition of employment, and employees may be subject to disciplinary action for violations of the Code of Conduct, including dismissal. Additionally, for Subcontractors, Vendors, and Consultants, a violation of the Code of Conduct may lead to contractual action, including suspension or termination.

## III. COMPLIANCE PROGRAM

Lincoln Laboratory's Technology and Contracts Office (TCO) is responsible for creating and supporting a comprehensive ethics and compliance program. The office provides training to staff on this Code of Conduct. The TCO is responsible for investigating alleged violations of ethics-related regulations and conducting an annual review of the compliance program. See [A-56, Conflict of Interest](#) for more information about the program.

#### IV. REPORTING POTENTIAL VIOLATIONS

Every individual has the responsibility to promptly report any violation or suspected violation of law, Laboratory policy, or this Code of Conduct, and to fully cooperate with any subsequent investigation. Reporting may be accomplished by using any one of the numerous resources for reporting listed below. Retaliation in any way is prohibited against any individual who reports in good faith a suspected violation or who participates in an investigation.

##### A. Laboratory Leadership

When you have an ethics or Code of Conduct related question or concern, you are encouraged to discuss it with your supervisor or manager (if possible and practical). You may also directly contact the Laboratory's Senior Leadership in the Director's Office at (781) 981-7000. Questions about security may be addressed by the Laboratory's Chief Security Officer at (781) 981-7112.

##### B. Laboratory Ethics Office

You may reach the Assistant Laboratory Ethics Officer in the TCO at (781) 981-1589, or you may contact the Laboratory Ethics Officer in the MIT Office of General Counsel at (781) 981-7094.

##### C. Laboratory Ethics Hotline

The Laboratory maintains a hotline with 24-hour answering service through a third-party service provider called EthicsPoint. Allegations of wrongdoing can be reported to trained personnel that are not employed by MIT or Lincoln Laboratory. Any communication to the Ethics Hotline can remain anonymous upon request. Discussions must be carried out in a strictly unclassified manner. The Ethics Hotline can be reached at (866) 862-6166. The Ethics Hotline can also be accessed via the Lincoln Laboratory Intranet or reports may be filed online at <http://www.mitlincolnlaboratory.ethicspoint.com>.

##### D. Department of Defense Fraud Hotline

You may also call the Department of Defense Fraud Hotline at 1-800-424-9098; additional information about the DoD Fraud Hotline can be found at <http://www.dodig.mil/hotline/>.

##### E. Human Resources Department

The Human Resources Main Office can be contacted at (781) 981-7064.

##### F. Ombudspersons

The Ombudspersons are full-time employees of the Laboratory who are appointed by the Director to help resolve employee concerns in the workplace. More information can be found on the Laboratory Intranet at <http://llwww/Resources/Communications/Ombudspersons.pdf>.

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27 March 2013

Distribution: All Personnel