

Business Associates and Holiday Gifts

As the holiday season approaches, it is important to remember that company business should always be conducted in a manner that is free from the inference or perception that favorable treatment was sought, received or given on the basis of employees offering or accepting gifts. HII employees and members of their immediate families may not give gifts to or accept gifts from business associates, except as permitted by CO A203, Providing and Accepting Gifts, Entertainment & Hospitality (GEH).

What should I do if I receive a gift from a business associate that is not permissible under CO A203?

You must return it, unless special circumstances make the return impractical. Also, you should always notify the business associate of HII's gift policy. Questions concerning impractical returns such as perishable gifts or gifts of value should be forwarded to the Ethics and Business Conduct Office.

What should I say to the business associate if I am returning a gift?

Here is a sample note:

Thank you for your recent gift. While I appreciate the good intention of your gesture, it is an HII policy that employees cannot accept gifts such as this from our business associates. Therefore, I am returning your gift. Thank you for your goodwill.

What should I say to the business associate if I am unable to return the gift?

Here is sample note:

Thank you for your recent gift. While I appreciate the good intention of your gesture, it is an HII policy that employees cannot accept gifts such as this from our business associates. Since it would be impractical to return your gift, I have forwarded it to our Ethics and Business Conduct office for appropriate disposition. Thank you for your goodwill.

Supervisors/Foremen - Please share this message with employees who do not have computer access. Post it for employee review.