



DEPARTMENT OF DEFENSE
Defense Commissary Agency
Fort Lee, VA 23801-1800

DIRECTOR'S POLICY

Business Ethics Program

DP 500-06
July 27, 2011

General Counsel
OPR: DeCA/GC

1. PURPOSE. The Business Ethics Program provides key guidance on the core values that create a sense of who we are and what sets us apart from others. Adherence to these values enhances our long-term success by improving our ability to achieve our corporate objectives and implement our shared values.

2. POLICY STATEMENT.

a. The Defense Commissary Agency's (DeCA) Business Ethics Program is founded on the principles of integrity, honesty, and fairness in all of our dealings with our patrons, our co-workers, and our suppliers. These principles embody the essence of our service to the United States, the Department of Defense (DoD), and DeCA. All DeCA personnel are expected to demonstrate the highest moral principles and loyalty to country above loyalty to family, friends, or anyone else. Special favors or privileges may never be given to anyone, nor may special favors or privileges for ourselves, family members, or friends be sought or accepted. While many actions and activities are necessary to the conduct of our business, we must make certain that we always place the public's best interest above all else. It has been said that "appearance is everything," and we must ensure that the appearance of our actions is consistent with the public's expectations. We can never treat one business more favorably than another. While it is in the interest of businesses to gain access to us, we must ensure that we don't make it easy for one and impossible for the next. We must never imply that a business's offer or position may be affected for personally gratifying reasons or for anything other than our primary business criteria – the best value for our patrons.

b. We must ensure that our travels are necessary. Meetings at locations other than at the office must have a legitimate business purpose. If the meeting goals can be met through a phone call or a video teleconference, then we must use that method. All DoD trainings and meetings at offsite locations must be vetted through a DoD-mandated review process, and conference planning must follow the mandatory procedures in the Joint Travel Regulations. Selecting a training location that may create an appearance that we are vacationing at the taxpayer's expense at a hotel or resort may result in adverse publicity and less choice in the future. Following the mandatory DoD and Joint Travel Regulations procedures and asking a few common sense

questions – looking at the answers through the eyes of someone outside of DeCA – should reveal the correct answer.

c. People with integrity are principled, honorable, and upright in their dealings with others. They are consistent in their moral behavior and do not adopt an “end justifies the means” philosophy. Honest people are truthful, sincere, and candid. They do not mislead, act deviously, or misuse or disclose information learned in confidence. Fair people show a commitment to justice, equitable treatment, and tolerance. They do not take undue advantage of others’ mistakes or problems.

d. While encompassing standards of ethical conduct expected of all Federal employees, DeCA’s Business Ethics Program goes beyond those requirements and is a statement of business principles that comprise our core values and incorporate the legal requirements applicable to DeCA.

3. RESPONSIBILITY.

a. Every DeCA employee is responsible for implementing the DeCA Business Ethics Program. They must know, understand, and comply with the Standards of Conduct and the requirements of the law applicable to DeCA. They must contribute to an ethical attitude in the work place. When in doubt, they must seek help from their supervisor or the Designated Agency Ethics Official. They must always be on the lookout for unethical or illegal situations so they can avoid them or report them.

b. Supervisors at all levels have the added responsibility to lead by example. They do not subordinate “ethics” to meet an organizational goal. They encourage ethical conduct in the daily activity of their employees. They foster frank and open communication with those employees they supervise, free from the fear of reprisal. Supervisors provide guidance on how to avoid ethical problems and take appropriate actions to correct ethical deficiencies and violations.

c. DeCA personnel involved in the selection, acquisition, and sale of products have an additional responsibility of learning and knowing the laws, rules, and regulations that govern our activities. They must know what categories of goods are authorized, by law, for sale. They must know all of the special rules for acquiring brand name products, and they must know when the competition processes must be used and when they cannot. They must never be perceived as recommending a particular broker or distributor to a company seeking to do business with DeCA.

d. All DeCA employees represent the Agency when meeting with DoD and other Federal and non-Federal agencies and organizations, or interfacing with our patrons and business partners. Whether attending meetings with other agencies, or serving as the public face of DeCA when interfacing with patrons, business partners, the public, or the American taxpayer, they represent DeCA. As a representative of DeCA, they are expected to speak the Agency policy and not substitute their personal views above that policy. They are not authorized to commit the Agency to any position not previously approved by the appropriate level of DeCA supervision.

e. The General Counsel is responsible for the operation of the DeCA Business Ethics Program. The General Counsel will prepare ethics training materials for use at all levels.

4. EFFECTIVE DATE. This Policy is effective immediately.



Joseph H. JEU
Director