



SECRETARY OF DEFENSE  
1000 DEFENSE PENTAGON  
WASHINGTON, DC 20301-1000

FEB - 3 2023

MEMORANDUM FOR DESIGNATED AGENCY ETHICS OFFICIAL

SUBJECT: Ethics Obligations and Updated Screening Arrangement

This memorandum updates the screening arrangement I executed with the assistance of the Standards of Conduct Office to implement my ethics obligations. My obligations are set forth in the Ethics Agreement that I signed prior to my confirmation by the United States Senate for the position of Secretary of Defense, and the President's Ethics Pledge<sup>1</sup> of January 20, 2021. Specifically, this screening arrangement has been updated to account for the expiration of my two-year former employer recusals and supersedes the screening arrangement dated May 6, 2021.

It is my understanding that none of the restrictions described below will preclude me from participating in a personal or official capacity in any social, ceremonial, or other public affairs events. Similarly, when not taking any official action, I may be allowed to attend meetings and receive information regarding these organizations for situational awareness, without participating or providing substantive comment and direction. However, I will consult with an ethics official in the Standards of Conduct Office prior to doing so, as necessary. I will be mindful of not only the legal requirements that govern my conduct, but also of the appearances to ensure that the public has no reason to question my impartiality.

**ETHICS OBLIGATIONS**

Pursuant to the commitments I made in my Senate confirmation hearing, for **four years** from the date of my appointment as the Secretary of Defense, I will not participate personally and substantially in any particular matter where **Raytheon Technologies** is or represents a party to the matter unless I am granted a waiver.

While I do not expect that a waiver will be necessary, should an unanticipated circumstance arise that may warrant a waiver, I will consult with an ethics official in the Standards of Conduct Office and consider available alternatives before seeking any waiver or authorization under the ethics rules.

**UPDATED SCREENING ARRANGEMENT**

To ensure that I do not inadvertently participate in particular matters from which I should be recused, I am directing my Chief of Staff, Executive Secretary, Military Assistants, and other designated Administrative Assistants to screen all matters directed to my attention that involve outside entities, or that require my participation, to determine if **Raytheon Technologies** is a party to or represents a party to the matter.

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<sup>1</sup> Exec. Order No. 13989 (2021)



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If the screener determines that **Raytheon Technologies** is or represents a party to the matter the screener will refer the matter, without my knowledge or involvement, to the Deputy Secretary of Defense or other appropriate senior Department of Defense official for action or assignment. If the Deputy Secretary or alternate official believes my participation in the matter is important, the Deputy Secretary will contact an ethics official in the Standards of Conduct Office for further guidance.

I also direct each of my screeners to seek assistance from an ethics official in the Standards of Conduct Office if he or she is uncertain whether I may or should participate in the matter. For example, if **Raytheon Technologies** is not a party to the matter but is otherwise involved in the matter and my participation could cause an appearance concern.

The Chief of Staff will ensure that all members of my immediate office staff, to include the Executive Secretary, Military Assistants, and other designated Administrative Assistants receive a copy of this document as part of their onboarding process.

In consultation with ethics officials in the Standards of Conduct Office, I will revise and update this memorandum if warranted by changed circumstances, including changes in my financial interests, my personal or business relationships, or the nature of my official duties. The Standards of Conduct Office may issue additional guidance on standards and procedures to personnel implementing this screening arrangement.



cc:  
Deputy Secretary of Defense  
Chief of Staff, Secretary of Defense  
Chief of Staff, Deputy Secretary of Defense  
Executive Secretary  
Immediate Office Staff (Secretary and Deputy Secretary of Defense)  
DoD Standards of Conduct Office