

MEMORANDUM

TO: All Government Agencies & Departments

FROM: Cindy L. Richardson, Director of Personnel



DATE: March 26, 2025

SUBJECT: Prohibition on Receipt of Compensation, Rewards, Gifts, or Other Benefits

The purpose of this memorandum is to remind all employees within the Government of the Virgin Islands (GVI) of the strict prohibition of receiving any form of compensation, reward, gift, or other benefit in connection with their official duties. This prohibition is reinforced by Executive Order No. 540-2025, attached for your convenience, which updates the Code of Ethical Conduct for all officers and employees of the GVI.

Prohibited Conduct

Under the provisions of Executive Order No. 540-2025 and existing laws, rules, and policies, employees of the Government of the Virgin Islands **shall not solicit, accept, or receive any form of compensation, monetary reward, gift, favor, or benefit**—whether directly or indirectly—that:

1. Is given in exchange for, or as a result of, the performance of official duties.
2. Could reasonably be interpreted as an attempt to influence an employee's actions or decisions in their official capacity.
3. Creates a conflict of interest, perceived or actual, in the discharge of government responsibilities; or
4. Violates any applicable law, rule, or policy related to government ethics, conflicts of interest, or financial disclosure.

Applicability & Compliance

This prohibition applies to all employees, regardless of position, classification, or appointment status, including those in classified, exempt, temporary, and contract positions.

Employees must exercise caution in situations where gifts, gratuities, or incentives are offered by individuals, businesses, or organizations that engage in transactions with the government. Any violations of this prohibition may result in disciplinary action, up to and including termination of employment and potential legal consequences.

Exceptions

This memorandum does **not** prohibit:

- Ceremonial gifts (e.g., certificates of appreciation, promotional items, or awards given publicly for recognition).
- Gifts received from personal friends or family members, provided they are not connected to an employee's government role.
- Benefits or compensation expressly authorized by law, policy, or a collective bargaining agreement.

Public Awareness & Agency Participation

To ensure that both employees and the public are informed, we ask that agencies post the attached flyer in public areas such as lobbies, offices, agency websites and other locations where it may help raise awareness. Educating the public is key to preventing any unintended violations and reinforcing our ethical guidelines.

Reporting Violations

Employees who become aware of any potential violations should report the matter for review and appropriate action. All reports should be made via the [Ethical Reporting](#) form on the Division of Personnel website. (dopusvi.org -- Employees – Documents and forms—Ethical Reporting)

All agencies and employees are expected to familiarize themselves with and adhere to the provisions of [Executive Order No. 540-2025](#) and uphold the highest standards of integrity, transparency, and ethical governance. The updated GVI Ethical Code of Conduct can also be found in the [GVI Employee Handbook](#).

For further guidance or clarification, please contact the Division of Personnel.