

ETHICS POLICY

Section 1. Applicability¹.

This policy applies to the Governor, Lieutenant Governor and all employees of the Office of the Governor (collectively “Employee” or “Employees”).

Section 2. Conflicts of Interest.

A conflict of interest exists when a personal interest or belief interferes with an Employee’s ability to exercise independent and impartial judgment in fulfilling his or her job duties. Conflicts of interest exist on a continuum, beginning with day-to-day job responsibilities, and involve a variety of situations and circumstances. Employees must take great care to avoid conflicts of interest or even the perception of a conflict of interest.

Conflicts of interest may exist in the following situations or circumstances²:

- Having or acquiring a controlling interest in a business or entity entering, or in the process of entering, into a contract, sale, lease, transfer, purchase or grant with the State, a Cabinet or other State agency or a policy area that is within the Employee’s scope of duties and responsibilities;
- Exerting influence that unfairly benefits third parties in transactions involving a State agency or policy area within the Employee’s scope of duties and responsibilities;
- Advocating for, or causing the advancement, appointment, employment, promotion, or transfer of an Employee’s family member to an office or position within a State agency.
- Accepting or continuing coexistent employment, if such employment conflicts with the Employee’s position with the Governor’s office; and,
- Accepting or continuing a position as a corporate officer or director, if such service conflicts with the Employee’s position with the Governor’s office.

Section 3. Gifts and Honoraria.

No Employee may accept, directly or indirectly, a gift with a value exceeding \$50.00 from any person, business or entity. If a gift in an amount greater than \$50.00 has been accepted, it must be reported to the Ethics Officer and returned to the donor. If it is unduly burdensome to return the gift to the donor, it must be transferred to a charitable organization.

No gift of any value may be accepted if offered with the intent to directly or indirectly influence the exercise of official action.

¹ This Ethics Policy is intended to supplement the Industrial Commission Code of Ethics.

² The examples provided above are intended to be illustrative, not exhaustive.

An Employee, their spouse, children and members of their household are not prohibited from exchanging gifts between close friends or family members. Circumstances must indicate a personal rather than business relationship. No disclosure is required for a gift received under the terms of this paragraph.

A plaque, trophy or other item that is substantially commemorative in nature, and intended for presentation, is not considered a gift and may be accepted.

Honoraria may not be accepted for work activities performed by an Employee within the scope of his or her duties and responsibilities.

Section 4. Expenses.

From time-to-time, Employees may have opportunities to participate in meetings related to official or professional duties, where actual and reasonable expenses related to travel, lodging, and registration are paid to facilitate attendance. Within 30 days after the meeting, Employees should report expenses, by date, location and sponsor, in writing, to the designated Ethics Officer.

Section 5. Access to the Governor's Office.

All constituents shall be afforded fair and equal access to the Governor's office, to express their personal concerns and ideas regarding State programs and policies without regard to their political affiliation, sophistication, or affluence.

Lobbyists requesting a meeting with the Governor's office will be encouraged to bring a principal of his or her client to the meeting.

Section 6. Political Activities.

Employees are permitted to: a) express their opinions about and support for political issues and candidates; b) participate in political activities; c) wear political badges/buttons and d) display political posters, outside of working hours. If a political activity is scheduled during normal business hours, the Employee may attend if he or she takes annual leave or attends the activity during a break.

Employees may not solicit or accept campaign contributions in a State-owned building or office, unless the solicitation occurs in a State-building specifically rented for a campaign fundraiser.

All Employees are encouraged to vote.

Section 7. Ethics Officer.

General Counsel is designated as the Ethics Officer for the Office of the Governor. The Ethics Officer shall maintain records related to reports received under this policy and take appropriate measures to ensure that Employees are familiar with applicable ethics law and policies.

This policy may be amended at any time, without prior notice.