

SEAN SCANLON
STATE COMPTROLLER

TARA DOWNES
DEPUTY COMPTROLLER



STATE OF CONNECTICUT
OFFICE *of the* STATE COMPTROLLER
165 Capitol Ave.
Hartford, CT 06106

POLICY OF ETHICAL CONDUCT

Employees of the Office of the State Comptroller ("OSC") are expected to maintain high standards of honesty, integrity and impartiality. As the constitutional fiscal office of the state, employees of the OSC hold positions of substantial responsibility and public trust and this is to assure the proper discharge of duties and the confidence of Connecticut citizens in State Government.

The State Code of Ethics for Public Officials and State Employees covers state officials and state employees. The ethical rules are contained in Connecticut General Statutes Sections 1-79 through 1-90.

Employees receive a copy of the "**Guide to the Code of Ethics for Public Officials and State Employees**" at initial employment orientation, and as is necessary and appropriate. A copy of the guide, which is prepared each year by the Office of State Ethics, can be found at:

<https://portal.ct.gov/Ethics/Public-Official-and-State-Employees-Information/Public-Official-and-State-Employee-Information> .

This Ethics Policy is intended as a general guide in determining what conduct is prohibited so that such prohibited conduct may be avoided. All OSC employees are expected to adhere to the provisions of the Code of Ethics and it is assumed that all OSC employees have read and agreed to adhere to the code. Alleged violations of the State Code of Ethics will subject the employee(s) to investigation and possible disciplinary action.

GENERAL CONDUCT:

- OSC Employees should perform their official duties at all times with fairness and impartiality.
- OSC Employees are prohibited from knowingly using his/her public office or position for the purpose of financially benefiting him/herself, an immediate family member, an outside employer, or a business with which he/she is associated.
- OSC Employees shall not disclose or use confidential information gained in state service except as permitted by law. "Confidential Information" is information not generally available to the public.

- OSC Employees may not use any resources of the OSC for unauthorized purposes. These resources include, but are not limited to, copy machines, long-distance telephone calls, fax machines, supplies, the mail system, and computers.
- OSC employees may not campaign for a candidate for political office or engage in political activity while on duty at the OSC; use state funds, supplies, equipment, vehicles or facilities to promote a candidate or party; or use their state position to directly or indirectly influence any political process.

GIFTS:

- OSC Employees are prohibited from accepting gifts (as defined in the Code of Ethics) from anyone: (1) doing business with the state; (2) seeking to do business with the state; or (3) known to be a registered lobbyist or lobbyist's representative.
- A gift is defined as anything of value that you (or in certain circumstances a member of your family) directly and personally receive *unless* you provide consideration of equal or greater value (e.g., pay for the item).
- A gift does not include: (1) food and drink totaling less than \$50 per person in a calendar year if consumed on occasions at which the individual providing the food or drink is present; (2) items valued at \$10 or less (not to exceed an aggregate of \$50 per year); and (3) ceremonial awards costing less than \$100.
- Gifts to and from subordinates and supervisors are limited to \$99.99 per gift, except where the gift is a "major life event". Where the gift is given to celebrate a major life event, no monetary limit applies.

CONFLICT OF INTEREST:

- No OSC employee shall have, directly or indirectly, an interest in any business or enterprise doing business with the State that could cause or create the appearance of a conflict with, or influence the performance of, the employees' duties with the OSC.
- No OSC employee shall willfully or knowingly, in his/her state position or duties, solicit or accept anything of value, including a gift, loan, political contribution, reward, or promise of future employment, based on an understanding that one's official action will be influenced.
- No OSC employee shall accept other employment which is in substantial conflict with the proper discharge of his or her official duties or which could result in the disclosure of confidential information gained in state service. Any OSC employee who is engaged or may be engaged in an employment relationship or business partnership with another person, firm, organization, business entity or corporation shall notify the **OSC's Ethics Liaison, Yamuna Menon**, in writing at yamuna.menon@ct.gov, of their prospective or actual employment or business partnership.
- No OSC employee, their family members (as defined by the Code of Ethics), and businesses owned or controlled by an OSC employee or their family member, may enter into a contract


with the State valued at \$100 or more unless the contract has been awarded through an open and public process.

- No OSC employee may accept any fee or honorarium given in return for a speech or appearance made or article written in the employee's official capacity.
- OSC Employees may receive Necessary Expenses from regulated or non-regulated donors (as defined in the Code of Ethics) if the employee attends an event in his/her official capacity and is an active participant in the event. Necessary Expenses include: travel; lodging for the nights before, during and immediately following the event; meals; and related conference expenses. Necessary expenses do not include payment for family members or guests or entertainment expenses. Expenses for out of state travel must be reported to the Office of State Ethics within 30 days of receiving payment or reimbursement by filing an ETH-NE form. The form is not required if your necessary expenses were paid by the federal government or by another state government.

POST-STATE EMPLOYMENT:

- Lifetime Bans:
 - OSC employees shall not disclose or use Confidential Information learned during the course of your state service for anyone's financial gain.
 - OSC employees shall not represent anyone (other than the State) concerning any matter in which (1) they participated in personally and substantially while in state service; and (2) the state has a substantial interest.
- One-Year Bans:
 - OSC employees may not represent their new employer for compensation before the OSC for a period of one year after leaving state service.
 - OSC employees who participated substantially in, or supervised, the negotiation or award of a State contract valued at \$50,000 or more shall not accept employment with a party to the contract for one year after leaving state service

If you have any questions regarding the OSC Ethics Policy or compliance with the State of Connecticut Code of Ethics for state employees please contact **OSC's Ethics Liaison, Yamuna Menon**, at (860) 702-3312 or yamuna.menon@ct.gov.



Sean Scanlon
State Comptroller

2/1/23

Date

