

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, and as employees of the OSC hold positions of substantial responsibility and public trust, 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 employees (Connecticut General Statutes beginning at Section 1-79).

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-O official-and-State-Employee-Information.

This Ethics Policy is intended as a general guide to determine 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 Code will subject the employee(s) to investigation and possible disciplinary action.

### **GENERAL CONDUCT:**

- OSC employees should always perform one's official duties with fairness and impartiality.
- OSC employees are prohibited from using one's public office or position for the purpose of financially benefiting oneself, an immediate family member, an outside employer, or a business with which one 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 one's state position to directly or indirectly influence any political process.

### **GIFTS:**

- OSC employees are prohibited from knowingly accepting gifts (as defined in the Code of Ethics) from anyone who is: (1) doing business with the state; (2) seeking to do business with the state; (3) a prequalified building contractor under General Statutes § 4a-100, or (4) 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, among other things: (1) food and drink totaling less than \$50 per person in a calendar year if consumed on occasions at which the person providing the food or drink (or the person's representative) 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 superiors (i.e., anyone up or down the chain of command) are limited to \$99.99 per gift, unless the gift is for a "major life event," in which case the limit is \$1,000. "Major life event" is defined to mean "a ceremony commemorating an individual's induction into religious adulthood such as a confirmation or bar mitzvah; a wedding; a funeral; the birth or adoption of a child; and retirement from public service or state employment."

### **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 solicit or accept anything of value, including, but not limited to, a gift, loan, political contribution, reward, or promise of future employment, based on an understanding that one's official action would be or had been influenced thereby.
- No OSC employee shall accept other employment that will impair one's independence of judgment as to one's official duties, or that will require or induce one to disclose 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 (OSC General Counsel)**, in writing at [yamuna.menon@ct.gov](mailto:yamuna.menon@ct.gov), of their prospective or actual employment or business partnership.
- No OSC employee, or member of the employee's immediate family (as defined by the Code of Ethics), or "business with which he [or she] is associated" (as defined by the Code of Ethics) 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 restricted or non-restricted donors (as defined in the Code of Ethics) if the employee attends an event in their official capacity and is an active participant in the event. Necessary Expenses include non-lavish travel; lodging for the nights before, off, and immediately after the event; meals; and related conference expenses. Necessary expenses do not include payment for family members or guests or entertainment expenses. Expenses for lodging and/or 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 particular 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 anyone (including a 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, and signed by the State within their last year of state service, 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 (OSC General Counsel)**, at (860)702-3312 or [yamuna.menon@ct.gov](mailto:yamuna.menon@ct.gov).

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Sean Scanlon  
State Comptroller

4/2/26

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Date

