

The Connecticut Lottery Corporation’s (“CLC”) mission is to raise revenue in support of the various programs and services of the State of Connecticut by offering products to our players that are fun and entertaining and by ensuring the public trust through integrity and honesty.

To maintain the public trust and in accordance with State law, CLC has adopted this Ethical Conduct Policy (the “Policy”) which establishes, promotes and demands the highest professional standards of ethics from its employees. Accordingly, it is essential that all CLC employees perform their duties with integrity, honesty, impartiality and fairness, while avoiding the appearance of impropriety in their roles as public servants and never using their position or power for personal gain.

This Policy serves as a guide and assists employees in identifying and avoiding prohibited conduct; however, it is not an all-inclusive list of prohibited conduct. The Policy is intended to supplement not only the Code of Ethics for Public Officials (“State Code of Ethics”) as set forth in Chapter 10 of the Connecticut General Statutes, but other applicable sections of the Connecticut General Statutes, and the regulations of the Office of State Ethics. All employees are expected to become familiar with and abide by the State Code of Ethics, as well as this Policy. The Guide to the Code of Ethics for Public Officials and State Employees, is an annual, plain language guide to the State Ethics Code, and is attached to this Policy and incorporated herein by reference. Both the State Code of Ethics and the guide may be accessed on the Office of Governmental Accountability within the division of the Office of State Ethics. Please visit [www.ct.gov/ethics](http://www.ct.gov/ethics) and click “Statutes and Regulations” for the State Code of Ethics and “Public Information/Publications” for the guide.

Members of CLC’s Board of Directors (“Board Members”) are governed by the Code of Ethics for Public Officials, as referenced above. In addition, Board Members are bound by paragraphs #3 and #11 of this policy which speak to Confidential Information and Gaming Participation, respectively.

## 1. **Definitions**

The following terms, as utilized in this context are defined as follows:

### **CLC**

The Connecticut Lottery Corporation

### **Employee**

Any person who is employed by CLC to work on either a full, part-time or temporary basis.

### **Financial Interest**

Any interest that yields, or has the potential for yielding, directly or indirectly, a monetary or other material gain or benefit.

**Immediate Family**

Persons residing in the same household related by blood, marriage or adoption, or persons engaged in a domestic partnership or civil union.

**Retailer**

A person or business licensed to sell lottery tickets on behalf of CLC.

**Vendor**

Person or business who provides or proposes to provide goods or services to CLC pursuant to a contract, excluding any employee of CLC, a Retailer, or State Agency or instrumentality thereof.

2. **Ethics Liaison Officer**

CLC’s General Counsel or its designee serves as CLC’s Ethics Liaison Officer (“ELO”). This position is responsible for coordinating appropriate training programs, monitoring agency policies relevant to ethics compliance, and serves as a resource for ethics guidance and advice. The ELO will not provide legal advice regarding ethics issues but will refer an employee to the Office of State Ethics when necessary, or seek such legal advice on the employee’s behalf. The ELO will also serve as the Ethics Compliance Officer and liaison to vendors to ensure that they are aware of the relevant restrictions under the Code and this policy.

Each year the ELO, in conjunction with CLC’s Director of Human Resources, reviews and disseminates this Policy and the current Guide to the Code of Ethics for Public Officials and State Employees to all employees. The Policy and Guide to the Code of Ethics for Public Officials and State Employees should be reviewed by each employee to ensure awareness and compliance with any changes. The ELO shall ensure that the Policy is posted on CLC’s website and is responsible for periodically distributing advisory opinions, enforcement actions or rulings that may be of particular relevance to CLC employees. The ELO provides ethics training at least annually to agency personnel involved in contractor selection, evaluation and supervision.

3. **Confidential Information**

In the course of their employment or association with CLC, Board Members and employees may have access to confidential information (“Confidential Information”). Confidential Information is defined as, any information not generally available to the public, which shall not be disclosed under any state or federal law, or which may be exempt from disclosure under the Freedom of Information Act. This includes, but is not limited to, personal information which is capable of being associated with a particular individual through one or more identifiers such as a social security number, driver’s license number, federal employer’s identification number, medical information, tax registration number, health insurance identification number. It also includes proprietary information related to CLC’s sales, promotion and marketing plans, as well as information related to security plans or programs. Confidential Information may be contained in any form (e.g. written, photographic, tape recorded, or orally transmitted (e.g. conversations or negotiations)).

No Board Member or employee shall disclose, for any reason, any Confidential Information acquired in connection with his/her employment, official duties or association with CLC. Further, no Board Member or employee shall use or permit the use of such Confidential Information to obtain financial gain for him/herself, another person, or business with which he/she is associated.

CLC and its employees have an obligation to secure and properly dispose of Confidential Information. Consequently, only those employees that have a business “need to know” shall have access to Confidential Information and shall not remove such information from CLC property for any reason other than the performance of assigned duties. Additionally, employees and Board Members shall ensure that all documents containing Confidential Information, whether written or electronic, are properly destroyed when no longer necessary for business purposes or required by record retention guidelines.

Should an employee or Board Member be uncertain as to whether information may be disclosed, he/she/they shall discuss the issue with CLC’s ELO.

4. **Gifts**

CLC employees are prohibited from accepting gifts of any kind from anyone (1) doing business with CLC (2) seeking to do business with CLC (3) known to be a registered lobbyist or lobbyist’s representative or (4) known to be a pre-qualified construction contractor for large state contracts with the Department of Administrative Services. This includes all retailers and vendors. This prohibition extends to the acceptance by a CLC employee of goods or services provided to CLC by any such person or entity for use on CLC property, to support CLC employees’ participation at an event, or otherwise to facilitate CLC actions or functions.

A list of registered lobbyists can be found on the Office of State Ethics’ website. Employees can determine whether a vendor is on the Department of Administrative Services’ (“DAS”) prequalification list by checking the DAS website.

Gifts generally refer to any gift, discount, gratuity, payment or other thing of value that is not offered on the same terms to the public at large. Please note that certain items are excluded from the definition of “gift” under the law.

No CLC employee, nor a member of their immediate family, shall accept any gift costing one hundred dollars (\$100.00) or more from a CLC Board Member, supervisor in the chain of command, or subordinate. No CLC employee shall give any gift in violation of these restrictions.

While the State Code of Ethics includes certain exemptions for gifts of small value, including food and drink, it is the policy of CLC that CLC employees, unless previously authorized by the President, are prohibited from accepting any gifts, including food and drink, from persons in the categories identified above or from accepting gifts which are otherwise given because of an employee’s position at CLC. Any deviation from this provision requires the prior approval of CLC’s President and Chief Executive Officer (“President and CEO.”) CLC employees are also prohibited from contracting for goods or services, for personal use, with any person

doing business with or seeking to do business with CLC, unless it is on the same terms that such goods or services are readily available to other members of the public.

Finally, no CLC employee shall counsel, authorize, or otherwise sanction any action that violates the gift restrictions described above.

5. **Conflict of Interest**

An employee is prohibited from engaging in any business or transaction or having a financial interest, direct or indirect, which is incompatible with the proper discharge of his/her official duties or would tend to influence his/her judgment or action in the performance of his/her official duties.

A potential conflict of interest exists when the discharge of official duties would require an employee to take any action that would affect his/her financial interest, or the financial interest of a relative or business with which he/she is associated. The employee may not take such action.

A substantial conflict of interest exists when an employee has reason to believe or expects that he/she, his/her relative, or an associated business will derive a direct monetary gain or suffer a direct monetary loss by reason of his/her official activity. The employee may not take such action.

6. **Disclosure**

When a potential or substantial conflict of interest exists, the employee shall complete CLC's [Inquiry and Disclosure Form](#). The employee is required to summarize the matter requiring action and the nature of the actual or potential conflict to his/her immediate supervisor. The supervisor shall then submit the completed Inquiry and Disclosure Form to CLC's ELO and the ELO will seek advice from the Office of State Ethics.

7. **Outside Employment**

No employee shall accept other employment which will influence his/her judgment regarding his/her responsibilities, official duties or employment, or require or induce him/her, to disclose Confidential Information acquired during his/her official duties or employment with CLC. In addition, outside employment is barred if the outside employer can benefit from CLC's official actions, or the outside employment interferes with the employee's normal working hours at CLC.

An employee who wishes to undertake other employment while remaining an employee of CLC shall do so only with the approval of CLC's President and CEO. The employee shall submit an [Inquiry and Disclosure Form](#) to the ELO who shall review the matter and make a recommendation to the President and CEO. An employee shall not use state time, resources, equipment or his/her position to promote other employment.

In addition, an employee, his/her immediate family members, and/or a business with which an employee or his/her family member is associated may not enter into a contract with CLC (or any state agency) valued at \$100 or more, unless the contract has been awarded through an open and public process.

8. **Statement of Financial Interest**

The President and CEO, CLC senior managers and any other employee that plays a substantive role in reviewing, awarding and monitoring CLC contracts shall file statements of financial interest with the Office of State Ethics in accordance with the requirements of the State Code of Ethics and Executive Order No. 1, issued by Governor M. Jodi Rell.

9. **Employment of Relatives**

To prevent conflicts of interest and to ensure that CLC's hiring practices are fair and impartial, relatives of employees shall not be considered for employment with the CLC. Further, if a relative, romantic or domestic relationship is established between employees during employment, the employees involved shall immediately notify their department head(s) of their relationship.

10. **Political Activity**

All CLC employees, except for managers, are classified state employees. The political activities of classified employees are governed by Connecticut General Statutes § 5- 266a, and the applicable regulations, as well as General Letter No. 214-D, issued by the Department of Administrative Services.

In general, a classified employee of CLC is permitted to:

1. Vote as he/she chooses, express his/her opinion on political subjects and candidates, and participate actively in political subjects, candidates, political management and campaigns. This may include membership and holding office in a political party, campaigning for a candidate by making speeches, soliciting votes in support of or opposition to a candidate, and making contributions of time or money to a party or candidate.
2. Become a candidate for state or local office, under state law. An employee who is a candidate for state office or for full-time municipal office is required by Connecticut General Statutes §5-266a(c) to notify the President and CEO of CLC within thirty (30) days of nomination, by completing the CLC's [Inquiry and Disclosure Form](#).

While CLC does not expect employees to refrain from political discussion, employees must remember that work place discussions must be reasonable, and respectful of others feelings and must be consistent with the CLC's Anti-Harassment Policy.

However, a classified employee of CLC is prohibited from:

1. Using his/her official authority or influence to interfere with or affect the result of an election or a nomination for office; and
2. Coercing, commanding or advising, either directly or indirectly, a state or local officer or employee to contribute anything of value to a party or person for political purposes; and
3. Engaging in any political activity while on duty or within any period during which such employee is expected to perform services for which he/she receives compensation from the CLC. This includes wearing a political or campaign button or clothing while on official CLC business; and
4. Using state funds, supplies, equipment, vehicles or facilities to support or oppose a political candidate, party or issue; and
5. Holding elective municipal or state office and simultaneously being compensated by CLC or other state agency. Therefore, any employee who accepts an elective state office must resign from his/her position with CLC. Any employee who accepts elective full-time municipal office shall be granted a personal leave of absence without pay from state employment for not more than two consecutive terms of office for a period of four years, whichever is shorter.

By virtue of this Policy, the political activity of managers shall be governed by the aforementioned rules for classified state employees, except that unclassified managerial employees shall seek the advance permission of the Personnel Committee of the Board of Directors prior to (i) becoming a candidate for state or local office; (ii) volunteering for a political campaign or (iii) otherwise being retained in any manner to assist a political candidate running for office. This notification does not extend to making political donations. All employees should seek advice from the ELO or the State Elections Enforcement Commission concerning any limitations on political contributions imposed by state or federal law.

#### 11. **Gaming Participation**

To avoid the appearance of impropriety and in accordance with Connecticut General Statutes § 12-811(b), all Board Members and employees of CLC, or member(s) of their immediate family, as defined in this policy, are prohibited from purchasing any lottery tickets issued by CLC or redeeming or sharing any prize on CLC games. This prohibition applies to Powerball and to Mega Millions tickets purchased or redeemed in Connecticut and any other state or jurisdiction in which sold.

Board Members, CLC employees and their immediate family members may participate in other forms of legalized gambling regulated by the Division of Special Revenue (i.e. Off-track Betting, Foxwood's Casino, Mohegan Sun Casino, bingo and sealed tickets).

#### 12. **Future Employment**

Employees leaving CLC are required to comply with the State Code of Ethics provisions pertaining to post-state employment, which are commonly known as the "revolving door" provisions. For example, there are restrictions on accepting employment with a party to certain contracts if the employee was involved in the negotiation or award of the contract,

and restrictions on representing other parties before CLC during the one-year period following departure from state service.

An employee should contact the ELO if he/she has any questions regarding these provisions, prior to accepting other employment.

13. **Compliance and Enforcement**

All employees are expected to become familiar with and comply with this Policy, as well as the State Code of Ethics. Failure to comply with either of the above referenced policies may result in disciplinary action, up to and including dismissal.

The Office of State Ethics determines what constitutes an ethics violation under the State Code of Ethics. Unless the Office of State Ethics makes a finding of probable cause, a complaint alleging a violation is kept confidential except upon request of the alleged violator.

Use your voice and escalate your concerns. Promptly report any potential or actual violation of any applicable policy, law or regulation. Should you suspect any violation of the State Code of Ethics, you may: (1) contact the Office of State Ethics at (860)-263-2400; (2) contact the CLC Ethics Liaison Officer; (3) speak with the CLC Human Resources Department; or (4) reach out to your supervisor. The President and CEO, Vice President(s), and those designated to sign contracts in the President and CEO's absence are **required** to notify the Office of State Ethics if there is reasonable cause to believe that a person (including but not limited to state contractors) has violated any law or regulation relating to ethics

These reporting options are not exclusive. Any employee is also entitled to report confidentially, any suspected illegal conduct to any law enforcement agency as the employee deems appropriate. Retaliation or adverse action against an employee who reports a matter to law enforcement, in good faith, is strictly prohibited. Ethics reporting obligations do not in any way preclude an employee from also reporting a matter of concern to law enforcement. An individual who provides information pursuant to this section will be afforded whistle blower protections under applicable state and federal laws.

Employees should also be aware that Public Act 08-3 permits state courts to revoke or reduce the pension of any employee who is convicted of or pleads guilty or nolo contendere to any crime related to state office, specified as embezzlement of public funds, felonious theft from the state, bribery in connection with state service or committing of any felony whereby the employee receives or attempts to receive profit, gain or advantage due to his or her position. In addition, failure to report bribery is also a crime.

14. **Dissemination of the Ethical Conduct Policy**

This Policy as well as the current Guide to the Code of Ethics for Public Officials and State Employees will be provided to Board Members, and all new employees upon hire.

Distribution: All CLC Employees and Board Members

Special Instructions: Supersedes Ethical Conduct Policy revised 1/15/2012