

ETHICS AND CONDUCT POLICY

Effective 12/02/2007, Last Revised 6/22/2023

As public servants, public officials and employees shall serve in a manner that fosters public trust, integrity, equity, and transparency. All officials and employees must be fully informed of their duty to adhere to the highest ethical standards for the most effective and efficient operation of City of Columbus government. These guidelines address conduct and work performance to prevent undue influence, conflicts of interest, favoritism, bias, and the appearance of impropriety.

All City of Columbus officials and employees shall be provided with a copy of the current Ethics and Conduct Policy, as well as a copy of the Ohio Ethics Law and related statutes, and shall acknowledge receipt in writing as required by Section [102.09\(D\)](#) of the Ohio Revised Code. All officials and employees shall be required to sign a Pledge of Ethical Conduct that will be maintained in their human resource department's personnel files.

PROHIBITED CONDUCT

All public officials and employees must perform their duties in conformity with the Ohio Ethics Laws, as interpreted by the Ohio Ethics Commission, and shall not engage in prohibited conduct, which includes, but is not limited to, the following:

- (1) **Gifts:** Solicitation or acceptance of [anything of value](#) from an improper source, including, but not limited to, any person, corporation, or other party that is doing business, or seeking to do business with, regulated by, or has interests before, the City of Columbus;
- (2) **Outside Employment:** Solicitation or acceptance of employment from an improper source, unless the exception recognized by the Ohio Ethics Commission is satisfied. This exception requires any public employee seeking new or outside employment to do the following:
 - a. Inform their supervisor and obtain permission from that supervisor to completely withdraw from any matter involving the party from whom they are seeking or have accepted employment;
 - b. The supervisor granting the public employee permission to withdraw must either handle the matter themselves, or assign it to another employee who is superior to, or on the same level as, the public employee who has withdrawn; and
 - c. If the public employee is seeking a second job, the second job must not conflict in any way with the performance of the duties of their current job;
- (3) **Conflict of Interest:** Use of one's public position to obtain benefits for an official or employee, a family member¹, household member, or anyone with whom the official or employee has a business or employment relationship²;
- (4) **Supplemental Compensation:** Payment or acceptance of any form of compensation for personal services rendered on a matter before any board, commission, or other body of the City of Columbus, unless the official or employee qualifies for the exception, and files the [statement](#), described in Section

¹ A "family member" includes the following relatives, regardless of where they reside: spouse; children (whether dependent or not); siblings; parents; grandparents; and grandchildren. It also includes any other person related by blood or marriage and living in the same household.

² A "business associate" includes any individuals, companies, or organizations with which the official is acting together to pursue a common business purpose. E.g. partners in a partnership; co-owners of a business; outside employer; or co-member of an LLC.

[102.04\(D\)](#) of the Ohio Revised Code;

- (5) **Public Contracts:** Holding or benefitting from a contract with, authorized by, or approved by, the City of Columbus, unless otherwise permitted through a statutory exception; the Ethics Laws exempts certain limited stockholdings and contracts objectively shown as the lowest cost services, if all criteria under Revised Code Section [2921.42](#) are met;
- (6) **Nepotism or Influence Peddling:** Voting, authorizing, recommending, or in any way using one's position to secure approval of a City of Columbus contract including employment or personal services in which an official or employee, a family member, or anyone with whom an official or employee has a business or employment relationship, has an interest;
- (7) **Honoraria:** Solicitation or acceptance of honoraria, pursuant to sections [102.01\(H\)](#) and [102.03\(H\)](#) of the Revised Code;
- (8) **Revolving Door or Post-Employment:** During public service, and for one year after leaving public service, representing any person or entity, in any manner, before any City of Columbus body, with respect to a matter in which an official or employee personally participated while serving with the City of Columbus;
- (9) **Confidential Information:** Using or disclosing confidential information protected by law, unless appropriately authorized;
- (10) **Use of City of Columbus Brand:** Using, or authorizing the use of, one's title, the City of Columbus, or the city's acronym or logo in any way that suggests endorsement of a product or business, favoritism, bias, or impropriety by a City of Columbus official or employee; and
- (11) **Political Activity:** Public officials and employees shall not engage in political activity that is prohibited by Ohio law, the Columbus City Charter, or the Columbus City Code³.

WHAT DOES "ANYTHING OF VALUE" MEAN?

In general, it is the value and source combined that determines whether a gift, meal, ticket, entertainment, or other item is permissible or prohibited. The Ohio Ethics Commission describes gifts of "substantial value" and from an "improper source" as those that include, but are not limited to:

- Meals at expensive restaurants;
- Entertainment activities such as exclusive golf outings and season tickets to the games of a professional sports team;
- Jewelry;
- Discounts on major consumer items; and
- Travel, meal, and lodging expenses.

Gifts that are *not* of substantial value are considered to have "nominal or de minimis" value *(unless cumulative), such as promotional items or an inexpensive meal, and may be permitted even if received from an improper source provided they are not offered in return for the performance of public duties.

However, accepting an item of nominal or de minimis value may create an appearance of impropriety, even if accepting the gift is not a violation of Ohio Ethics Law. **When in doubt, a public official or employee's most appropriate course of action is to pay their own way or decline a gift or any other item that may violate**

³ Ohio Revised Code Section [124.57](#); Columbus City Charter Section [156](#); Columbus City Code Section [161.05](#).

Ohio Ethics Law or that could potentially give rise to an appearance of impropriety.

ETHICS TRAINING & FINANCIAL DISCLOSURE

Public officials or employees designated by the Office of the Mayor, with positions that involve significant administrative, financial, policy, and related matters, will be required to complete and timely file a financial disclosure statement with the Chief Ethics Officer and attend ethics education and training on an annual basis. Mandatory ethics education and training will be required for all new City of Columbus employees within ninety (90) days of hire and annually thereafter during each year of City employment.

GUIDANCE

All public officials and employees in the City of Columbus may contact the Chief Ethics Officer or the City Attorney's Office for advice and assistance regarding the application of the Ohio Ethics Law and related statutes. The Ohio Ethics Commission also provides advice and guidance on ethics and can be contacted at (614) 466-7090 or online at <http://www.ethics.ohio.gov>.

PENALTIES

Failure on the part of any public official or employee to abide by the ethical standards and disclosure requirements in accordance with this policy, or to comply with the Ohio Ethics Law and related statutes, the Columbus City Charter or the Columbus City Code, may result in disciplinary action, up to and including termination, as well as any potential civil or criminal sanctions under the law.