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ETHICS/CONFLICT OF INTEREST POLICY

Officials and employees are expected to use good judgment, adhere to high ethical standards, and avoid situations that create an actual or perceived conflict between their personal interests and those of the organization. The City of Findlay “City” needs to know that the transactions employees participate in are ethical and within the law, both in letter and in spirit.

The City recognizes that holding public office or employment is a public trust, for which ethics has a particular significance. The guiding principle of this Ethics Policy is simply to know right from wrong; act in accord with what is right; and to avoid even the appearance of impropriety. Our duty as a public servant is to always act in the public interest.

Conflicts of interest or unethical behavior may take many forms including but not limited to:

1. The acceptance of gifts from vendors, potential vendors, or the public. Gifts may only be accepted if they have a nominal retail value and only on appropriate occasions (for example, a holiday gift).
2. Employees are cautioned not to accept any form of remuneration or nonbusiness-related entertainment, nor may employees sell to third parties any information or materials acquired from the City. Employees may engage in outside business activities provided such activities do not adversely affect the organization or the employee’s job performance and the employee does not work for a vendor or customer.
3. Employees are prohibited from engaging in financial participation, outside employment, or any other business undertaking that is competitive with or prejudicial to the best interests of the City.
4. Employees may not use proprietary and/or confidential information for personal gain or to the organization’s detriment nor are they allowed to use assets or labor for personal use.
5. If an employee or someone with whom the employee has a close personal relationship has a financial or employment relationship with a vendor, potential vendor, or anyone that has business with the City, the employee must disclose this fact in writing to Human Resources.
6. All Officials and employees are prohibited from hiring a family member or using his or her position in any way to secure employment of a family member. An official or employee cannot hire these family members regardless of whether they live in the same household with the official or employee:
 - Spouse;
 - Parents or grandparents;
 - Children or grandchildren;



- Siblings; and
- Step-children or step parents

All officials and employees are prohibited from hiring these family members if they live in the same household with the official or employee.

- Uncles and Aunts;
- Cousins;
- Nieces and nephews;
- In-laws; and
- Anyone else related to the official or employee by blood or by marriage

7. In compliance with 5 USC Ch. 15 (§§1502-1508) as it pertains to Political Activity of Certain State and Local Employees. An official or employee may not:

(1) use his/her official authority or influence for the purpose of interfering with or affecting the result of an election or a nomination for office;

(2) directly or indirectly coerce, attempt to coerce, command, or advise a State or local officer or employee to pay, lend, or contribute anything of value to a party, committee, organization, agency, or person for political purposes; or

(3) if the salary of the employee is paid completely, directly or indirectly, by loans or grants made by the United States or a Federal agency, be a candidate for elective office;

8. A State or local officer or employee retains the right to vote as he/she chooses and to express his/her opinions on political subjects and candidates.

9. Paragraph 7 (3) from the section above does not apply to:

(1) the Governor or Lieutenant Governor of a State or an individual authorized by law to act as Governor;

(2) the mayor of a city;

(3) a duly elected head of an executive department of a State, municipality, or the District of Columbia who is not classified under a State, municipal, or the District of Columbia merit or civil-service system; or

(4) an individual holding elective office.

For more information **5 USC Ch. 15 (§§1502-1508) as it pertains to Political Activity of Certain State and Local Employees** click on link

<https://uscode.house.gov/view.xhtml?path=/prelim@title5/part2/chapter15&edition=prelim>

10. In compliance with Ohio Administrative Code 123:1-46-02 (<https://codes.ohio.gov/ohio-administrative-code/rule-123:1-46-02>) the following political activity of employees in the classified service of the state certain activities are permissible:



- (1) Registration and voting;
- (2) Expression of opinions, either oral or written;
- (3) Voluntary financial contributions to political candidates or organizations;
- (4) Circulation of nonpartisan petitions, petitions that do not identify with any particular party, or petitions stating views on legislation;
- (5) Attendance at political rallies;
- (6) Signing nominating petitions in support of individuals;
- (7) Display of political materials in the employee's home or on the employee's property;
- (8) Wearing political badges or buttons, or the display of political stickers on private vehicles; and
- (9) Serving as a precinct election official under section [3501.22](#) of the Revised Code.



11. In compliance with Ohio Administrative Code 123:1-46-02 (<https://codes.ohio.gov/ohio-administrative-code/rule-123:1-46-02>), certain political activity of employees in the classified service of the state certain activities are prohibited as follows :

- (1) Candidacy for public office in a partisan election;
- (2) Candidacy for public office in a nonpartisan general election if the nomination to candidacy was obtained in a partisan primary or through the circulation of nominating petitions identified with a political party;
- (3) Filing of petitions meeting statutory requirements for partisan candidacy to elective office;
- (4) Circulation of official nominating petitions for any candidate participating in a partisan election;
- (5) Service in an elected or appointed office in any partisan political organization;
- (6) Acceptance of a party-sponsored appointment to any office normally filled by partisan election;
- (7) Campaigning by writing for publications, by distributing political material, or by writing or making speeches on behalf of a candidate for partisan elective office, when such activities are directed toward party success;



- (8) Solicitation, either directly or indirectly, of any assessment, contribution or subscription, either monetary or in-kind, for any political party or political candidate;
 - (9) Solicitation of the sale, or actual sale, of political party tickets;
 - (10) Partisan activities at the election polls, such as solicitation of votes for other than nonpartisan candidates and nonpartisan issues;
 - (11) Service as witness or challenger for any party or partisan committee;
 - (12) Participation in political caucuses of a partisan nature; and
 - (13) Participation in a political action committee which supports partisan activity.
12. An employee in the classified service who engages in any of the activities listed in paragraphs 9 (1) to (13) of this policy is subject to removal from his or her position in the classified service. The appointing authority may initiate such removal action in accordance with the procedures in section 124.34 of the Revised Code. The director may also institute an investigation or action in case of a violation.
13. Employees in the unclassified service of the state, are not prohibited from engaging in political activity unless specifically precluded by federal or state constitutional or statutory provisions.
14. Service in an appointed or elected position is prohibited when such position is subordinate to or in any way a check upon a position concurrently occupied by a classified or unclassified employee, or when it is physically impossible for one person to discharge the duties of both positions, or if some specific constitutional or statutory bar exists prohibiting a person from serving both positions.
15. The City will determine what course of action must be taken to resolve any conflict it believes may exist. If the conflict is severe enough, The City may be forced to ask the employee to tender his/her resignation.

Employees are encouraged to seek assistance from their managers with any legal or ethical concerns. However, the City realizes this may not always be possible. As a result, employees may call Human Resources at 419-424-7137 to report anything that they cannot discuss with their manager. For more information on ethics refer to the Ohio Ethics Commission at <https://www.ethics.ohio.gov/>.

Director of Law Review 
Human Resources Director 
Mayor 