

# QUONSET DEVELOPMENT CORPORATION

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## WRITTEN PROCEDURES

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## **Exhibit A**

### **Accounting and Administrative Controls**

Pursuant to RI General Law Chapter 35, Section 20-4, The Corporation shall employ the following accounting and administrative controls:

The corporation has endeavored to provide an organization that provides the segregation of duties appropriate for proper safeguarding of public corporation assets.

A plan that limits access to public corporation assets to authorized personnel who require these assets in the performance of their assigned duties.

A system of authorization and recordkeeping procedures adequate to provide effective accounting control over assets, liabilities, revenues, and expenditures.

An established system of practices to be followed in performance of duties and functions in each of the public corporations.

Personnel of a quality commensurate with their responsibilities.

An effective system of internal review.

In order to accomplish this, the following controls have been implemented.

#### **Journal entries**

For standard journal entries, the Senior Accountant enters them into the system, at which time they are automatically generated on a monthly or other regular basis. Nonstandard journal entries are created manually by the Senior Accountant and entered into the system. The system tracks who enters the journal entry into the system in order to leave an audit trail. The Finance Director reviews all journal entries on a random basis. Although the Senior Accountant should normally be the only employee to enter journal entries, the following employees all have the ability to create journal entries: Senior Accountant, AP Clerk, and Finance Director.

#### **Cash**

The bank statement arrives in the mail and goes to the Senior Accountant.

The Senior Accountant performs the bank reconciliation.

The Finance Director reviews the bank reconciliations on random occasions. The Finance Director notes if any old checks need to be transferred to the RI's General Treasurer's office for unclaimed property, and authorizes when necessary.

The Senior Accountant then clears all cash receipts (deposits) and cash disbursements (checks) in the cash reconciliation module of the Great Plains software.

The Senior Accountant then makes entries in the general ledger for any miscellaneous items on the bank statement that were not previously known about such as wire transfers, interest and bank charges. If necessary, the Senior Accountant investigates unknown expenses.

These miscellaneous items requiring entries are then cleared in the Great Plains reconciliation module by the Senior Accountant.

Discrepancies are rare and are usually immaterial. In the event that The Senior Accountant cannot clear a small variance, he/she will post the variance to a miscellaneous expense account at this time.

Once the reconciliation is complete, the Senior Accountant prints a standard report from Great Plains that shows the cash items that have been cleared, and files with the reconciliation. As needed, the Senior Accountant will print a more detailed report that shows outstanding checks and other reconciling items.

The reports and the bank statements are filed, with all reconciliations kept together in one binder.

### **Revenue/Accounts Receivable (A/R)**

Checks arrive in the mail and are opened by the A/P Clerk

The A/P Clerk makes a list of all cash receipts received daily.

The A/R Clerk applies each check against the corresponding invoice in the computer. Invoices are entered in the computer when someone is billed and remain there until a cash receipt is applied against them.

If a miscellaneous cash receipt is received for something that has not already been billed and entered as an invoice, the A/R Clerk records the receipt. He/she lists whom it is from and what it is for and then places it into the proper account.

The A/R Clerk then reviews the checks to be deposited in a summary screen on the computer, which gives the customer name and amount. If it is correct, he/she prints it out.

The A/P Clerk then prepares a deposit slip and attaches the checks. Copies of the checks are made. All deposits are made electronically.

The A/R Clerk matches the deposit slip with the list of cash receipts received that day and prepares a calculated tape to double-check total.

A/R Aging reports are reviewed monthly by the Senior Accountant and the Finance Director.

Monthly lease variances reports are reviewed by the Finance Director.

### **Accounts Payable (A/P)**

Purchase orders, when deemed appropriate (i.e. not used if an approved vendor such as attorneys) are prepared and approved by a department supervisor. If a purchase order exceeds \$500, written documentation of three (telephone) quotes must be obtained.

Requisitions are completed and then distributed in 4 parts with 1 part going to each of the following: the Purchasing clerk, Operations, the vendor, and the originator.

When goods are received, the packing slip is given to the Purchasing Clerk.

The Purchasing clerk matches the packing slip, PO and invoice and submits the completed 3 way match to the A/P Clerk.

Utilities and rents do not need POs. Suppliers like WB Mason are under state contract and the client must purchase from them. A department head signs off on expenses for travel.

The A/P Clerk receives the PO in Great Plains and a payable is created.

Certain payables that don't require a PO must be created and they are entered into the computer directly by the A/P Clerk.

A batch of accounts payable is usually run once a week and checks are printed. Small batches or individual checks are occasionally run if needed.

The batch of checks goes to the Finance Director to be signed. Checks < \$75,000 require 1 signature and checks > \$75,000 require 2 signatures according to the signatory listing.

The Senior Accountant reviews/compares the checks to the supporting invoice, PO and packing slip.

The Administrative Assistant then scans the checks, invoices, PO's and packing slips and attaches the scan to the payable transaction in GP. The checks are then mailed.

At year end, the fiscal year is kept open two weeks in order to record any and all bills received after year end pertaining to the current fiscal period. Any bills received after this period is marked for accruals.

Construction bills are compared to the Capital Expenditure Summary worksheet and reviewed by the Director of Development Services for completeness. He/she also confirms the outstanding amounts for retainage. Based on this analysis, accruals are prepared and booked.

### **Payroll**

All employees are paid bi-weekly. The payroll period runs from Sunday through the second Saturday. The electronic submission to the payroll service is completed by Monday afternoon. The service cuts the checks, wires the money out of our operating account and delivers the payroll package (checks and register) on Tuesday. Employees' checks and stubs are distributed on Wednesday. The Senior Accountant distributes all stubs.

All hourly employees' swipe electronic cards through an electronic time clock and all punches are captured onto the departments' PC. The departmental supervisor reviews all punches and adjusts for all absences. All work is captured on the payroll services web site for review.

All Time and Attendance records are kept on this site.

Employees are paid through direct deposit.

Those responsible for submitting payroll information and recording it are not responsible for hiring and firing employees.

Any changes inputted into the payroll service system concerning rate change, and or new hires must be signed by the Managing Director.

Accruals are calculated on the actual payroll for the last period of the fiscal year. The percentage used correlates with the percentage of days for the prior fiscal period contained within the payroll.

## Exhibit B

### **Travel Expenses**

Employees may be required to incur expenses pertaining to traveling in or out of State of Rhode Island (“State”) in the course of performing their duties and furthering the business purposes and goals of the Corporation. Accordingly, the following policies and procedures establish the methods and policies to be used with respect to reimbursement for business travel expenses.

#### **1. Business Travel within the State**

Employees whose essential job functions include daily travel around the State are not required to get prior approval from their supervisor for in-State travel. However, employees who do not normally travel on company business should get prior approval from their supervisor in advance of travel. Failure to gain prior approval may result in forfeiture or denial of reimbursement.

An Expense Report must be completed by the employee and approved by the Managing Director or his/her designee for all business travel expenses incurred within the State.

In-state travel is defined as travel within a radius of approximately eighty (80) miles of 95 Cripe Street, North Kingstown, Rhode Island, or any subsequent location of the main office of the Corporation (including trips to Boston, Cambridge, Hartford, and Springfield).

Employees are required to use their own personal vehicle for official Corporation business receiving the standard mileage rate established by the IRS.

Reimbursement on a mileage basis should show the meter readings at the beginning and end of each trip as a basis for computing miles traveled. All travel must be on commonly traveled routes. For trips over 25 miles attach a copy of Mapquest or Google Maps, or similar mapping service, reflecting miles traveled.

No transportation costs will be allowed between an employee’s place of residence and his/her office. When the distance between the employee’s residence and his/her destination is shorter than the distance between his/her office and the destination, such travel is not reimbursable.

No overnight lodging will be allowed in connection with travel within the State, as defined above unless authorized by the Managing Director or his/her designee.

#### **Operating a Motor Vehicle**

Under no circumstances is the Corporation responsible for paying parking tickets, speeding tickets or other fines or expenses incurred by employees for traffic, parking or other violations of the law.

## **2. Out of State Business Travel**

Travel out of the State must be authorized by the Travel Request & Reimbursement Process Report form (“TRIP Report”) which requires the advance approval of the Managing Director or his/her designee. Failure to gain prior approval may result in denial and forfeiture of reimbursement.

### **Travel Advances**

Employees traveling out of State on official business may receive reimbursement for expenses incurred in advance of the scheduled travel, providing proof of the expense is submitted and the amount exceeds \$75. The following expenses are eligible for advance reimbursement: airfare, overnight accommodations, and conference or registration fees.

An approved TRIP Report must be submitted at least (5) days prior to the reimbursement of any advance expenditures. Failure to comply with this procedure will result in cancellation of further advance payments and may result in disciplinary action. Final advance payments will be paid no earlier than ten (10) days prior to the schedule departure.

### **Travel Cancellation**

If there is a cancellation of travel, after an advance for expenses has been issued, the employee must notify accounting immediately and return all advances to and/or reimburse the Corporation for any expenses incurred.

### **Reimbursable Expenses**

No later than ten (10) business days after the completion of the scheduled travel, a fully itemized TRIP Report and an Employee Expense Report, accounting for all advances and all reimbursable expenditures must be submitted for final approval and reimbursement.

The following items will be reimbursed to the traveler in full when supported by actual receipts:

- Bus, taxi, airport shuttle service transportation, or rental car gas refill
- Parking, toll expenses
- Necessary business telephone calls, fax transmissions or internet connections
- Automobile Rental (see policy below)

Travelers are expected to use personal funds for trips costing less than \$75 and will be reimbursed by the Corporation for business-related expenses after producing an approved TRIP Report and Employee Expense Report along with attached receipts and/or invoices.

### **Transportation Options**

Transportation includes all necessary business travel on commercial railroads, airplanes and other common carriers at standard coach class rates. The following accommodations will be

permitted, provided that they are supported by valid receipts and/or invoices and the completion of the TRIP Report.

### **Railroad**

Standard accommodations permitted; the period allowed for the trip will be limited to the time required by railroad travel. Travel on extra fare trains permitted where business necessity requires such means of travel and approved by the Managing Director.

### **Airplane**

Allowable transportation accommodations will include coach fares, utilizing the most economical fares possible. The Corporation encourages the use of discount flights, round-trip purchases, advance purchases or other means of reducing the cost of travel. All airline travel should include 3 bids from the available carriers. Quotes can be obtained through [www.kayak.com](http://www.kayak.com) or any other discount travel web-site. Airport parking should be prearranged at reasonably priced long term parking facilities offered at or near the airport.

### **Personally-Owned Automobiles**

Personally-owned automobiles may be used for out-of-state travel in place of a common carrier when it is economically beneficial to the Corporation. For example, when two or more travelers are traveling to the same destination, or when common carrier service is not available, use of a personally-owned automobile may be economically beneficial to the Corporation. Reimbursement will be made on the basis of business miles traveled at the standard mileage rate.

When reimbursement for out-of-state automobile mileage is requested in lieu of common carrier fares, the TRIP Report should contain evidence as to the lower cost, as well as any other reasons a personally-owned automobile will be used.

### **Automobile Rental**

Travelers shall avail themselves of shuttle buses and all other means of public transportation to the extent practical. The use of an automobile rental will be allowed when economically feasible and/or necessary to accomplish the travel mission.

A memo from the traveler must be attached to the travel request form addressing the following: "The Corporation will save money by the rental of an automobile in lieu of public transportation, due to....." or "it is necessary to use a rental vehicle for the purpose of this trip due to....."

Note: Should it be necessary to rent an automobile, the traveler is required to obtain the necessary insurance coverage so as to limit the Corporation from liability. Car rental collision and personal injury insurance is required.

The following are obligations of the traveler when renting a vehicle to conduct State business:

- Possess a proper license to operate the vehicle being rented
- Wear seat belts in accordance with all state laws
- Obey all laws
- Transporting hitchhikers is prohibited
- Consuming drugs or alcohol before or while operating vehicle is prohibited
- Complete a report of any vehicle damage and advise the Managing Director or his/her designee immediately

Travelers shall fill the fuel tank of the rental car prior to returning to the leasing company.

### **Fares**

The cost between each point of travel should be itemized separately as to include (1) the type of common carrier, (2) cost of transportation and (3) transportation to and from the airport or train or bus station, (4) parking garage fees if applicable.

### **Meals, Lodging and Expenses**

#### **Meal Allowance**

Only travelers staying overnight (out-of-state) travel will be allowed a meal allowance. The reimbursement will still be based on a flat rate and based on departure and arrival times as follows:

- If the traveler's scheduled departure time is before noon, they will receive \$30.00 for the first day of travel
- If the traveler's scheduled departure time is after noon, they will receive \$15.00 for the first day of travel
- If the traveler's scheduled return time is before noon, they will receive \$15.00 for the final day of travel
- If the traveler's scheduled return time is after noon, they will receive \$30.00 for the final day of travel

All full days between departure day and arrival day will be at the rate of \$30.00.

#### **Lodging Allowances**

Employees traveling on official Corporation business are expected to stay at the hotel at which their conference or seminar is being held. If no rooms are available at the conference/host hotel, then employees are expected to stay at a comparably priced (tourist class) hotel, at the single room rate.

#### **Miscellaneous Expense Allowance**

An allowance for expenses up to \$5.00 per day is allowed for miscellaneous expenses, without a receipt. These expenses must be itemized and may include tips, telephone calls and any other necessary out-of-pocket expense incurred as a result of travel.

In addition to this allowance, registration or conference fees and unusual miscellaneous expenses are reimbursable when they are properly explained in the TRIP Report and documented with attached receipts and/or invoices.

### **Final Reimbursement for Travel**

All claims for reimbursement for travel expenses should be submitted to the Managing Director (or his/her designee) and the Finance Director with a completed TRIP Report as well as a completed itemized Employee Expense report and supported by attached receipts and/or invoices for the following:

- Conferences/registration fees, transportation and lodging (if prepayment was not requested)
- Meal allowances
- Parking fees, toll expenses
- Shuttle and/or cab fares
- Other expenses with justification

The traveler must also include the following with the reimbursement request:

- Travel itinerary (hotel, air and car rental)
- Tickets, boarding passes or ticketless itinerary from the airline
- Baggage fee receipt (1<sup>st</sup> bag per traveler, each way only, if applicable)
- Hotel detail bill (from the actual hotel)
- Agendas/Proof of attendance
- Car Rental receipts
- Taxi/shuttle receipts
- Parking receipts
- Justifications for any exceptions that were made (including extra night accommodations)
- Other supporting documentation

### **Traveling with Co-workers**

When traveling with other employees, travel expenses should be shared whenever practical. This may include sharing the cost of a car rental, parking fees, lodging etc...

### **Traveling Companions w/ Corporation Employee**

The Corporation reimburses its employees for business-related expenses only. Any and all expenses incurred by employees in connection with having a spouse or another person accompany them on a business trip are not business-related and thus not reimbursable by the

Corporation; The Managing Director or his/her designee may, in advance, approve a spouse or another person accompanying an employee as a legitimate business advantage to the Corporation and therefore may approve related expenses.

Employees who have a spouse or another person accompany them on a business trip are required to keep an itemized list of their expenses, noting all expenses associated with the spouse or other person and separating those expenses from business-related expenses. To the extent possible, employees who bring a spouse or other person with them on a business trip must obtain separate receipts and/or invoices for meals, lodging, plane tickets, taxi cab fares, room service, use of the telephone, and all other expenses. The employee will receive reimbursement for 3/4 of the hotel at a double occupancy room rate.

### **Compliance**

Any employee who violates the policies and procedures set forth in this section may be subject to disciplinary action, up to and including termination of employment.

## **Exhibit C**

### **Charitable Contributions**

All grants, charitable and civic donations, and/or contributions shall be voted on by the Board of Directors of the Corporation during an open meeting and the vote shall be recorded in the minutes of the meeting, together with: (i) The citation to the specific State statute authorizing the action; (ii) An explanation of how the grant, donation or contribution relates to the Corporation's mission; (iii) The identity of each board member or employee of the Corporation that will receive any benefit from the grant, donation, or contribution including without limitation tickets to events, meals, and golf; (iv) Any disclosure required by the Code of Ethics of the Corporation; and (v) Each such grant, donation, or contribution shall be clearly identified in the financial statements of the corporation.

## **Exhibit D**

### **Credit Card Use**

The Corporation does not allow any credit cards to be used for personal use. The Corporation may maintain up to one (1) credit card for use strictly for Corporation business and for carrying out the mission and purposes of the Corporation. Said credit card shall remain in the possession of the Managing Director or his/her designee and the Managing Director or his/her designee must approve, in advance, any use of the credit card.

## **Exhibit E**

### **Personnel**

Pursuant to Title 42, Chapter 64.10, Section 7 of the Rhode Island General Laws, the Corporation may hire employees. The Corporation will, in addition to complying with all applicable Federal and State laws, ordinance and regulations, employ the following policies in connection with the hiring and dismissal of personnel:

Positions for employment by the Corporation and the salaries therefor will be as set forth in the annual budget approved by the Board of Directors of the Corporation.

All available positions for employment by the Corporation will be posted internally within the Corporation and externally by means of newspaper, website and other commercially reasonable means. The head of the department within which the position for employment is available will, in coordination with the Managing Director or his/her designee, create a job description for the desired position that will be posted as aforesaid.

Applications, resumes, references and other available information about the applicants are to be reviewed by a hiring committee comprised of employees selected by the Managing Director or his/her designee within the department in which the position for employment is available. The applicants with the strongest qualifications will be invited to interview with the hiring committee. After such interviews, the hiring committee will make recommendations to the Managing Director or his/her designee and the Managing Director or his/her designee will make the final determination as to which applicant, if any, to hire for the available position.

All employees of the Corporation are “At Will” employees and subject to dismissal at any time and for any reason or no reason. The Managing Director or his/her designee will make the final determination whether to dismiss an employee.

## **Exhibit F**

### **Marketing Expenses**

The Corporation may incur marketing expenses in accordance with the annual budget approved by the Board of Directors of the Corporation. All individual marketing expenses must be approved in advance by the Managing Director or his/her designee and such expenses must be incurred for the purpose of carrying out the mission and purposes of the Corporation.

## **Exhibit G**

### **Lobbyists' Expenses**

The Corporation may incur lobbyists' expenses in accordance with the annual budget approved by the Board of Directors of the Corporation. All individual lobbyists' expenses must be approved in advance by the Managing Director or his/her designee and such expenses must be incurred for the purpose of carrying out the mission and purposes of the Corporation.

## **Exhibit H**

### **Executive Compensation Committee**

The Executive Compensation Committee of the Board of Directors of the Corporation is directed to:

1. Recommend to the full Board of Directors the compensation packages of the Managing Director and the Finance Director of the Corporation based upon the following: comprehensive and objective analysis of comparable compensation of similar officers of state government, other authorities, quasi-public corporations, and private-sector employees with similar functions and responsibilities.

The committee may retain a consultant to assist in the comparability study. When calculating compensation, the committee shall consider the value of the retirement plan in the overall compensation package.

2. Prepare clear, written job descriptions and clear, written expectations of job performance for the Managing Director and Finance Director.
3. Conduct the job performance review of the Managing Director at least annually.
4. Negotiate any employment contracts of the executive officers which contracts, if any, shall be approved by the full Board of Directors during an open meeting of the Corporation.

## **Exhibit I**

### **Naming Policy with Respect to Real Property and Improvements**

The Quonset Development Corporation (the “Corporation”) shall comply with the following policy with respect to naming real property and improvements (“Facility” or “Facilities”) that are under the authority of the Corporation, as agent and attorney in fact for the Rhode Island Commerce Corporation, pursuant to Rhode Island General Laws 42-64.10 et. seq., in honor of an individual, family, or group of individuals:

Upon receipt by a director of a naming request, the director shall refer the request to the Managing Director for a due diligence review and a determination by the Managing Director as to whether or not such request will be placed on the Board Agenda. The Corporation may, by an affirmative vote of at least seven (7) Directors of the Corporation, approve such request upon a finding that either:

(i) The individual, family or other group of individuals have or had a significant connection to the former Quonset Naval Air Station or the former Naval Construction Battalion Center Davisville; or

(ii) The individual, family or other group of individuals were instrumental in the re-development of the Quonset Business Park following the closure of the former Quonset Naval Air Station and the former Naval Construction Battalion Center Davisville; or

(iii) The individual, family or other group of individuals have demonstrated significant civic involvement in the Town of North Kingstown and serve as a lasting example of good citizenship and community involvement. In the case of this item (iii), the recommendation for so honoring an individual, family or group of individuals must originate as a request made pursuant to a resolution passed by the Town Council of the Town of North Kingstown and delivered to the Managing Director of the Corporation.

## **Exhibit J**

### **Quonset Development Corporation Code of Ethics**

The Quonset Development Corporation (“QDC”) and its directors, officers, and employees shall comply with the following code of ethics to ensure that they adhere to the highest standards of ethical conduct, respect the public trust and the rights of all persons, be open, accountable and responsive, avoid the appearance of impropriety, and do not use their position for private gain or advantage.

- A. Directors, officers, and employees shall not have any interest, financial or otherwise, direct or indirect, or engage in any business, employment, transaction, or professional activity, or incur any obligation of any nature, which is in substantial conflict with the proper discharge of their duties or employment in the public interest and their responsibilities as prescribed in the laws of this state.
  - 1. A director, officer, or employee has an interest in substantial conflict with the proper discharge of his or her duties or employment in the public interest and of his or her responsibilities as prescribed in the laws of this state, if he or she has reason to believe or expect that he or she or any of his or her family members, business associates, outside employers, or businesses which he or she represents will derive a direct monetary gain or suffer a direct monetary loss by reason of his or her official activity.
- B. Directors, officers, and employees shall not accept outside employment that would impair independence of judgment in the conduct of official duties or employment or that would require or induce the disclosure of confidential information acquired in the course of official duties.
- C. Directors, officers, and employees shall not willfully and knowingly disclose, for pecuniary gain, to any other person, confidential information acquired in the course of official duties or employment, or use any such information for pecuniary gain.
- D. Directors, officers, and employees shall not use their public office or confidential information received through holding public office to obtain financial gain, other than that provided by law, for themselves or for their families, business associates, outside employers, or any business which they represent.
- E. Directors, officers, and employees shall not represent themselves or any other person or act as expert witnesses before the QDC. This prohibition applies for a period of one year after the official severance of the position with the QDC. In cases of hardship, a director, officer, or employee may represent him or herself upon application to the ethics commission, provided that he or she shall first advise the QDC in writing of the existence and nature of his or her interest in the matter at issue; recuse him or herself from voting on

or otherwise participating in the QDC's consideration and disposition of the matter at issue; and follow any other recommendations the ethics commission may make to avoid any appearance of impropriety in the matter.

- F. No business associate of any director, officer, or employee shall represent him or herself or any other person, or act as an expert witness before the QDC. This prohibition shall not apply if the business associate advises the QDC of the nature of the business relationship with the director, officer, or employee; and the director, officer, or employee recuses him or herself from participating in the QDC's consideration and disposition of the matter.
- G. Directors, officers, and employees shall not solicit or accept any gift, including a loan, political contribution, reward, or promise of future employment, based on any understanding that the gift will influence official action or judgment. This prohibition also applies to any spouse (if not estranged), dependent child, business associate, or outside employer of a director, officer, or employee, or any business which a director, officer, or employee represents.
- H. Directors, officers, and employees shall not enter into any contract with any state or municipal agency unless that contract has been awarded through an open and public process that includes prior public notice and subsequent public disclosure of all proposals considered and contracts awarded. However, contracts for professional services that are customarily awarded without competitive bidding shall not be subject to competitive bidding if awarded through a process of public notice and disclosure of financial details. This prohibition also applies to family members, business associates, and any business entity in which directors, officers, and employees or their family members or business associates have a ten percent or greater equity interest or \$5,000 or greater cash value interest.
- I. Directors, officers, and employees shall not, either directly or indirectly, threaten or intimidate any complainant or witness or any family member of any complainant or witness in any proceeding before the state ethics commission.

## **Quonset Development Corporation Employee Code of Ethics Summary**

In accordance with the Quonset Development Corporation Code of Ethics (a full copy of which is posted on the Quonset Development Corporation website and also available upon request), employees of the Quonset Development Corporation (“QDC”) shall **not**:

- Have any interest which conflicts with your duties as a QDC employee, such as, by deriving monetary gain by reason of your activity as a QDC employee.
- Accept outside employment that would impair your independent judgment in performing your duties as a QDC employee (including the disclosure of confidential information).
- Use your position as a QDC employee or any confidential information received through your position as a QDC employee for financial gain for yourself or your family, business associates or outside employer.
- Represent yourself or any other person or act as an expert witness before the QDC.
- Solicit or accept any gift, loan, reward, or promise of future employment, based on an understanding that the gift will influence your official conduct as a QDC employee. A QDC employee’s spouse, dependent child, business associate, or outside employer also may not solicit or accept such gifts.
- Threaten or intimidate any participant or a family member of any participant in a proceeding before the state ethics commission.
- Enter into any contract with any state or municipal agency unless that contract has been awarded through an open and public process. This prohibition also applies to family members, business associates, and any business entity in which QDC employees or their family members or business associates have a ten percent or greater equity interest or \$5,000 or greater cash value interest.