CLINTON-KAINE TRANSITION CODE OF ETHICAL CONDUCT

As a condition of being permitted to serve as a member of the Clinton-Kaine Transition, I agree to abide by the following requirements during the term of my service:

- 1. In all of my activities related to the transition I will abide by the highest ethical standards. I will avoid both actual and apparent conflicts of interest. I will act in a manner that reflects positively on the transition and promotes public confidence in the transition process.
- 2. I will disqualify myself from involvement in any particular transition matter which to my knowledge may directly conflict or appear to conflict with a financial interest of mine, my spouse, family member, or any individual or organization with which I have a pecuniary interest.
- 3. I will disqualify myself from involvement in any particular transition matter, as well as field of policy to which that particular matter relates, in which I have engaged in reportable lobbying activities, as defined by the Lobbying Disclosure Act, within the previous 12 months.
- 4. I will not contact any agency to which I have made reportable lobbying contacts, as defined by the Lobbying Disclose Act, within the previous 12 months.
- 5. If I am currently a federally registered lobbyist:
 - a. I understand that I may not contribute to or collect contributions for the Transition.
 - b. I understand that I may not incur any expenses on behalf of the Transition, whether they are paid by me personally or by my employer.
 - c. I understand that I will not be permitted to serve in an official role for the Transition, including but not limited to serving on an advisory group or as an outside expert.
- 6. I will not solicit or accept any money or things of value in exchange for a promise to influence in any way the Transition's operations or decision-making, including supporting or using influence on behalf of any person who is a candidate for any appointive office or place in the United States Government.
- 7. I will not solicit or accept any money or things of value as an inducement, reward or thank you to support or use influence on behalf of any person who is a candidate for any appointive office or place in the United States Government.

- 8. I understand that in my transition-related activities, unless given specific authorization, I am not permitted to make any representations on behalf of Secretary Clinton or Senator Kaine.
- 9. I understand that authorization is required from the Transition's Executive Directors or the Executive Directors' designee before seeking, on behalf of the Transition, access to any non-public information.
- 10. I will hold in confidence any non-public information provided to me in the course of my duties with the Transition and ensure that such information is used exclusively for purposes of the transition.
- 11. I will not use or permit to be used any non-public information, in any manner, for any private gain for myself or any other party, at any time during or after the transition.
- 12. I will not communicate with or appear before, with the intent to influence, any federal agency as a federally registered lobbyist with respect to which I have substantial responsibility during the transition for the duration of my service on the Transition, and for the period of 12 months after the conclusion of my service on the Transition. I will establish reasonable procedures to assure that I will not participate in any undertaking with respect to which I am affected by this provision.
- 13. I will conserve and protect any federal property entrusted to me, and shall not use federal property, including motor vehicles or other forms of transportation, stationery, e-mail, printing, equipment and supplies, other than for purposes directly related to transition activities.
- 14. I will not solicit any personal gifts from any source (other than immediate family) whatsoever.
- 15. Neither I nor any member of my immediate family will accept a gift from:
 - a. anyone who is seeking a job with the federal government;
 - b. a federal employee in any agency or department within the scope of my transition responsibilities;
 - c. any person or organization that conducts activities regulated by or has a matter pending before an agency or department within the scope of my transition responsibilities; or
 - d. any person or organization under circumstances where it may reasonably appear that the gift is being given in order to influence my decisions, advice, recommendations or actions on the transition.
- 16. I will not represent, aid or advise a foreign government or foreign political party either domestically or abroad for the duration of my service on the Transition and for the period of 12 months after the conclusion of my service on the Transition.

17. I understand that if I am a Transition volunteer who works in the private sector, for a nonprofit agency, or for an academic institution, I must arrange to do my Transition work on leave, on vacation time, or otherwise on my own time, and provide documentation of those arrangements at the request of the Transition.

I understand that my commitment to abide by these requirements may be made public and that this document will be made available to any department or agency to which I may be assigned. I will seek guidance from Counsel to the Transition, or designated ethics officials, as appropriate to ensure compliance with these standards of conduct. I further acknowledge that failure to comply with the above provisions may result in my dismissal.

Signature: _____

Printed Name: _____

Date: _____