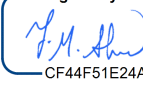




Ohio Turnpike and Infrastructure Commission

Policy: Ethics Policy	Authorized by: Signed by:  CF44F51E24AB46A... <hr/> Ferzan M. Ahmed, P.E. Executive Director
Department: Legal	Effective Date:
Policy No.: Leg 1	8/21/2025

- Purpose:** To ensure that all individuals employed by the Ohio Turnpike and Infrastructure Commission (“Commission”) adhere to the high ethical standards in government embodied in Ohio’s Ethics Laws as codified in Chapters 102 and 2921 of the Ohio Revised Code and as interpreted by the courts of this State and by the Opinions of the Ohio Ethics Commission (the “Ethics Laws”).
- Authority/Reference:** ORC 102, et seq; ORC 2921, et seq.; Executive Order 2019-11D.
- Definitions:**

“Anything of value” includes anything of monetary value, including, but not limited to, money, gifts, food or beverages, social event tickets and expenses, travel expenses, golf outings, consulting fees, compensation, or employment.

“Value” means worth greater than de minimis or nominal.

“Anyone doing business with the Commission” includes, but is not limited to, any person, corporation, or other party that is doing or seeking to do business with, regulated by, or has interests before the Commission, their agents or anyone acting on their behalf.

- Policy:**

Policy Statement

It is policy of the Ohio Turnpike and Infrastructure Commission (“Commission”) to carry out its mission in accordance with the strictest ethical guidelines and to ensure that the Commission members and employees conduct themselves in a manner that fosters public confidence in the integrity of the Commission, its

processes, and its accomplishments.

General Standards of Ethical Conduct

Commission officials and employees must, at all times, abide by protections to the public embodied in Ohio's ethics laws, as found in Chapters [102](#). and [2921](#) of the Ohio Revised Code, and as interpreted by the Ohio Ethics Commission and Ohio courts. (A copy of these laws is provided by the Commission, and receipt acknowledged, as required in R.C. [102.09\(D\)](#).) Members and employees must conduct themselves, at all times, in a manner that avoids favoritism, bias, and the appearance of impropriety.

A general summary of the restraints upon the conduct of all members and employees includes, but is not limited to, those listed below. No member or employee shall:

- Solicit or accept anything of value from anyone doing business with the Commission;
- Solicit or accept employment from anyone doing business with the Commission, unless the official or employee completely withdraws from any Commission discretionary or decision-making activity regarding the party offering employment, and the Commission approves the withdrawal;
- Use his or her public position to obtain benefits for the official or employee, a family member, or anyone with whom the official or employee has a business or employment relationship;
- Be paid or accept any form of compensation for personal services rendered on a matter before, or sells goods or services to the Commission;
- Be paid or accept any form of compensation for personal services rendered on a matter before, or sell (except by competitive bid) goods or services to any state agency other than the Commission, unless the member or employee first discloses the services or sales and withdraws from matters before the Commission that directly affect officials and employees of the other state agency, as directed in R.C. [102.04](#);
- Hold or benefit from a contract with, authorized by, or approved by, the Commission, (the Ethics Law does except some limited stockholdings, and some contracts objectively shown as the lowest cost services, where all criteria under R.C. [2921.42](#) are met);

- Vote, authorize, recommend, or in any other way use his or her position to secure approval of a Commission contract (including employment or personal services) in which the official or employee, a family member, or anyone with whom the official or employee has a business or employment relationship, has an interest;
- Solicit or accept honoraria (see R.C. [102.01](#)(H) and [102.03](#)(H));
- During public service, and for one year after leaving public service, represent any person, in any fashion, before any public agency, with respect to a matter in which the official or employee personally participated while serving with the Commission;
- Use or disclose confidential information protected by law, unless appropriately authorized;
- Solicit or accept any compensation, except as allowed by law, to perform his or her official duties or any act or service in his or her official capacity; and
- Use, or authorize the use of, his or her title, the name “Commission,” or the “Commission’s acronym,” or the Commission’s logo in a manner that suggests impropriety, favoritism, or bias by the Commission or the official or employee;

For purposes of this policy:

- “Anything of value” includes anything of monetary value, including, but not limited to, money, loans, gifts, food or beverages, social event tickets and expenses, travel expenses, golf outings, consulting fees, compensation, or employment. “Value” means worth greater than de minimis or nominal.
- “Anyone doing business with the Commission” includes, but is not limited to, any person, corporation, or other party that is doing or seeking to do business with, regulated by, or has interests before the Commission, their agents or anyone acting on their behalf.

Financial Disclosure

Every Commission member or employee required to file a financial disclosure statement must file a complete and accurate statement with the Ethics Commission by May 15th of each year. Any member or employee appointed or employed to a filing position after February 15th and required to file a financial disclosure statement must file a statement within ninety days of appointment or employment.

Ethics Education

All Commission members and employees who hold senior policy positions must participate in the ethics education offered by the Governor's Office pursuant to Executive Order [2019-11D](#). The Executive Order requires education in the amount of four hours every two years. In addition to participating in Executive Order training, the Ethics Commission sponsors educational sessions throughout Ohio.

Publication of the Commission's Ethics Policy

The Commission's Ethics Policy shall be published on the Commission's website, www.ohioturnpike.org. Persons, corporations or other parties seeking to conduct business with the Commission in amounts in excess of \$10,000.00 shall be provided with a copy of the policy and shall be required to acknowledge receipt of the policy in writing in a form to be prescribed by the Commission's General Counsel.

Assistance

The Ethics Commission is available to provide advice and assistance regarding the application of the Ethics Law and related statutes. The Commission can be contacted at (614) 466-7090. The Commission's web site address is: www.ethics.ohio.gov. The Commission's counsel and counsel for the Governor's office are available to answer questions involving this policy.

Penalties

Failure of any Commission official or employee to abide by this Ethics policy, or to comply with the Ethics Law and related statutes, will result in discipline, which may include dismissal, as well as any potential civil or criminal sanctions under the law.

Evaluation and Changes

This policy shall be evaluated for effectiveness by the Commission no less than biennially. The policy may be changed only by a majority vote of the Commission.

- 5. Applicability:** This policy applies to all employees of the Commission.
- 6. Contact:** General Counsel
- 7. Policy History**

Date	Description of Change	Department
8/21/2025	Original Issuance	Legal