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## Obama-Biden Transition Project Code of Ethical Conduct

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As a condition of being permitted to serve as a member of the Obama-Biden Transition Project, I agree to abide by the following requirements:

1. I will disqualify myself from involvement in any particular Obama-Biden Transition Project matter which to my knowledge may directly conflict with a financial interest of an immediate family member, partner, client, or other individual or organization with which I have had a business relationship within the past 12 months. Should there be no such direct conflict, but the potential for the appearance of a conflict, I will present this issue for resolution to the Transition Project Executive Director or the Executive Director's designee.
2. I will disqualify myself from involvement in any particular transition matter if I have engaged in regulated lobbying activities with respect to such matter, as defined by the Lobbying Disclosure Act, within the previous 12 months.
3. If I am, or have been at any time in the last 12 months, a federally-registered lobbyist,
  - a. I understand that I may not assist the Transition in any subject matter area within which, at any time in the previous 12 months, I have provided services as a federally registered lobbyist, and that this restriction extends beyond particular matters to
    - i. the field of policy to which a particular matter relates; and
    - ii. the agency or department lobbied on any such matter.
  - b. I understand that I must cease all lobbying activity for the period that I am assisting the Transition Project in any approved capacity.
  - c. I understand that I may not contribute to or collect contributions for the Obama-Biden Transition Project.
  - d. I understand that I may not incur any expenses on behalf of the Obama-Biden Transition Project, whether they are paid by me personally or by my employer.
  - e. I understand that I may not begin work until my involvement has been approved by the Obama-Biden Transition Project Executive Director or the Executive Director's designee.
4. I will not solicit or accept any money or things of value in exchange for a promise to influence in any way the Transition Project operations or decision-making, including 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.
5. I understand that in my Obama-Biden Transition Project-related activities, unless given specific authorization, I am not permitted to make any representations on behalf of Senator Obama or Senator Biden, their designees, or any official of the Obama-Biden Transition Project, and in all my service to the Transition Project, I will identify myself only as acting on behalf of the Transition Project on transition-related matters.
6. I understand that authorization is required from the Obama-Biden Transition Project's Executive Director or the Executive Director's designee before seeking, on behalf of the Obama-Biden Transition Project, access to any non-public information.
7. I will hold in confidence any non-public information provided to me in the course of my duties with the Obama-Biden Transition Project and ensure that such information is used exclusively for purposes of the Obama-Biden Transition Project.
8. I will not use or permit to be used any non-public information, in any manner, for any private gain or any other non-Transition Project related purpose for myself or any other party, at any time during or after the operation of the Obama-Biden Transition Project.
9. During my service with the Obama-Biden Transition Project, I will not communicate with or appear before, with the intent to influence, any federal agency with respect to which I have substantial responsibility during the activities of the Transition Project, on behalf of any other person or entity (except federal, state, local or tribal government entities). I will promptly cause my firm or organization to establish reasonable procedures to assure that I will not participate in any undertaking with respect to which I am affected by this provision.

10. For 12 months following the conclusion of my service with the Obama-Biden Transition Project, I will not on behalf of any person or entity (except federal, state, local or tribal government entities) communicate with or appear before, for compensation and with the intent to influence, any cabinet secretary or federal agency on a particular matter for which I had substantial responsibility during my service to the Transition Project.
11. 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, printing, equipment and supplies, other than for purposes directly related to the activities of the Obama-Biden Transition Project.
12. 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 Obama-Biden Transition Project 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 Obama-Biden Transition Project 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 as an Obama-Biden Transition Project member. This paragraph does not bar holiday gifts from family members or close personal friends.
13. I will not represent, aid or advise a foreign government or foreign political party for the duration of service to the Obama-Biden Transition Project.
14. I understand that if I am an Obama-Biden Transition Project volunteer who works in the private sector, for a non-profit agency, or for an academic institution, I must arrange to do my Transition Project work on leave, on vacation time, or otherwise on my own time, and provide documentation of those arrangements at the request of the Transition Project.

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 the General Counsel to the Obama-Biden Transition Project, 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: \_\_\_\_\_



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