## POLICY MANUAL CHAPTER 6 - HUMAN RESOURCES POLICIES 6. CONFLICT OF INTEREST/ETHICS POLICY

- A. All Mississippi Lottery Corporation (the "Corporation") officers and employees are "public servants" as defined in Miss. Code §25-4-103 and are thus subject to the requirements and restrictions of the Mississippi Ethics in Government Act, Miss. Code §25-4-101 et seq. All division chiefs and officers are subject to §25-4-25 and must file a Statement of Economic Interest with the Mississippi Ethics Commission. Without limiting the ethical obligations thereby imposed, the Corporation requires the following of all its directors, officer and employees. For purposes of the following paragraphs, "financial interest" excludes a passive investment amounting to less than 1% of the ownership of a publicly-traded business.
- B. The name of a Corporation director or officer shall not appear on any Lottery ticket, game, Lottery form or paper used in playing any Lottery game;
- C. Only the President or the Board may authorize disclosure of a confidential communication with the Corporation's legal counsel; no unauthorized disclosure may be made by any of us;
- D. All officers and employees must cooperate with the independent auditor retained to perform any audit pursuant to the Lottery Law;
- E. No director, officer or employee, nor any spouse, sibling, ascendant or descendant may have a financial interest in any vendor doing business with or proposing to do business with the Corporation.
- F. No director, officer or employee with relevant decision-making authority will participate in any decision regarding Lottery retailer if he or she, his or her spouse, sibling, ascendant or descendant has a financial interest in that Lottery retailer.
- G. No director, officer or employee will commit or assist another to commit any crime or actionable civil wrong affecting Lottery operations, including but not limited to skimming Lottery proceeds or possessing or using an illegal lottery device;
- H. No director, officer or employee will engage in conduct that, if publicized, would provoke public doubt of the Lottery's fairness or financial trustworthiness;
- I. Each director, officer or employee who has knowledge of a breach of this Code of Ethics will report that knowledge promptly to the President, the Board, legal counsel or through a toll-free number to be established; and

- J. After ceasing to be a Corporation, employee, officer or director, no one way, for one year thereafter
  - i. Represent any vendor or Lottery retailer before the Corporation; or
  - ii. If a former Corporation director or officer, directly or through an owned entity, solicit or accept employment or enter into a contract for compensation of any kind with a Corporation vendor.
- K. Any director, officer or employee who violates this Code of Ethics may be subject to dismissal from office or termination of employment and other criminal and civil penalties as prescribed by applicable law.
- L. The following persons shall not be purchase tickets for any Lottery game, or shall prizes be paid to any of the following persons:
  - i. Any member of the board;
  - ii. Any officer or employee of the Corporation;
  - iii. Any vendor, including Lottery retailers; or
  - iv. Any spouse, child, brother, sister or parent residing as a member of the same household in the principal place of abode of any person listed in paragraph i, ii or iii of this paragraph.