

Ethics Commission

RECEIVED

2019 MAY 20 A 9:07

Advisory Opinion 2019-2

TOWN CITY CLERK  
NORWICH CT

The Advice Requested: Michael P. Gualtieri, City Treasurer requested a review of the banking benefits being offered to employees of the City of Norwich and employees of Norwich Public Utilities by People's United Bank. These banking benefits include the following:

- Access to financial workshops and financial education content modules
- \$100 upon opening a personal checking account
- Free first order of checks
- Free Health Savings Account
- Discount on Safe Deposit Box rental for the first year
- Waived HELOC annual fee for the first year
- 0.25% HELOC rate discount with auto deduction from People's United Bank checking account
- Waived mortgage Underwriting Fee
- \$500 mortgage closing cost credit
- 0.25% rate discount on vehicle loans, personal loans, and personal time loans

This request for an advisory opinion was received in the office of the City Clerk on April 30<sup>th</sup>, and was taken up at the regular meeting of the Ethics Commission on May 13, 2019.

The City of Norwich Code of Ethics that pertains to this question is Section 2-54 Conflict of Interest, sub section c, Gifts and Favors:

*"Gifts and favors.* No officer, official or employee shall accept or solicit any gift from any person who, to his or her knowledge, is interested, directly or indirectly, in any manner whatsoever, in business dealings with the city, or which gift may tend to influence him or her in the discharge of official duties or in granting any improper favor, service or thing of value."

The Ethics Commission discussion focused on the nature of the offerings from People's United Bank, indicating that this is a common marketing practice to encourage employees of a partner organization to open accounts and connect their payroll deposit with the bank. This is the ordinary course of business for banks and the employees of their partner institutions. The City of Norwich already does business with People's United Bank, and allows citizens to make their tax payments to the city at any of the People's United Bank branches for convenience. This offer made available to employees is an extension of that relationship and these perks are not gifts in that they are marketing features offered to other employers that partner with the bank.

The vote was unanimous; the members of the Ethics Commission do not consider the marketing perks offered by People's United Bank to City of Norwich and NPU employees to be gifts under the Norwich Code of Ethics provision covering gifts and favors.

On behalf of the Norwich Ethics Commission,

Carol Menard, Chairperson